

# FASHION TRANSPARENCY INDEX

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**2018 EDITION**

*A review of 150 of the biggest global fashion brands and retailers ranked according to how much they disclose about their social and environmental policies, practices and impact.*

FASHION  
REVOLUTION

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# FOREWORD



**CARY SOMERS**  
FOUNDER AND GLOBAL OPERATIONS DIRECTOR  
FASHION REVOLUTION

*Transparency is like water. After the Rana Plaza factory collapsed in Bangladesh five years ago, transparency started as a slow trickle. It began bubbling up through the cracks. Now it is seeping into some of the darkest corners, permeating the fabric of the industry.*

My favourite short story is La Luz Es Como el Agua, Light Is Like Water, by Gabriel García Marquéz. Two brothers ask for a rowing boat one Christmas. Every Wednesday, whilst their parents are at the cinema, they let the light flow out to a depth of four hand spans and then learn to use a sextant and compass as they navigate around their fifth floor apartment in Madrid. This adventure was the result of a frivolous remark in response to one of the boys asking why light comes out at the flick of a switch.

'Light is like water. You turn on the tap and out it comes.' Months later, they win a school prize and are both rewarded with diving outfits. The following Wednesday, they invite all their classmates over for a party while their parents are out and turn on so many lights that the apartment floods, drowning all the classmates apart from the two brothers. When the firemen finally force open the door, the brothers are navigating towards the lighthouse amidst the 'household objects, in the fullness of their poetry, flying through the kitchen sky on their own wings.'

Transparency is like water. After the Rana Plaza factory collapsed in Bangladesh five years ago, transparency started as a slow trickle. It began bubbling up through the cracks. Now it is seeping into some of the darkest corners, permeating the fabric of the industry. This year's Fashion Transparency Index results show that it's not yet a raging torrent, flowing into every deep nook

**"Transparency is visibility. We want to see the fashion industry, respect its producers and understand its processes. We want a clear, uninterrupted vision from origin to disposal to foster dignity, empowerment and justice for the people who make our clothes and to protect the environment we all share."**

**ORSOLA DE CASTRO**  
FOUNDER AND CREATIVE DIRECTOR,  
FASHION REVOLUTION

and crevice, reshaping everything in its path, but the light bulbs of transparency are permanently set to the on position.

Make no mistake about it, there is no going back; this river of transparency will become a flood. When this time comes, those brands who know how to use the tools of transparency to navigate a new course, will be the ones who will survive. These are the companies who are able to spot any unauthorised suppliers being used to make their products; the ones who are managing and mitigating risks that might lead to human rights and environmental abuses; the ones who are protecting their brand's reputation.

Transparency is power. The brands that are still sitting in the armchairs in their fifth floor apartments, who haven't yet learnt how to sail on the tide of transparency, will be drowned by it. The wave is coming; now is the time to get ahead of the curve.

# EXECUTIVE SUMMARY

## Ten brands and retailers lead the path towards greater transparency amongst the major corporate players

Adidas and Reebok top the Index again this year scoring 58% or 144.5 out of 250 possible points followed by Puma, H&M, Esprit, Banana Republic, Gap, Old Navy, C&A and Marks & Spencer in the 51–60% range. ASOS is shortly behind at 50%, having increased their level of disclosure by 18% since last year. The mean average score amongst all 150 brands and retailers is 52 (21%) out of 250 possible points.

## The brands and retailers we reviewed last year have increased their level of transparency by 5%

When we compare the 98 brands and retailers that were included in both the 2017 and 2018 Fashion Transparency Index, we have seen these brands and retailers increase their level of transparency by an average of approximately 5% overall and across

each section of the methodology – suggesting that inclusion in the Fashion Transparency Index has influenced brands and retailers to disclose more.

## Major luxury brands move towards transparency

Hugo Boss, Calvin Klein, Tommy Hilfiger, Gucci, Bottega Veneta, YSL and Burberry score in the 31–40% range, with Hugo Boss increasing its score by 11%, Calvin Klein and Tommy Hilfiger increasing their score by 9%, Gucci, Bottega Veneta and YSL increasing their score by 8% and Burberry increasing their score by 7% this year.

## Too many big brands and retailers continue to lack transparency

12 brands and retailers (8%) have scored 0% in 2018, compared to three (3%) in the 2017 report. These brands and retailers' lack of disclosure brings down the overall average score, despite many brands disclosing considerably more information this year compared to 2017.

Dior, Heilan Home and s.Oliver continue to disclose nothing, and this year we are seeing next to nothing from Barney's New York, Desigual, Jessica Simpson, Longchamp, Liverpool, Max Mara, Mexx, Nine West and Sandro. 48 brands and retailers (32%) are scoring in the bottom 0–10% range overall, compared to 32 brands and retailers (32%) last year – showing that many brands and retailers are still lagging far behind, disclosing very little about their social and environmental practices.

## Many more brands and retailers are disclosing their suppliers

37% of the brands and retailers are publishing a list of their manufacturers (tier 1), up from 32% of the brands in 2017 and 12.5% in 2016. These supplier lists have become a lot more detailed too, including information such as factory street address, types of products they make and the number of workers. 18% of the brands and retailers are disclosing their processing facilities (tier 2), up from 14% of the brands in the previous year.

Only one brand, which is ASOS, discloses where they source raw materials. No brands were disclosing this information last year.

## Publicly available supplier lists can help fix problems faster

Having quick, immediate access to these supplier lists can be crucial to solving problems swiftly. Transparent disclosure makes it easier for brands, suppliers and workers, trade unions and NGOs to alert brands and retailers when human rights and environmental abuses occur in the places where their products are made. It means that garment workers, unions, and NGOs can call upon brands to ensure that abuses stop and workers get remedies. It is essentially about greater corporate accountability.\*

## More talk about policies and commitments than practices and impacts

Brands and retailers give a lot more time and space to explain their values and beliefs rather than their practices and impacts. On average, the brands and retailers scored 46% in section one, which looks at what information they publish about their policies and commitments. 31 brands (21%) brands and retailers scored more than 80% on policy and commitments and all but 10 brands were publishing at least one policy. However, on average the brands just scored 11% when it comes to traceability and 17% when it comes to publishing procedures and outcomes of supplier assessments.

## Focus on discrimination but little disclosed about addressing gender equality

Over three-quarters of the brands and retailers publish a policy on discrimination both within the company (76%) and in the supply chain (79%). But only about 40% of the brands and retailers publish a policy on equal pay both for their own employees and in their supply chain. Meanwhile, less than half (47%) of brands and retailers disclose the percentage of women in executive and management positions within the company, and only 14% of the brands and retailers publish the annual gender pay gap within the company.

When it comes to workers in the supply chain, of which an estimated 80% are women, only 13% of the brands publish detailed guidance on issues facing female workers in the supply chain and only 5% of the brands disclose any data on the prevalence of gender-based labour violations in their supplier facilities.

## Information shared by major brands and retailers remains difficult to navigate, jargon-heavy and shallow

The disclosure of meaningful information and data by brands and retailers is often buried in company websites, housed on external micro-sites, in 300+ page annual reports or simply not available at all. Brands present information in many different formats, using all sorts of unclear language and industry jargon and presented in an array of different visuals.

## Still a long way to go towards transparency for all brands and retailers

No brand or retailer is scoring above 60% of the total possible points. Whilst we are seeing brands and retailers begin to publish more about their social and environmental efforts, there is still much crucial information that remains concealed.

# FINDINGS AT-A-GLANCE



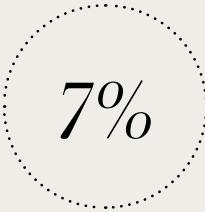
5%

5% average increase of 98 brands' scores since last year



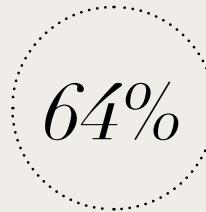
15%

22 brands have increased their traceability score by more than 10%



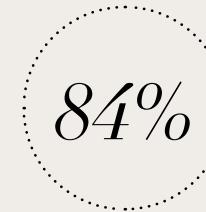
7%

7% average increase in transparency on governance across 98 brands since last year



64%

64% of brands have disclosed more policies and commitments than they did last year



84%

84% of brands have increased their score since last year



12%

12 brands disclose next to nothing, and 12% of brands score less than 3%

## TOP 5 BIGGEST MOVERS

- +22% The North Face**
- +22% Timberland**
- +22% Wrangler**
- +19% C&A**
- +18% ASOS**



28%

28% of brands have scored 31% or higher this year, compared to 20% amongst brands last year

1

# WHY TRANSPARENCY?



# WHY GREATER TRANSPARENCY IS IMPORTANT IN THE FASHION INDUSTRY

*When the Rana Plaza building collapsed five 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 linked to the five garment factories in the building.*

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

## Fragmented supply chains obscure accountability

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

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



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



[Bottom]  
‘Site of the Rana Plaza factory collapse’  
by Dorothee Baumann-Pauly

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

A brand might place an order with one supplier, who carves up the order and subcontracts the work to other factories. This happens regularly across the industry and makes it extremely difficult to monitor human rights and environmental impacts. Unauthorised subcontracting causes workers to become effectively invisible in the supply chain, and this is where the highest risk of human rights violations and environmental degradation tends to occur. But these subcontracted facilities are not the only places where poor conditions persist; sometimes it's right under our noses in manufacturers and communities close to home too.

### Lack of transparency costs lives

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

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

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

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

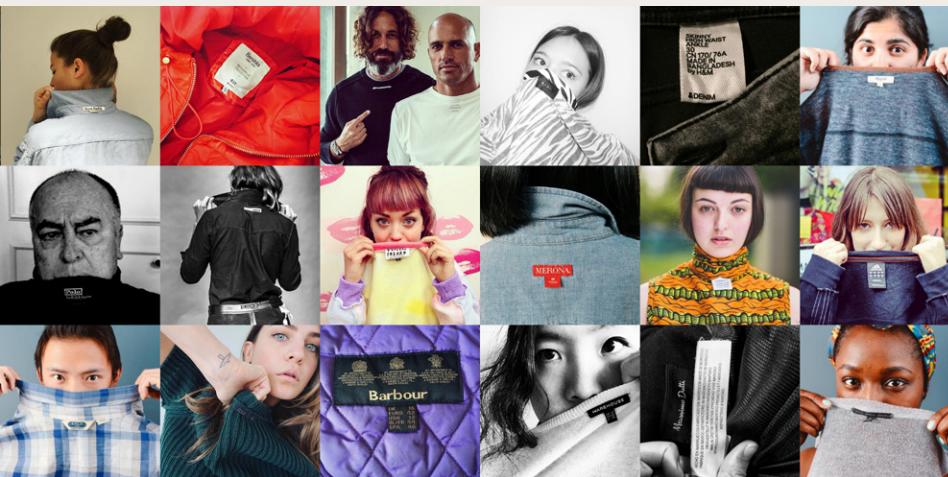
This is why we are still calling for a revolution of the fashion industry. Never again should a tragedy like Rana Plaza happen, yet factory fires, safety accidents and faulty buildings continue to harm people in the places where our clothes are made. Pollution and waste created as a result of the way our clothes are produced and consumed continues to damage the environment.



**"In a survey of over 10,000 consumers from around the world, 78% said it is somewhat or very important for a company to be transparent."**

HAVAS

FEBRUARY 2016



### People want to know #whomademyclothes

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

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

People are increasingly asking for greater transparency from the fashion industry. In 2018, more than 2.5 million people across the world participated in Fashion Revolution through events, posting on social media, viewing our videos or downloading resources from our website.

Over 113,000 posts using our hashtags, including [#whomademyclothes](#), reached 533 million impressions during April 2018 alone – an increase of almost 250% on the previous year.

### Transparency helps mitigate human rights and environmental violations

As Jenny Holdcroft, the Assistant General Secretary of [IndustriALL Global Union](#), explained in last year's 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 the issues."

Increased transparency and accountability means issues along the supply chain can be addressed and solutions found faster. But it also means positive examples and positive stories can be highlighted, shared and potentially replicated elsewhere<sup>1</sup>.

1. As explained by Human Rights Watch: [www.hrw.org/news/2016/09/08/gap-inc-joins-global-brands-publish-factory-list](http://www.hrw.org/news/2016/09/08/gap-inc-joins-global-brands-publish-factory-list)

**"If unions and workers in Bangladesh have a list of where brands are manufacturing, it is so much easier for us to resolve problems quickly. We don't need to do big public campaigns, we can address issues directly with brands. Having access to supplier lists also helps unions know where best to focus our organising efforts.**

**The disclosure of other types of data is useful too. For example, disclosing information about working conditions helps us better understand and solve issues facing women workers in Bangladesh, such as health, childcare, maternity rights, female leadership and living conditions and wages.**

**Ultimately, everybody should be more transparent. Fashion brands and retailers, governments, trade unions and suppliers need to respect and trust each other and work together with openness and honesty."**

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**NAZMA AKTER**  
BANGLADESHI TRADE UNIONIST AND  
FOUNDER OF THE AWAJ FOUNDATION



# VIEWPOINT: A CONTINUED NEED FOR TRANSPARENCY IN THE FASHION SUPPLY CHAIN



**CHRISTINA HAJAGOS-CLAUSEN**  
DIRECTOR, TEXTILE AND GARMENT INDUSTRY  
AT INDUSTRIALL GLOBAL UNION

2017 saw an increase of global brands and retailers publicly releasing some information about their supply chain: factory location, the name of the parent company, types of products made, number of workers, and if the company has authorized any subcontracts from the facility. This a step in the right direction that contributes to a new norm for global supply chain transparency.

With over 100 plus companies disclosing, it is now time to turn to the thousands of other brands who are shirking their responsibilities to the workers who make their clothes and to their customers and demand that they too go transparent.

Transparency of a company's manufacturing supply chain better enables a company to identify and assess actual or potential adverse human rights impacts. This is a critical step that strengthens a company's due diligence. It is also a needed step for workers who make the world's clothes and a needed step for customers.

Being transparent with information on production is important for workers and their unions as it allows for human rights conflicts to be settled in an efficient manner by opening up a channel back to the sourcing brand. This allows workers and their unions to use multiple brands' leverage to remedy human rights violations.



Yes garment factory in Yangon, in March 2018 © IndustriALL Global Union

**“Transparency not only provides a link between workers and customers, but it provides workers and their unions the needed information to advocate on their behalf when resolving conflicts.”**

For workers and their unions, transparency in the supply chain is a vital tool to ensure that the burden of proof rests with the global brands to ensure that their clothes are manufactured in an environment that is free of human and labour rights violation. With the knowledge of which brands are sourcing from their factory, workers and their unions can be active in the monitoring of their own workplace.

# VIEWPOINT: THE BUSINESS CASE FOR MORE TRANSPARENCY



DEBBIE COULTER  
ACTING HEAD OF KNOWLEDGE & LEARNING  
ETHICAL TRADING INITIATIVE

*These last 18 months have seen strong momentum behind the disclosure of supply chain information in the apparel sector.*

This is a very positive development, and as of February 2018, about a quarter of Ethical Trading Initiative's apparel members had already made the move to publishing at least their Tier 1 supplier lists.

But, this momentum has also resulted in transparency being sometimes held up as a universal remedy, without proper agreement over what it means, or with evidence of positive outcomes for workers employed in supply chains.

That's why [Ethical Trading Initiative](#), and other organisations such as Human Rights Watch, have recently been doing more work to clarify the benefits brands can get from becoming more transparent. These benefits include building trust with customers and investors, supporting commercial performance and facilitating access to capital.

Crucially, greater transparency can help brands engage and collaborate with trade unions and other civil society organisations; the disclosure of supplier lists can facilitate the escalation of a labour rights issue by local trade unions directly to brands, an issue that a standard factory audit may have failed to identify.

Yet we must not forget that we are still at an early stage. In order to scale up transparency and speed up this movement beyond the "early adopters," we need to continue to work on capturing the evidence of positive outcomes for workers as well as brands and retailers.

Additionally, we need to clarify what robust and meaningful transparency means beyond publishing supplier lists. We also need to further demystify the issue of greater transparency and look at the implications for apparel companies of different sizes and different business models. These are some of the topics that Ethical Trading Initiative is exploring with its company, trade union and NGO members as part of its 2020 strategy.

**"Transparency can help companies embed better working practices internally, as being more transparent means holding up a mirror to their own practices."**

# WHAT DO WE MEAN BY TRANSPARENCY?

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

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

## **Transparency should enable greater accountability**

Transparency is not just sharing the good stories nor disclosing only compliant, well-performing suppliers – it's about presenting the full picture, both good and not-so-good, in an effort to allow for greater scrutiny by those affected and interested, and to help drive faster improvements.

This sort of transparency requires brands and retailers to know exactly who makes the products they sell – from who stitched them right through to who dyed the fabric and who farmed the cotton. And crucially, this requires brands to trace the journey of their products right down to the raw material level. We are asking them to share this information publicly as an important move towards greater transparency and accountability.

# TRANSPARENCY



**Transparency is not selective disclosure to third parties as opposed to public disclosure**

Some brands opt to disclose supply chain information to selected NGOs or unions rather than publicly, and have done so for many years in order to manage their supply chain risks. However, we feel this is not enough. Health and safety incidents, widespread abuses and even deaths are still happening, despite this industry-facing disclosure.

**“The knowledge that important information is being kept from people undermines trust and creates greater uncertainty.”**

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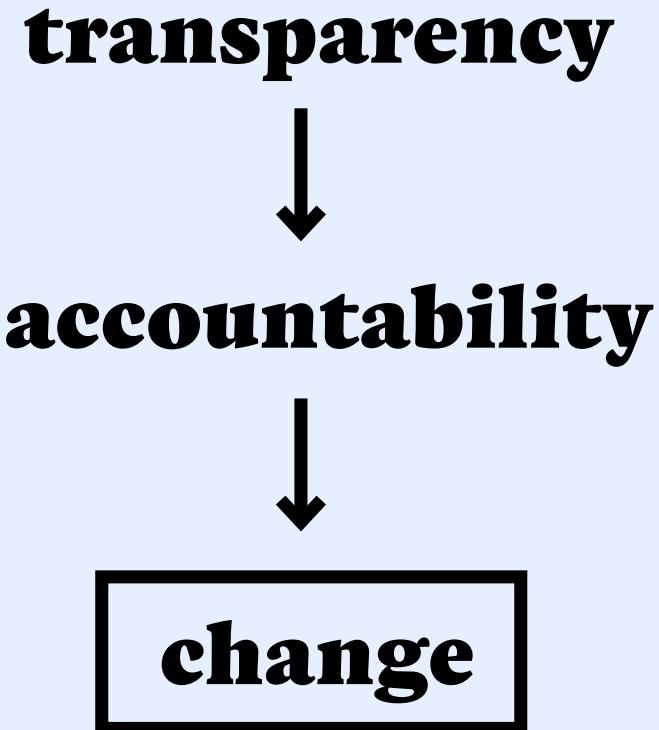
**EMILY O'REILLY**

EUROPEAN OMBUDSMAN, 2017

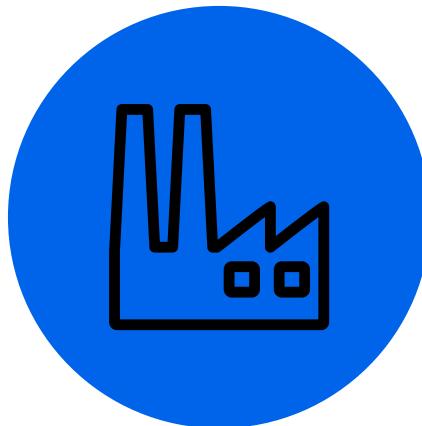
**Transparency is a means to change, not an end**

Transparency alone is not enough to fix the industry's problems, but it is a necessary first step towards wider systemic change. We each need to act upon the wealth of information that is being disclosed in order to hold brands and retailers, governments and suppliers to account.

Ultimately, Fashion Revolution believes that the fashion industry as a whole needs a radical paradigm shift and the way that most clothing is produced and consumed will need transformation. This means business models will need to change in a big way and a multiplicity of solutions will likely be needed. Transparency helps to reveal the industry's problems and identify potential solutions so that we can all better understand how to change it.

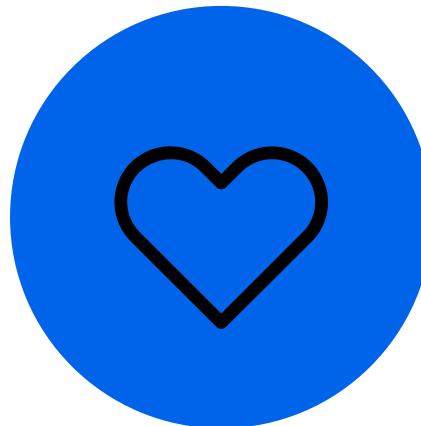


# TO ACHIEVE CHANGE WE RECOGNISE 4 IMPORTANT THINGS:



## It's a process

It is going to be a long journey towards a different industry model, requiring many incremental but necessary steps, to turn the tide of fast fashion or other unsustainable business models. We believe the first step is greater transparency. This will take consumers, brands and retailers, governments and citizens in supply chains each taking action. Fashion Revolution is engaging with all of these groups to catalyse positive change.



## Inclusivity is key

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



## More information is needed

Many people continue to shop from big corporate brands, but want more tools to understand how products are made, where they are made, by whom and under what conditions.

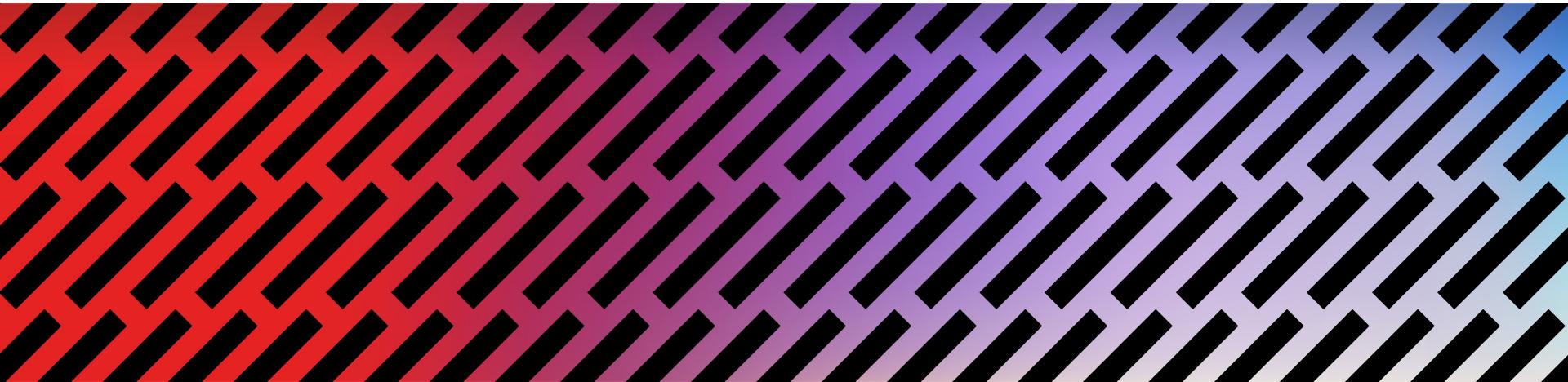


## Turn data into action

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

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# ABOUT THE FASHION TRANSPARENCY INDEX



# WHY HAVE WE CONDUCTED THIS RESEARCH?

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

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

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

What information should we expect to find about these big brands' policies and procedures when it comes to social and environmental issues? What can we find out about the effects of brands' practices on the people who work in their supply chains? These are some of questions the Fashion Transparency Index considers.



**Furthermore, we wanted to create:**

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

**"Our aim is to better understand the social and environmental information shared by big brands and retailers. We will use this information to drive positive change."**

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**SARAH DITTY**  
HEAD OF POLICY, FASHION REVOLUTION

# THE METHODOLOGY

The Fashion Transparency Index uses a ratings methodology to benchmark brands' and retailers' public disclosure across five key areas, including: policy and commitments, governance, supply chain traceability, supplier assessment and remediation, and new 'spotlight issues' covering living wages, unionisation and collective bargaining, waste and recycling, and women, gender equality and female empowerment. We are only looking at information and data that is publicly disclosed by brands and retailers themselves.

1.

## POLICY & COMMITMENTS

- What are the brand's social and environmental policies?
- How is the brand putting its policies into practice?
- How does the brand decide which issues to prioritise?
- What are the brand's future goals for improving its impacts?

2.

## GOVERNANCE

- Who in the brand is responsible for the brand's social and environmental impacts?
- How can they be contacted?
- How does the brand incorporate human rights and environmental issues into its buying and sourcing practices?

3.

## TRACEABILITY

- Does the brand publish a list of its suppliers, from manufacturing to raw material level?
- If so, how much detail do they share?

4.

## KNOW, SHOW & FIX

- How does the brand assess the implementation of its supplier policies?
- How does the brand fix problems when found in its supplier facilities?
- Does the brand report assessment findings?
- How can workers report grievances?

5.

## SPOTLIGHT ISSUES

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

# WEIGHTING OF THE SCORES

The methodology focuses exclusively on public disclosure of supply chain information. Therefore, the weighting of the scores is intended to emphasise increasing levels of detailed disclosure, especially when it comes to publishing supplier lists and the results of supplier assessments. We are rewarding granularity.

Please be aware that when brands score zero on an individual indicator, it doesn't necessarily mean anything bad. It just means they're not disclosing their efforts publicly.



# ABOUT THE METHODOLOGY

The first methodology was created by Ethical Consumer in 2016 with input from Fashion Revolution. For 2017, Fashion Revolution took the lead on the project's development and considerably revised the methodology. We spent four months consulting a diverse group of more than 20 industry experts on this revision process. The new methodology focuses exclusively on public disclosure of supply chain information, and we changed the weighting of the scores to emphasise increasing levels of detailed disclosure, especially in regards to disclosing supplier information. We have updated the methodology again in 2018, making small changes for clarity and selecting new 'Spotlight Issues.'

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

- **Dr Mark Aner**, Director of Centre for Global Workers' Rights at Penn State University
- **Neil Brown**, Alliance Trust Investments
- **Professor Ian Cook**, University of Exeter
- **Orsola de Castro**, co-founder of Fashion Revolution and waste expert
- **Subindhu Garkhel**, Fairtrade Foundation
- **Jenny Holdcroft**, IndustriALL
- **Dr Alessandra Mezzadri**, SOAS, University of London
- **Joe Sutcliffe**, Advisor – Dignified Work, CARE International
- **Heather Webb**, Ethical Consumer
- And several others experts who wished to remain anonymous at this time.

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

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

For further detail of the exact methodology, download the 2018 [brand questionnaire template](#).

## How does the 2018 methodology differ from last year?

Small tweaks and changes have been made to the 2018 methodology, building on the 2017 methodology revision process. In the first four sections, the methodology has seen minor tweaks in order to clarify the wording. Section five "Spotlight Issues" change focus each year, and this is where readers might notice changes.

This year, the "Spotlight Issues" are "Women. Workers. Waste." Fashion Revolution's team has chosen these three areas of focus to align with our forthcoming work on the UN Sustainable Development Goals. The scoring in each of the five sections has been adjusted only very slightly to accommodate the tweaks and new Spotlight Issues. We don't expect these changes to have a large overall impact on the ability to compare trends and progress year-on-year, but the changes do affect direct comparability of data year-on-year at a more granular level.

# HOW WERE THE 150 BRANDS SELECTED?

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

We relied on publicly available financial information to select brands and retailers. Some companies are privately held and do not publish financial records, including turnover, which means we may have been unable to include them in this edition. Where brands are part of a parent company with annual turnover over US\$500 million, we have selected the brand or brands that appear to make up the most significant part of their business.

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

98 of the brands in the 2018 report were included in last year's report, meaning there are 52 new brands this year. We intend to expand the number of brands and retailers included in next year's edition.

# A-Z OF BRANDS

Abercrombie & Fitch	George at ASDA (Walmart)	Nike
Adidas	Gildan Activewear	Nine West
Aéropostale	Giorgio Armani	Nordstrom
Amazon	Gucci (Kering Group)	Old Navy (Gap Inc.)
American Eagle	GUESS?	OVS
ANTA Sports (ANTA International)	H&M	Pernambucanas
Anthropologie (URBN)	Hanes	Prada
Armani	Heitlan Horne	Primark (Associated British Foods)
Asics Corporation	Hermès	Pull&Bear (Inditex)
ASOS	Hudson's Bay (HBC)	Puma (Kering Group)
Banana Republic (Gap Inc.)	Hugo Boss	Ralph Lauren
Barney's	Jack & Jones (Bestseller)	Reebok (Adidas)
Benetton	JCPenney	Ross Stores
Bershka (Inditex)	J.Crew	Renner
Bloomingdale's (Macy's)	JD Sports	Ross Stores
bonprix (Otto Group)	Jordan (Nike, Inc.)	Russell Athletic (Fruit of the Loom)
Bottega Veneta (Kering Group)	Jessica Simpson (Sequential Brands Group)	s.Oliver
Brooks Brothers	Joe Fresh (Loblaw)	Sainsburys - Tu Clothing
Burberry	John Lewis	Sak's Fifth Avenue (HBC)
Burlington	Jordan	Salvatore Ferragamo
C&A	Kate Spade (Tapestry, Inc)	Sandro (SMCP)
Calvin Klein (PVH)	Kik (Eengelmann)	Sports Direct
Calzedonia	Kohl's	Stradivarius (Inditex)
Carolina Herrera (Puig Group)	Lacoste	Superdry (Supergroup)
Celine	Lands' End	Takko (Hettlage group)
Champion (HanesBrands)	Levi Strauss & Co	Target
Chanel	Lidl UK (Lidl Stiftung & Co. KG)	Tchibo
Chico's	Lindex (Stockmann)	Tesco F&F
Claire's Accessories	Liverpool (El Puerto de Liverpool)	The Buckle
COACH (Tapestry, Inc)	LL Bean	The North Face (VF Corp)
Columbia Sportswear	LOFT	Timberland (VF Corp)
Converse (Nike, Inc.)	Longchamp	TJ Maxx (T.J.X.)
Cortefiel (Grupo Cortefiel)	Louis Vuitton (LVMH)	Tommy Hilfiger (PVH)
Costco	Lululemon	Topshop (Arcadia Group)
Debenhams	Macy's	Tory Burch
Decathlon	Mango	Triumph
Desigual	Marc Jacobs (LVMH)	Under Armour
Dick's Sporting Goods (Conetic)	Marks & Spencer	Uniqlo (Fast Retailing)
Diesel (OTB Group)	Massimo Dutti (Inditex)	Urban Outfitters
Dillard's	Matalan	Valentino
Dior	Max Mara (MMFG)	Van Heusen (PVH)
Dolce & Gabbana	Mexx (Eroglu)	Vans (VF Corp)
Dressman (Varner Group)	Michael Kors	Vero Moda (BESTSELLER)
El Corte Inglés	Miu Miu (Prada Group)	Versace
Ermengildo Zegna	Monoprix (Group Casino)	Victoria's Secret
Esprit	Monsoon Accessorize	Walmart
Express	Neiman Marcus	Wrangler (VF Corp)
Falabella Inversiones (Falabella Ltda.)	New Balance	Youngor
Fendi (LVMH)	New Look	YSL (Kering Group)
Foot Locker	New York & Co.	Zalando
Forever 21	New Yorker	Zara (Inditex)
G-Star	Next	
Gap		

\*In general, the scores for brands that are part of a parent company apply to all of the subsidiaries in the parent company, not just the brands included in this report. There are some exceptions: for example, George at ASDA and Walmart; Puma and the other Kering Group brands, Lidl UK.

# HOW DOES THE SCORING WORK?

## How do brands and retailers receive points?

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

- On the company's website(s);
- In annual reports or annual sustainability/CSR reports (only counted if dated January 2016 or later) published on the company website(s);
- In any other documents which are publicly available and can be downloaded freely from the company's website(s);
- Via third party websites but only when linked to directly from the company's own website (i.e. there is a direct link from the company's website to the third party website.)

The weighting of the scores is intended to emphasise increasing levels of detailed disclosure; we are rewarding granularity.

## What else to note about the scoring?

Brands' and retailers' individual scores are not as important as the ranges in which they have scored.

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

Although we have designed the methodology to be as objective and comparable as possible, there is a degree of human interpretation required for each question. Furthermore, there is no common template that brands and retailers use for reporting on social and environmental issues.

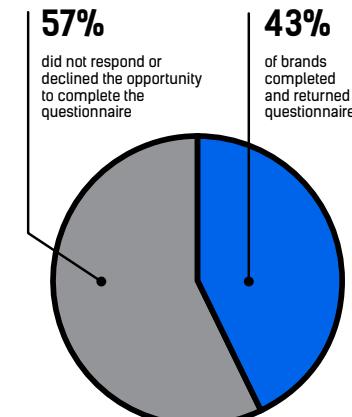
Many companies produce annual reports that span 200–400 pages; as such, there is a notable margin for human error. It is not always possible to catch everything. However, our research team endeavoured to be as thorough, accurate and fair as possible. All averages in this report represent the mean.

## How is the research conducted?

The Fashion Transparency Index uses only publicly disclosed information about each brand's policies, procedures, performance and progress on human rights and environmental issues across its supply chains. We rely solely on information available on the brands' websites, in their annual reports (published January 2016 or later), or via third party websites when linked to directly from the brands' website.

We also sent each brand a questionnaire in order to help us identify where information is publicly disclosed and to clarify information we found through our team's own research. Brands were given approximately one month to complete the questionnaire. The completed questionnaires were analysed by our research team and scores were awarded where appropriate.

### QUESTIONNAIRE RESPONSE



The research was conducted by Sarah Ditty, Carry Somers, Aidan Shaw, Ilishio Lovejoy, Fionnuala Walravens, Aphra Kennedy-Fletcher, Eduardo Iracheta and Michelle Lai with further support from Lowell Chow and Sienna Somers between January and April 2018.

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

Should you know of any remaining inaccuracies, please contact us at [sarah@fashionrevolution.org](mailto:sarah@fashionrevolution.org) and we will take this into account for the next edition.

## What is the scope of the research?

The Fashion Transparency Index has been designed to give an illustrative look at how much brands know and share about their supply chains. We have deliberately chosen to focus specifically on transparency by means of public disclosure and not everything that brands and retailers are doing internally or otherwise behind-the-scenes across their companies and supply chains. Brands and retailers may very well have excellent policies and programmes in place internally, but if they're not shared publicly then they're not counted here.

## What is beyond the scope?

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

Verification of claims made by brands and retailers is beyond the scope of this study. We have designed the methodology to provide insights that reveal patterns of disclosure, are comparable over time and allow brands to see where they stand on transparency compared to their peers.

## Limitations of the research

Our team researched and scored brands regardless of whether they completed the questionnaire or not. However, brands that completed the questionnaire were more likely to receive a higher score simply because our researchers will have been alerted to further information we hadn't already found ourselves.

However, there are limits to desk-based research, and only on-the-ground research by NGOs, unions and academics can reveal the true impacts of brands' policies and practices in real-world situations. By encouraging brands and retailers to become more transparent, the Fashion Transparency Index hopes to facilitate the excellent work of NGOs, unions and academics doing this type of on-the-ground, in-country work.



# 3 **THE FINAL SCORES**

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



# A ROUGH GUIDE TO THE SCORING

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

**0–10%**      **11–20%**      **21–30%**      **31–40%**      **41–50%**      **51–60%**      **61–70%**      **71–80%**      **81–90%**      **91–100%**

**TRANSPARENCY**

Brands scoring between 0–5% are disclosing nothing at all or a very limited number of policies, which tend to be related to the brand's job hiring practices or local community engagement activities.

Brands scoring between 5–10% are likely to be publishing some policies for both its own employees and suppliers. Those closer to 10% are likely to be publishing a basic supplier code of conduct and some detailed information about their procedures and possibly supplier assessment process.

Brands scoring between 11–20% are likely to be publishing many policies, some procedures and some information about their supplier assessment and remediation processes. These brands will most likely not be publishing supplier lists.

Brands scoring between 21–30% are likely to be publishing much more detailed information about their policies, procedures, social and environmental goals and supplier assessment and remediation processes. These brands will be publishing a supplier list but not with many details other than factory name and address. These brands will not widely be disclosing information on the "Spotlight Issues."

Brands scoring between 31–40% are the brands who are publishing suppliers lists as well as detailed information about their policies, procedures, social and environmental goals, supplier assessment and remediation processes. These brands are also more likely to be addressing a few of the Spotlight Issues such capacity building for female supply chain workers, collective bargaining and/or textile and clothing waste.

Brands scoring over 40% are those who are most likely to be publishing more detailed supplier lists, some will be publishing processing facilities as well as manufacturers – in addition to detailed information about their policies, procedures, social and environmental goals, supplier assessment and remediation processes and general assessment findings. These brands are also more likely to be addressing the Spotlight Issues such as the gender pay gap, capacity building for female supply chain workers, collective bargaining and/or textile waste and circular resources.

Brands scoring 51–60% are disclosing all of the information already described in the other ranges and will be publishing detailed supplier lists which include manufacturers as well as processing facilities. These brands will be publishing the vast majority of policies, procedures and future goals.

**No brands score above 60%** but if they did these brands would be disclosing all of the information already described as well as publishing detailed information about assessment and remediation findings for specific facilities and detailed supplier lists from manufacturing right down to raw materials. These brands would be disclosing the number of workers in their supply chain covered by collective bargaining agreements or part of independent democratically-elected trade unions. These brands would be mapping social and environmental impacts into their financial business model. We would be able to find details about the company's gender pay gap, number of women in executive and management roles and how women's issues are being addressed in the supply chain.

# THE FINAL SCORES

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Amazon	10	Superdry	20	George at ASDA	30	Calvin Klein	38	ASOS	50
Ross Stores	10	Jack & Jones	20	New Look	29	Tommy Hilfiger	38	Levi Strauss & Co	47
Monsoon Accessorize	9	Vero Moda	20	bonprix	29	Van Heusen	38	The North Face	46
Triumph	9	Salvatore Ferragamo	20	New Balance	29	Hugo Boss	38	Timberland	46
Valentino	9	Victoria's Secret	19	LOFT	29	Lindex	37	Vans	46
Takko	9	GUESS?	19	Uniqlo	29	Gucci	37	Wrangler	46
Armani	8	Mango	18	Zalando	27	Bottega Veneta	36	G-Star	45
Kohl's	8	Bloomingdale's	18	Asics Corporation	26	YSL	36	Tchibo	42
Michael Kors	7	Macy's	18	Topshop	26	Converse	36	Bershka	42
Express	7	TJ Maxx	18	Hermès	26	Jordan	36	Massimo Dutti	42
Sainsburys - Tu Clothing	7	Nordstrom	17	Walmart	25	Nike	36	Pull & Bear	42
Calzedonia	6	Russell Athletic	17	Dressman	24	Primark	36	Stradivarius	42
Forever 21	6	Decathlon	17	Champion	24	Lululemon	35	Zara	42
Lacoste	6	Falabella	16	Hanes	24	Benetton	35		
Anthropologie	6	JCPenney	16	John Lewis	24	Target	35		
Urban Outfitters	6	Kik	16	OVS	23	Gildan Activewear	33		
Neiman Marcus	6	Fendi	15	Debenhams	23	Burberry	33		
Aéropostale	5	Cortefiel	15	Columbia Sportswear Co	22	Next	33		
Sports Direct	5	Costco – Kirkland Signature	15	Hudson's Bay	22	Tesco – F&F	31		
Carolina Herrera	5	Lidl UK	15	Sak's Fifth Avenue	22				
Ermengildo Zegna	5	Miu Miu	15	Under Armour	22				
Foot Locker	5	Prada	15	COACH	21				
Matalan	5	American Eagle	15	Lands' End	21				
Versace	4	Louis Vuitton	15						
Diesel	4	Marc Jacobs	14						
Tory Burch	3	Abercrombie & Fitch	14						
Chanel	3	Ralph Lauren	14						
LL Bean	3	J.Crew	13						
Youngor	3	Monoprix	13						
ANTA Sports	2	El Corte Inglés	13						
New York & Co.	2	JD Sports	13						
Claire's Accessories	2	Kate Spade	12						
Dolce & Gabbana	1	Burlington	12						
Brooks Brothers	1	Dick's Sporting Goods	12						
New Yorker	1	Joe Fresh	12						
Longchamp	0	Chico's	11						
Max Mara	0	Dillards	11						
Barney's New York	0	The Buckle	11						
Desigual	0								
Dior	0								
Heilan Home	0								
Jessica Simpson	0								
Liverpool	0								
Mexx	0								
s. Oliver	0								
Nine West	0								
Sandro	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

# OVERALL ANALYSIS

## Still a long way to go towards transparency

The overall average score amongst the 150 brands and retailers is 21%, or 52 out of 250 total possible points – a 1% increase in transparency from the 2017 results. This shows that there is still a long way for major brands and retailers to go towards transparency.

However, these overall averages should not be read as 'little to no improvement' by the brands and retailers in this Index. We have reviewed dozens of extra companies this year, which were not included in last year's report, and thus the overall average score doesn't reflect the fact that 16 brands and retailers have increased their level of transparency by over 10% this year.

When we compare the 98 brands and retailers\* that were included in both the 2017 and 2018 Fashion Transparency Index, we have seen these brands and retailers increase their level of transparency by an average of approximately 5% overall and across each section of the methodology.

## Ten brands and retailers lead the path towards greater transparency amongst the major corporate players

Adidas and Reebok top the Index again this year at 58% followed by Puma, H&M, Esprit, Banana Republic, Gap, Old Navy, C&A and Marks & Spencer in the 51–60% range. ASOS is shortly behind at 50% having significantly increased their level of disclosure since last year, followed by Levi Strauss & Co and then The North Face, Timberland, Vans, Wrangler (all owned by VF Corp.), G-Star, Tchibo and Bershka, Massimo Dutti, Pull & Bear, Stradivarius and Zara (all owned by Inditex) in the 41–50% range.

## Dozens of big brands and retailers making efforts to be more transparent

This year, 65 brands and retailers (or 43%) have scored 21% or higher – above the mean average score – compared to 43 brands and retailers (or 43%) in 2017. 42 brands and retailers (or 28%) have scored 31% or higher, compared to 20 brands and retailers (or 20%) in 2017.

This is positive news and indicates that many major brands and retailers are making significant efforts to share more information about their suppliers and social and environmental policies and practices.

## Major luxury brands move towards transparency

In the past two years of conducting this research, we have seen the luxury brands publicly disclose less about their social and environmental policies and practices than other major brands and retailers, but we are starting to see this trend change. Taking a look at the premium and luxury brands included in this year's report, we see that Hugo Boss, Calvin Klein, Tommy Hilfiger, Gucci, Bottega Veneta, YSL and Burberry score in the 31–40% range, with Hugo Boss increasing its score by 11%, Calvin Klein and Tommy Hilfiger increasing their score by 9% and Gucci, Bottega Veneta and YSL increasing their score by 8% this year. Hugo Boss, Calvin Klein and Tommy Hilfiger are the only premium/luxury brands to have published a list of their Tier 1 suppliers, whilst Hermès is disclosing both Tier 1 and processing facilities.

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

+22%	The North Face
+22%	Timberland
+22%	Wrangler
+19%	C&A
+18%	ASOS
+17%	Esprit
+16%	Benetton
+12%	Levi Strauss & Co.
+12%	Primark
+12%	Next
+12%	New Balance
+11%	LOFT
+11%	Hugo Boss
+11%	Under Armour
+11%	Lululemon
+11%	Zalando

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

\* Brazilian brands Pernambucanas and Renner were excluded from the 2018 report as they will instead be included in the forthcoming Fashion Transparency Index Brazil report, due out later in 2018

## Too many big brands and retailers continue to lack transparency

12 brands and retailers (8%) have scored 0% in 2018, compared to three (3%) in the 2017 report. These brands and retailers' lack of disclosure brings down the overall average score, despite many brands disclosing considerably more information this year compared to 2017.

Dior, Heilan Home and s.Oliver continue to disclose nothing, and this year we are seeing next to nothing from Barney's New York, Desigual, Jessica Simpson, Longchamp, Liverpool, Max Mara, Mexx (who at the time of researching did not have an active website), Nine West and Sandro.

25 brands and retailers (17%) have scored less than 5% this year, compared to nine brands and retailers (9%) in 2017. 48 brands and retailers (32%) are scoring in the bottom 0–10% range overall, compared to 32 brands and retailers (32%) last year – showing that many brands and retailers are still lagging far behind, disclosing very little about their social and environmental practices. Even if they are doing good things 'behind-the-scenes,' they are not sharing this information publicly.

## Where has transparency amongst the brands and retailers changed the most?

In positive news, far more brands and retailers are publishing a list of their suppliers. 55 of the 150 brands

are publishing a list of their Tier 1 factories – in other words, where their clothes are typically cut, sewn and completed. This means 37% of brands and retailers in this report are disclosing who their suppliers are, up from 32% last year (32 brands in 2017).

These supplier lists have become a lot more detailed too, including information such as factory street address, types of products they make and the number of workers. More brands and retailers are also publishing a list of their processing facilities – 27 brands (18%) this year versus 14 brands (14%) in 2017. We dig into the details later on pages 44–45.

Many more brands and retailers are sharing the name (55% in 2018; 43% in 2017) and direct contact details of the person with lead responsibility for social and environmental performance in the company (24% in 2018; 15% in 2017).

More brands and retailers (12% in 2018; 7% in 2017) – but still very few – are disclosing how company employees' (e.g. sourcing team, buyers, designers) incentives are tied to improvements in human rights and environmental management.

Interestingly, there has been a notable increase in brands and retailers that are publishing anti-bribery and corruption policies both for the companies' workforce and for their suppliers. We are not sure why this is the case and may be worth looking into in the future.

Finally, 62% of brands and retailers (up from 40% in 2017) are disclosing

their process for fixing problems when violations are found in a supplier facility.

## Less than half the brands and retailers publish an equal pay policy and even fewer disclose gender pay gap

Approximately 40% of the brands and retailers publish a policy on equal pay both for their own employees and in their supply chain. Meanwhile, less than half (47%) of brands and retailers disclose the percentage of women in executive and management positions within the company, and only 14% of the brands and retailers publish the annual gender pay gap within the company. Those that are publishing the gender pay gap tend to be British companies, which as of 4 April 2018, are required to do so by law.

## Information shared by major brands and retailers remains difficult to navigate, jargon-heavy and shallow

Many of our conclusions from last year's report can be reiterated and emphasised in this 2018 review.

While we are seeing brands begin to publish more about their social and environmental efforts – which is welcome and totally necessary – there is still much crucial information about the practices of the fashion industry that remains concealed. Far more space is still given to brands and retailers' values and beliefs than to their actions and outcomes. When it comes to comprehensive, comparable,

detailed data disclosure, the type of information that enables greater accountability for environmental and working conditions, not enough is being made publicly available.

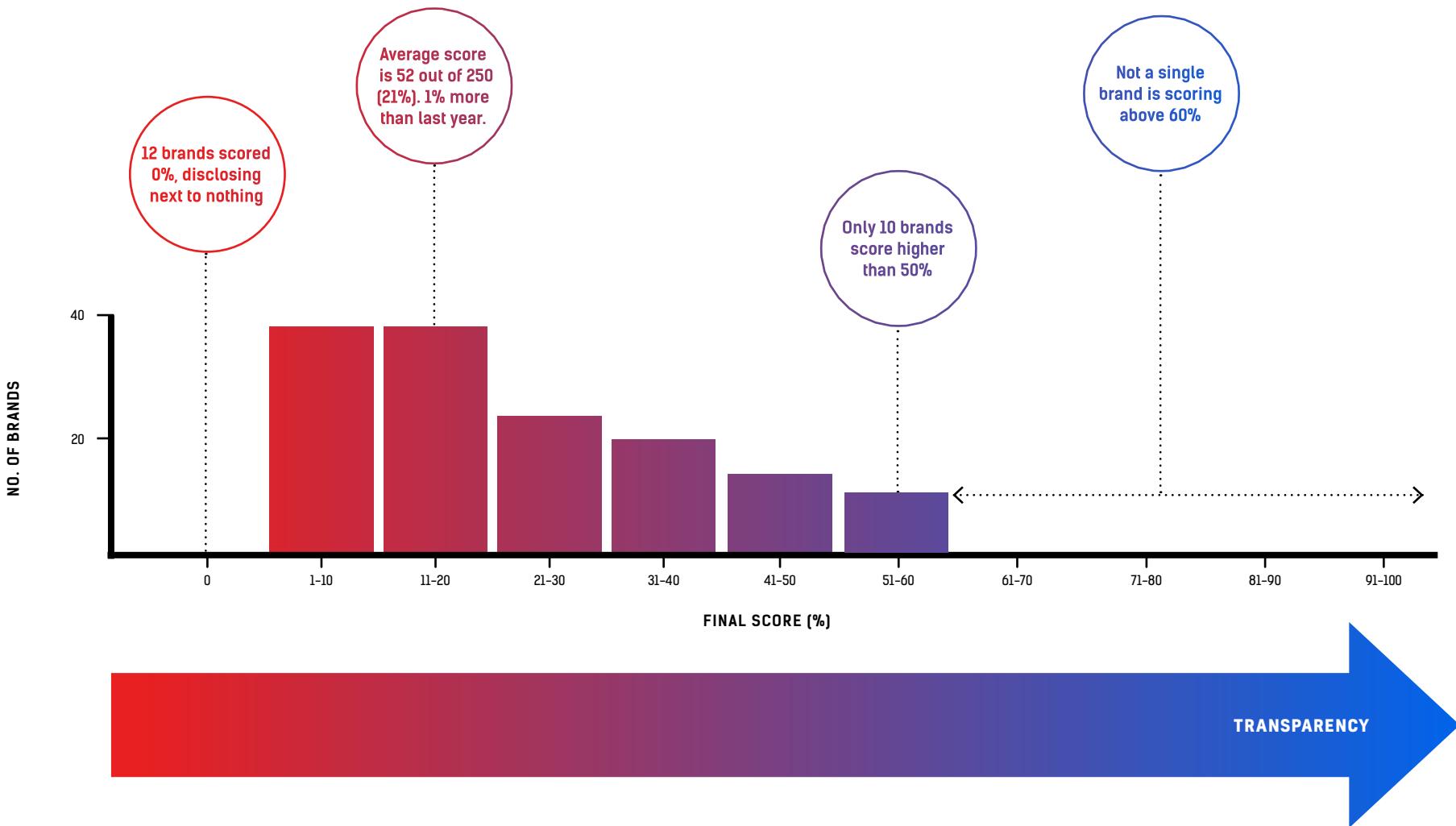
Public disclosure of supply chain information is often buried in brands and retailers' websites, housed on external micro-sites, in 300+ page annual reports or simply not available at all. You would need a lot of time to find the relevant information and would require nuanced knowledge to make sense of the types of information that brands and retailers' typically disclose.

There is still a lack of consistent standards for reporting on social and environmental issues. There is no common template. Brands present information in many different formats, using all sorts of language and industry jargon and present it using an array of different visuals.

No wonder even the most conscious consumers find it all so confusing. How are we supposed to make informed decisions about what we buy when the information is either entirely absent or presented in such varied and diffuse ways?

What is most needed is for governments to legally require that brands and retailers disclose supplier lists and social and environmental information using a common framework. See page 61 for further explanation. Without this, brands will continue to willingly publish only selected information and in whatever format they determine best.

# QUICK FINDINGS



4

# THE SCORES ACROSS THE 5 KEY AREAS



# AVERAGE SCORES ACROSS THE SECTIONS



1.

## POLICY & COMMITMENTS

Gucci is the only brand to score all 48 possible points in this section. There are clearly three ranges where brands' scores are concentrated: 20 or more brands' scores fall in each range 0-10%, 51-60% and 81-90%.

By and large, brands are disclosing the most about their policies and commitments on social and environmental issues.

2.

## GOVERNANCE

The largest number of brands (37) score less than 10%. 19 brands (13%) fall in the 41-50% range. 11 brands (7%) score in the highest range, 91-100%. C&A, Esprit and Marks & Spencer score 100%, meaning that they're disclosing who in the team is responsible for social and environmental issues, along with their contact details, board level accountability, and how other staff and suppliers are incentivised to improve performance.

3.

## TRACEABILITY

More brands are publishing supplier lists this year. 55 brands (37%) are publishing tier 1 suppliers. 27 brands (18%) brands are publishing their processing facilities. Only ASOS is publishing their raw material suppliers too, which makes them the highest scoring brand in this section. G-Star, C&A and the Gap Inc. brands score comparatively well because their supplier lists include detailed information such as types of products/ services and number of workers in each facility.

4.

## KNOW, SHOW & FIX

The highest concentration of brands (52) fall in the 0-10% range disclosing little about their supplier assessment and supplier remediation processes. Banana Republic, Gap and Old Navy (all owned by Gap, Inc.) score highest in the 51-60% range. Brands often disclose their supplier assessment processes and procedures. However, brands share little information about the results of these efforts nor do brands share much about the effects of their efforts to fix problems in factories when found.

5.

## SPOTLIGHT ISSUES

By far the highest number of brands score in the lowest range, 0-10%. Marks & Spencer comes out highest at 60% of total possible points, meaning it publishes the most information about its efforts to address issues such as gender equality, collective bargaining and freedom of association as well as textile recycling, clothing waste and circular resources. Only 10 brands (7%) score higher than 40%.

# 1. POLICY & COMMITMENTS APPROACH

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

### We looked at the following issues:

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

We typically found this information in the following places:

- Brand/retailer commercial website;
- Brand/retailer corporate website;
- Brand/retailer sustainability or CSR microsite;
- Parent company website;
- Brand/retailer or parent company investor relations website (so long as it is web-linked somewhere to the brand/company main website);
- Another external third party website (e.g. online data platform, NGO, data sharing initiative, another benchmark questionnaire) but only when web-linked directly to the brand/retailer or parent company website;
- Annual report published by the brand/retailer and this webpage or website linked to their brand/company main website somewhere (usually PDF or Word doc);
- Sustainability, CSR, human rights or environmental impact reports published by the brand/retailer and this webpage or website linked to their brand/company website main somewhere (usually PDF or Word doc);
- Financial statements published by the brand/retailer and this webpage or website linked to their brand/company main website somewhere (usually PDF or Word doc).

### Social & environmental priorities and goals for the future

In this section, we also looked at whether brands and retailers are disclosing their top human rights and environmental priorities (often in the form of a materiality matrix). Certain issues will be more relevant and of higher risk or importance to brands and its stakeholders than others. We did not award points if brands and retailers count their entire sustainability or Corporate Social Responsibility (CSR) report as a materiality assessment.

We also looked to see whether brands and retailers are publishing their goals or a strategic roadmap for improving social and environmental impacts across the supply chain. We only counted these goals if they were reaching into the future, time-bound and measurable. Brands also scored an additional point if progress was reported annually.

Finally, we looked to see if brands and retailers have their annual sustainability or CSR reports audited by an independent third party organisation, typically done by one of the big global accounting firms.

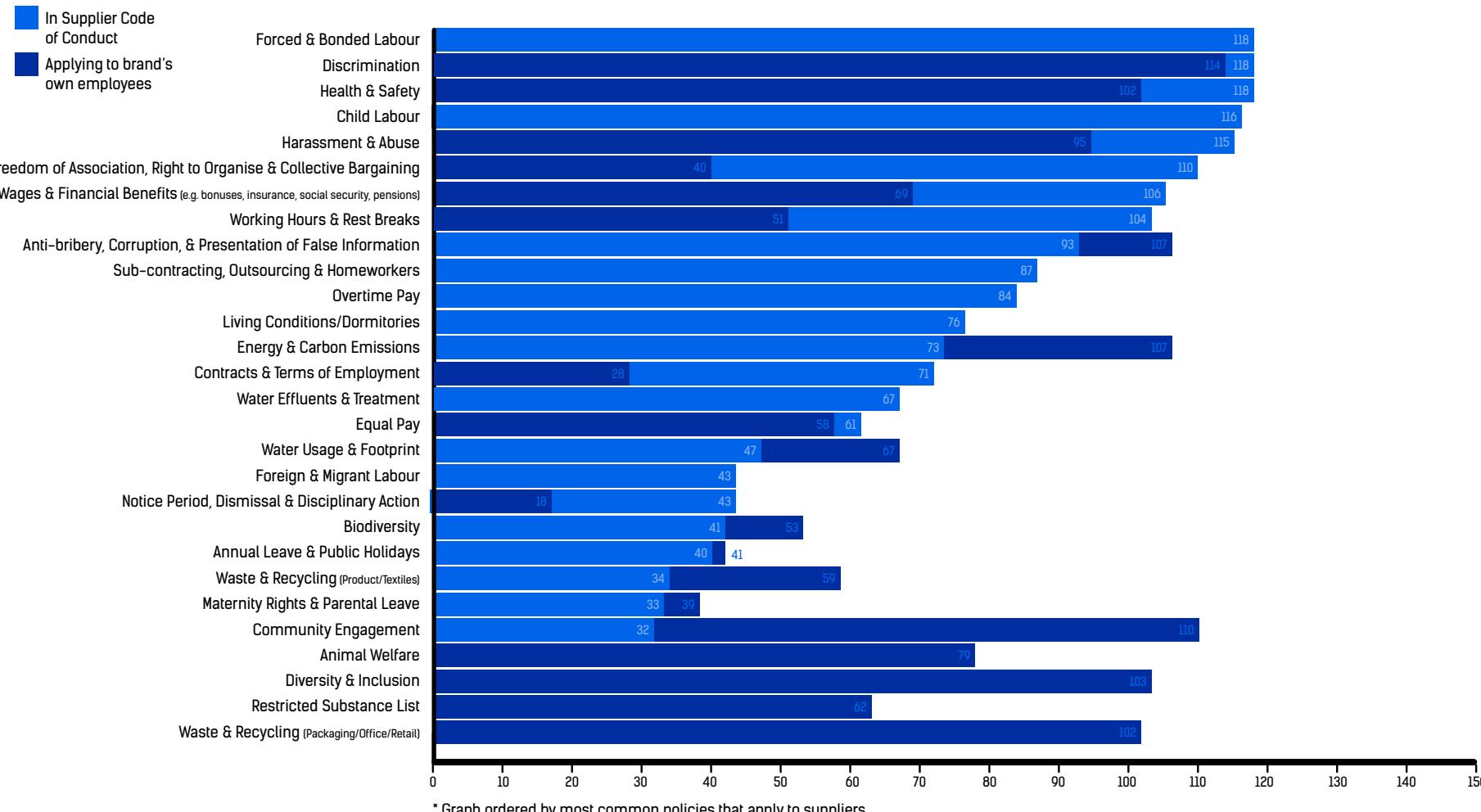
# 1. POLICY & COMMITMENTS

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Calzedonia 10	Anthropologie 20	Debenhams 30	Falabella 40	Monprix 49	New Balance 60	ASOS 70	Gildan Activewear 80	Esprit 90	Gucci 100
Diesel 8	Urban Outfitters 20	Abercrombie & Fitch 29	Ralph Lauren 40	Kik 48	Lindex 59	Lululemon 70	Zalando 80	Puma 90	Bottega Veneta 98
Chanel 7	Michael Kors 20	Lacoste 29	Costco – Kirkland Signature 39	COACH 46	LOFT 59	Next 70	Levi Strauss & Co 77	Bershka 88	YSL 98
ANTA Sports 6	Sports Direct 18	Monsoon Accessorize 29	American Eagle 36	Champion 44	Louis Vuitton 59	OVS 69	G-Star 75	Massimo Dutti 88	Adidas 97
Dolce & Gabbana 6	Aéropostale 16	Ross Stores 29	J.Crew 36	Hanes 44	Nordstrom 59	Uniqlo 68	Topshop 73	Pull & Bear 88	Reebok 97
LL Bean 6	Dillards 16	Russell Athletic 28	Under Armour 36	Dressman 44	John Lewis 58	Walmart 68	Target 72	Stradivarius 88	Marks & Spencer 93
New York & Co. 6	Kohl's 16	Chico's 27	JC Penney 36	TJ Maxx 42	Salvatore Ferragamo 58	George at ASDA 67		Zara 88	H&M 92
Claire's Accessories 5	Carolina Herrera 15	Joe Fresh 27	Amazon 35	Primark 57	Tesco – F&F 67			Banana Republic 86	Calvin Klein 91
Marc Jacobs 4	Tory Burch 15	Triumph 27	Columbia Sportswear Co 33	Hudson's Bay 41	Lands' End 66			Gap 86	Tommy Hilfiger 91
Brooks Brothers 3	Matalan 14	Valentino 27	Armani 32	Sak's Fifth Avenue 41	Miu Miu 56	New Look 66		Old Navy 86	Van Heusen 91
New Yorker 3	Versace 14	Burlington 26	El Corte Inglés 32		Prada 56	Asics Corporation 63		Tchibo 86	
Max Mara 2	Youngor 14	JD Sports 26	The Buckle 32		Decathlon 54	bonprix 63		The North Face 84	
Barney's New York 1	Ermenegildo Zenga 13	Takko 26	Kate Spade 31		Jack & Jones 54	Fendi 63		Timberland 84	
Desigual 0		Dick's Sporting Goods 25	Lidl UK 31		Vero Moda 54			Vans 84	
Dior 0		Express 21			Superdry 54			Wrangler 84	
Heilan Home 0		Foot Locker 21			Mango 53			C&A 83	
Jessica Simpson 0		Forever 21 21			Benetton 52			Hugo Boss 83	
Liverpool 0		Neiman Marcus 21			Bloomingdale's 52			Converse 83	
Longchamp 0		Sainsburys – Tu Clothing 21			Macy's 52			Jordan 83	
Mexx 0					Victoria's Secret 52			Nike 83	
Nine West 0					Cortefiel 51			Burberry 82	
s. Oliver 0					GUESS? 51				
Sandro 0									

# 1. POLICY & COMMITMENTS

## FINDINGS

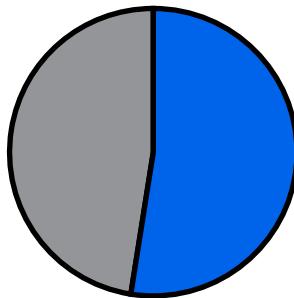
### HOW MANY BRANDS PUBLISH POLICIES?\*



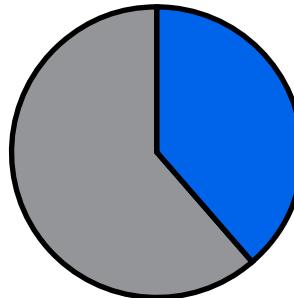
# 1. POLICY & COMMITMENTS

## FINDINGS

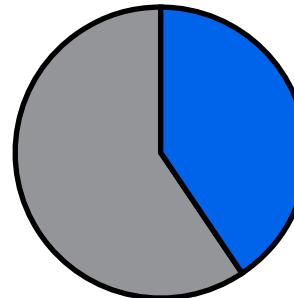
### SNAPSHOT OF FINDINGS



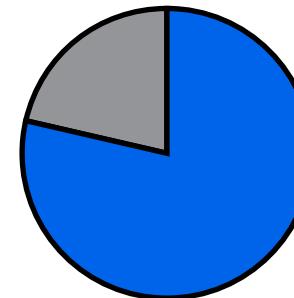
53% of brands publish an Animal Welfare policy



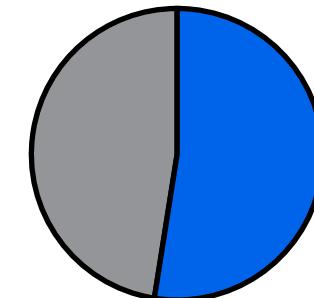
39% of brands publish an Equal Pay policy that applies to direct employees



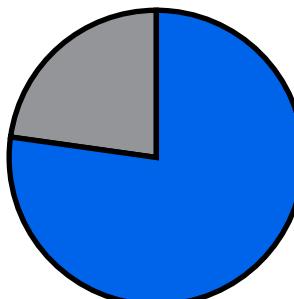
41% of brands publish an Equal Pay policy that applies to supply chain workers



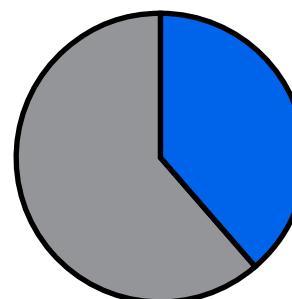
79% of brands publish a policy on Forced or Bonded Labour in the supply chain



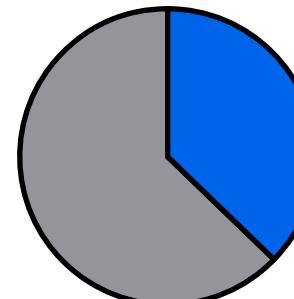
53% of brands disclose how their Forced or Bonded Labour policy is put into practice



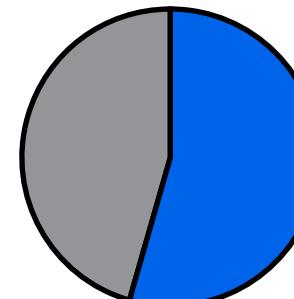
77% of brands publish a Child Labour policy



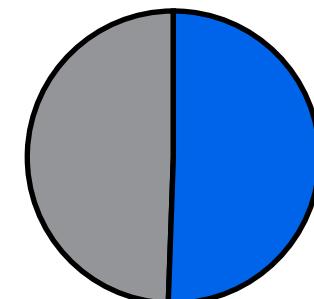
39% of brands disclose how their Child Labour policy is put into practice



37% of brands publish measurable, long-term commitments or goals on improving human rights



55% of brands publish measurable, long-term commitments or goals on improving environmental impacts



51% of brands disclose annual, up-to-date disclosure of progress towards achieving those goals

# 1. POLICY & COMMITMENTS

## IMPLICATIONS

### **Brands and retailers publish the most information about their policies and commitments but much less on performance and impacts**

Over half (53%) of the brands and retailers publish an animal welfare policy but only 35% disclose a policy on protecting biodiversity. 41% publish a Restricted Substances List showing which harmful chemicals are banned from their products. 72% publish information about their programmes and activities to tackle energy consumption and carbon emissions, an issue upon which brands and retailers appear to be fairly active. Over three-quarters (76%) of the brands and retailers publish a policy on discrimination within the company. But only 39% publish a policy on equal pay between men and women employed by the brand, i.e. those who work at their head office location, in retail stores and in other workplaces directly controlled by the company.

### **Brands widely publish policies on human rights**

Just over three-quarters of brands and retailers disclose policies on child labour (77%), forced labour (79%), discrimination (79%), harassment and abuse (77%) and health and safety (79%) in the supply chain – issues that arguably represent some of the most egregious violations of human rights.

### **Clear policies on Freedom of Association but fewer procedures published**

73% of brands and retailers publish a policy on freedom of association, the right to organise and collective bargaining for supply chain workers – a fundamental basic human right guaranteed by [articles 20 and 23 of the Universal Declaration of Human Rights](#), the [United States Bill of Rights](#), [article 11 of the European Convention on Human Rights](#) and by many other modern and democratic legal systems. But only 39% of brands and retailers disclose their procedures for ensuring that their Freedom of Association policies are put into practice.

71% of brands and retailers disclose policies on wages for workers in the supply chain, and 56% publish a specific policy on overtime pay. The [Garment Worker Diaries](#) research showed that workers participating in the study in Bangladesh regularly work more than 60 hours per week (see page 56 for more info.) Less than half (48%) of the brands and retailers disclose procedures, beyond auditing for compliance, that ensure their policies on wages and benefits are being implemented.

Less than one-third of brands and retailers (29%) publish a policy on foreign and migrant workers in the supply chain – a salient issue that was brought to light by a [2016 BBC television programme](#) investigation that found Syrian refugee children working in garment factories in Turkey supplying several high street brands. For some of the brands implicated in this situation, it was a matter of unauthorised subcontracting. Despite unauthorised subcontracting being such a challenging issue for brands and retailers to tackle, only 58% publish a policy on subcontracting, outsourcing and/or homeworkers in the supply chain. However, several brands have extensive detailed policies on foreign and migrant workers, such as ASOS, Levi Strauss & Co., Topshop and others.

### **Detailed environmental policies not often part of Supplier Codes of Conduct**

We were surprised to learn that many brands and retailers do not publish specific environmental policies for their suppliers. Less than half of the brands and retailers (49%) disclose policies aimed at suppliers on carbon emissions and energy reduction. Only 45% of brands and retailers publish policies on water effluents and treatment, and only 31% publish policies on water consumption at supplier facilities. Just 23% of the brands and retailers publish a policy on textile waste and recycling in their supplier guidelines.

### **Roughly half of brands publish social and environmental goals**

Over half of the brands and retailers (55%) publish measurable, time-bound goals on improving environmental impacts across their value chain but only 37% publish goals on improving human rights. Roughly half (51%) are reporting on the progress they're making towards achieving these goals, although reporting often covers only environmental aspects.

### **Low level of independent verification of social and environmental reporting**

33% of the brands and retailers are publishing an annual sustainability or corporate responsibility report in which the non-financial information is audited or verified by an independent third party. This has typically been done by big accounting firms such as Deloitte, Ernst & Young, KMPG and PricewaterhouseCoopers (PwC). Third party verification is required by law in France, so many of the brands receiving these points will be French-based companies. Overall brands and retailers are still publishing more information about their policy and commitments than they are about how they govern sustainability issues, who their suppliers are, how they are assessing their suppliers and the results of these assessments. This was the case in last year's report, and we will see that another year on, this trend has not changed.

## 2. GOVERNANCE APPROACH

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

In this section, we were looking for the name and role of the person with lead responsibility in the company for social and environmental performance. We also scored the brands and retailers on whether they published the direct contact details for this person, or at least contact details for a relevant department such as the sustainability/CSR team.

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

### Employee and Supplier incentives

Finally, we looked to see if brands are disclosing how their employees beyond the sustainability/CSR team (designers, buyers, sourcing managers, etc.) are incentivised (through performance targets or bonuses) to achieve improvements in social and environmental impacts. We also looked for the same sort of incentives (such as long-term sourcing commitments) tied to suppliers' social and environmental improvements.

**"Now, in the hyper-connected and ever evolving world, transparency is the new power."**

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BENJAMIN HERZBERG  
PRIVATE SECTOR ENGAGEMENT  
FOR GOOD GOVERNANCE,  
WORLD BANK INSTITUTE

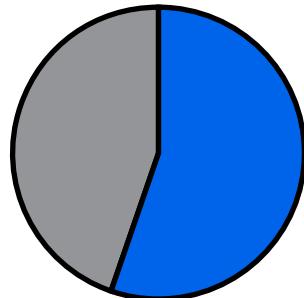
## 2. GOVERNANCE

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%												
Abercrombie & Fitch	0	ANTA Sports	15	American Eagle	23	Joe Fresh	38	Asics Corporation	46	Benetton	54	ASOS	69	Burberry	77	Adidas	85	C&A	100		
Aéropostale	0	Armani	15	Chico's	23	Mango	38	Banana Republic	46	Columbia Sportswear Co	54	G-Star	69	Dressman	77	Reebok	85	Esprit	100		
Amazon	0	Calzedonia	15	Debenhams	23	Bloomingdale's	31	Gap	46	Dillards	54	Lindex	69	Falabella	77	Lululemon	85	Marks & Spencer	100		
Anthropologie	0	Carolina Herrera	15	Monsoon Accessorize	23	Macy's	31	Old Navy	46	Tchibo	69	H&M	77	Bershka	62	Hugo Boss	77	Bottega Veneta	92		
Urban Outfitters	0	Chanel	15	New Balance	23	Champion	31	Burlington	46	Massimo Dutti	62	Zalando	77	Pull & Bear	62	Gucci	92	YSL	92		
Barney's New York	0	Costco – Kirkland Signature	15	New Look	23	Hanes	31	George at ASDA	46	Stradivarius	62	Zara	62	Sak's Fifth Avenue	46	JD Sports	46	Puma	92		
Brooks Brothers	0	Russell Athletic	23	Cortefiel	31	GUESS?	46	Hudson's Bay	46	bonprix	62	Calvin Klein	62	Decathlon	31	Converse	46	The North Face	92		
Claire's Accessories	0	Dick's Sporting Goods	15	Fendi	31	Sak's Fifth Avenue	46	Jordan	46	Tommy Hilfiger	62	Van Heusen	62	Lidl UK	31	Nike	46	Timberland	92		
Desigual	0	El Corte Inglés	15	Louis Vuitton	31	JD Sports	46	Miu Miu	46	COACH	62	Kik	46	LOFT	31	Prada	46	Vans	92		
Diesel	0	Hermès	15	JCPenney	31	Converse	46	Superdry	46	Gilden Activewear	62	Levi Strauss & Co	62	Matalan	31	Target	46	Wrangler	92		
Dior	0	Jack & Jones	15	John Lewis	31	Jordan	46	Next	62	Levi Strauss & Co	62	OVS	62	Monoprix	15	Uniqlo	31	TJ Maxx	46	Longchamp	0
Dolce & Gabbana	0	Vero Moda	15	Lidl UK	31	Nike	46	Primark	62	Tesco – F&F	62	Topshop	62	Nordstrom	15	Valentino	31	TJ Maxx	46	Marc Jacobs	0
Ermengildo Zegna	0	J.Crew	15	LOFT	31	Kik	46	Victoria's Secret	62	Victoria's Secret	62	Walmart	62	Ross Stores	15	Uniqlo	31	TJ Maxx	46	Max Mara	0
Express	0	Kohl's	15	Matalan	31	Miu Miu	46	Walmart	62					Sainsburys – Tu Clothing	31	Valentino	31	TJ Maxx	46	Mexx	0
Foot Locker	0	Lands' End	15	Ralph Lauren	31	Prada	46							Salvatore Ferragamo	31					Michael Kors	0
Forever 21	0	Monoprix	15	Sainsburys – Tu Clothing	31	Superdry	46							Target	46					Neiman Marcus	0
Heilan Home	0	Nordstrom	15	Salvatore Ferragamo	31	TJ Maxx	46												New York & Co.	0	
Jessica Simpson	0	Ross Stores	15	Valentino	31														New Yorker	0	
Kate Spade	0	Sports Direct	15																Nine West	0	
Lacoste	0	The Buckle	15																s. Oliver	0	
Liverpool	0	Under Armour	15																Sandro	0	
LL Bean	0	Versace	15																Takko	0	
Longchamp	0																		Tory Burch	0	
Marc Jacobs	0																		Triumph	0	
Max Mara	0																		Youngor	0	
Mexx	0																				

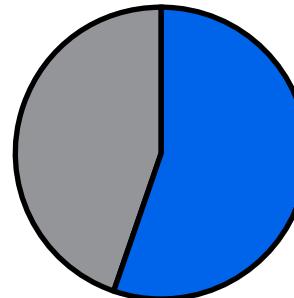
\* Brands ranked in numerical order by score out of 250, but shown as the nearest full percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

## 2. GOVERNANCE FINDINGS

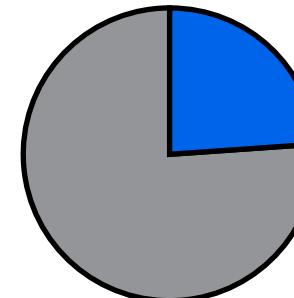
### CAN YOU GET IN TOUCH?



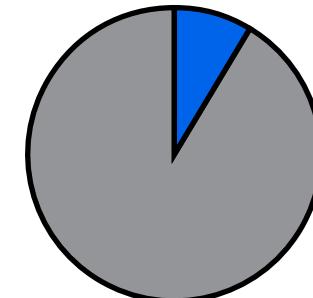
55% of brands publish contact details for sustainability/CSR department



55% of brands disclose name/role of individual with lead responsibility on their websites

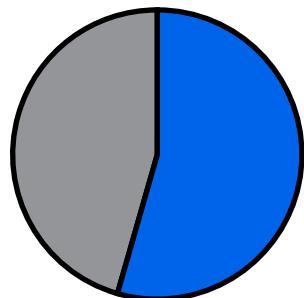


24% of brands disclose direct contact details for this person

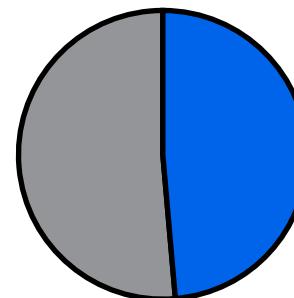


Only 9% of brands publish contact details on their published supplier list

### ACCOUNTABILITY

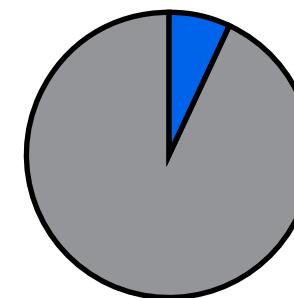


55% of brands publish board level responsibility

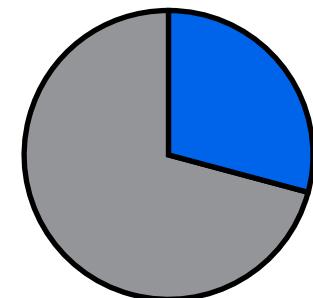


49% of brands describe how board accountability is implemented in practice

### PURCHASING PRACTICES



Only 12% of brands disclose incentives tied to improvements in human rights and environmental performance for staff beyond sustainability team



29% of brands disclose incentives tied to improvements in human rights and environmental performance for suppliers

## 2. GOVERNANCE IMPLICATIONS

### Getting in touch with brands and retailers

83 brands and retailers (55%) publish contact details – usually an email address – for the corporate responsibility or sustainability team, meaning anyone can get in touch with questions or comments about the company's practices. This should be a really basic thing for brands and retailers to do and shows that they're willing to hear anyone's concerns and feedback. 36 brands and retailers (24%) go a step further and publish the contact details of a specific person at the company who is responsible for environmental and human rights issues at the company.

### Holding individuals accountable

55% of brands and retailers disclose the name of a board member or a board committee that holds responsibility for the company's human rights and environmental issues. However, only 12% of the brands and retailers share publicly that their employees' incentives (i.e. bonuses, raises and other rewards for good performance) are tied to improvements in human rights and environmental impacts.

Overall when it comes to publishing information about corporate governance on sustainability and CSR issues, brands and retailers are disclosing roughly the same level of information as last year.

**"Transparency  
is not a choice.  
The only choice  
is, does it happen  
to you, or do you  
participate in it?."**

---

ALEX BOGUSKY

# 3. TRACEABILITY APPROACH

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

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

### For example, are brands sharing information such as:

- The address of the facility
- The types of products/services made in each supplier facility;
- Approximate number of workers;
- Gender breakdown of workers;
- % of migrant or contract workers;
- Date of last audit

## 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 substances such as fibres, hides, rubber, dyes, metals and so on?

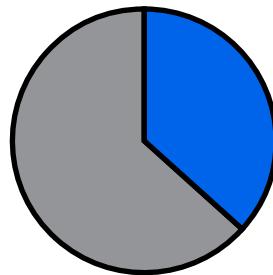
We gave extra points if supplier lists are made available in a searchable format, cover more than 95% of their suppliers and have been updated within the past 12 months.

### 3. TRACEABILITY

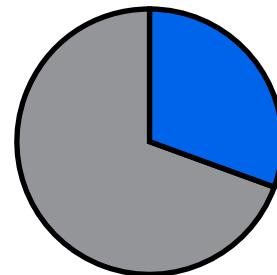
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Saks Fifth Avenue	9	Hanes	20	Marks & Spencer	27	The North Face	36	C&A	48
Russell Athletic	9	Primark	20	Lululemon	25	Timberland	36	Esprit	48
Abercrombie & Fitch	6	Target	19	Debenhams	24	Vans	36	Banana Republic	48
Joe Fresh	6	Jack & Jones	16	Hugo Boss	24	Wrangler	36	Gap	48
Bottega Veneta	1	Vero Moda	16	New Look	24	New Balance	35	Old Navy	48
Gucci	1	Dressman	15	Tchibo	24	Benetton	34	H&M	47
YSL	1	Bershka	13	Asics Corporation	22	Converse	32	Adidas	46
Burberry	1	Massimo Dutti	13	John Lewis	22	Jordan	32	Reebok	46
Chanel	1	Pull&Bear	13	Next	22	Nike	32	Levi Strauss & Co	46
COACH	1	Stradivarius	13	Under Armour	22			Puma	46
Fendi	1	Zara	13	bonprix	21				
Louis Vuitton	1	George at ASDA	13	Columbia Sportswear Co	21				
GUESS?	1	Uniqlo	13	LOFT	21				
Lands' End	1	Tesco	12						
Miu Miu	1	Calvin Klein	11						
Prada	1	Tommy Hilfiger	11						
OVS	1	Van Heusen	11						
Ralph Lauren	1	Gildan Activewear	11						
Salvatore Ferragamo	1	Lidl UK	11						
Superdry	1								
Topshop	1								
Aéropostale	0								
Amazon	0								
American Eagle	0								
ANTA Sports	0								
Anthropologie	0								
Urban Outfitters	0								
Armani	0								
Barney's New York	0								
Bloomingdale's	0								
Macy's	0								
Brooks Brothers	0								
Burlington	0								
Calzedonia	0								
Carolina Herrera	0								
Chico's	0								
Claire's Accessories	0								
Cortefiel	0								
Costco – Kirkland Signature	0								
Decathlon	0								
Desigual	0								
Dick's Sporting Goods	0								
Diesel	0								
Dillards	0								
Dior	0								
Dolce & Gabbana	0								
El Corte Inglés	0								
Ermengildo Zegna	0								
Express	0								
Falabella	0								
Foot Locker	0								
Forever 21	0								
Heilan Home	0								
JCPenney	0								
J.Crew	0								
JD Sports	0								
Jessica Simpson	0								
Kate Spade	0								
Kik	0								
Kohl's	0								
Lacoste	0								
Liverpool	0								
LL Bean	0								
Longchamp	0								
Mango	0								
Marc Jacobs	0								
Matalan	0								
Max Mara	0								
Mexx	0								
Michael Kors	0								
Monoprix	0								
Monsoon Accessorize	0								
Neiman Marcus	0								
New York & Co.	0								
New Yorker	0								
Nine West	0								
Nordstrom	0								
Ross Stores	0								
s.Oliver	0								
Sainsbury – Tu Clothing	0								
Sandro	0								
Sports Direct	0								
Takko	0								
The Buckle	0								
T.J. Maxx	0								
Tory Burch	0								
Triumph	0								
Valentino	0								
Versace	0								
Victoria's Secret	0								
Walmart	0								
Youngor	0								
Zalando	0								

# 3. TRACEABILITY FINDINGS

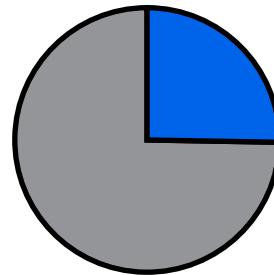
## WHO'S PUBLISHING TIER 1 SUPPLIER LISTS?



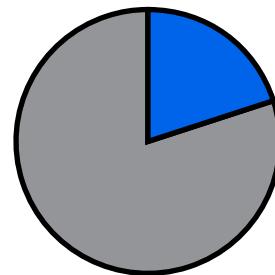
37% of brands are publishing supplier lists (which covers at least tier 1)



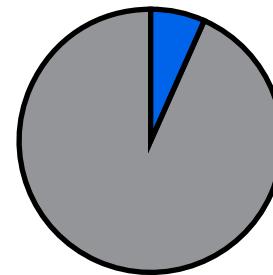
31% include the facility address



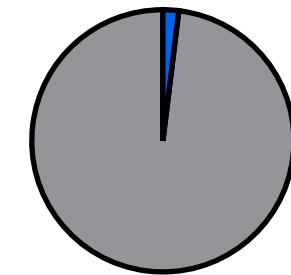
25% include the types of products made in the facility



20% include approximate number of workers in each facility

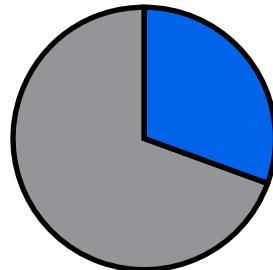


Only 7% include gender breakdown of workers in each facility

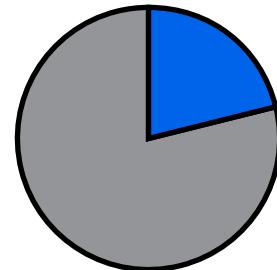


Only 2% include percentage of migrant workers in each facility

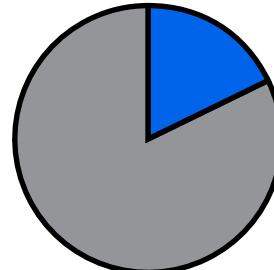
## WHO'S PUBLISHING BEYOND TIER 1?



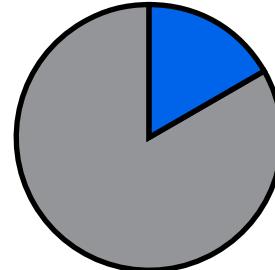
31% make this list available in a searchable format



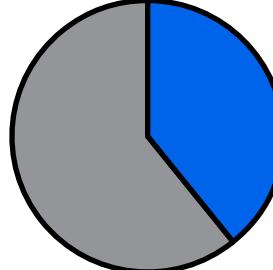
21% disclose that this list covers over 95% of their suppliers



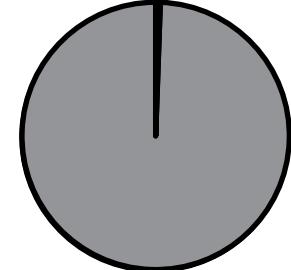
18% brands publish processing facilities



17% include the facility address



39% of brands are tracing at least one of their raw materials back to source



1 brand is publishing its suppliers of raw materials

# 3. TRACEABILITY IMPLICATIONS

This is where we have seen the greatest improvement in transparency since last year's report. 55 of the 150 brands are publishing a list of their Tier 1 factories – in other words, where their clothes are typically cut, sewn and completed. This means 37% of brands and retailers in this report are disclosing who their suppliers are, up from 32% last year in 2017 and 12.5% in 2016. This year, 32 of the 150 brands (21%) are publishing over 95% of their Tier 1 suppliers.

Just a quick note: Tier 1 lists sometimes include subcontractors of direct suppliers. Brands and retailers tend to define the different tiers of the supply chain differently. For this methodology, we are referring to the facilities involved in the final stages of production, the suppliers who typically have a direct contractual relationship with the brand or retailer.

## Several brands provide extra detail about their suppliers

46 brands and retailers (31%) who are publishing Tier 1 lists include a street address for each supplier; 38 brands

(25%) include what types of products or services each supplier provides; 30 brands (20%) include an approximate number of workers at each facility; 10 brands (7%) include the female-to-male ratio of workers.

46 brands and retailers (31%) publishing Tier 1 suppliers provide this information in searchable format, (i.e. table or spreadsheet) making it much more user-friendly for trade unions, journalists and NGOs. The rest of the publishing brands opt for formats such as interactive online maps or expandable drop-down menus on their website.

## Aligning with the Transparency Pledge

We have aligned the Fashion Transparency Index methodology with most of the requirements of the [Transparency Pledge](#), which is endorsed by a global civil society coalition and outlines a standard approach for the disclosure of a manufacturing lists by major apparel and footwear companies.

The Transparency Pledge requires that: 'The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English: The full name of all authorized production units and processing facilities; the site addresses; the parent company of the business at the site; type of products made' worker numbers at each site. Companies will publish the above information in a spreadsheet or other searchable format.' The only aspect we have not included in the Fashion Transparency Index is parent company information, which we will consider adding to the next edition. 72 major apparel and footwear companies were asked to published their lists by 31 December 2017. Just to note that the Transparency Pledge has contacted and tracked progress by company, whereas we are counting by individual brand or retailer name (who are sometimes owned by the same company, e.g. PVH owning Calvin Klein, Tommy Hilfiger and Van Heusen) – so their numbers might look different than ours.

## Transparency Pledge influences key brands to publish manufacturers in 2017

46% of the brands and retailers reviewed in the Fashion Transparency Index have been asked to sign the Transparency Pledge, 47 of the 150 brands which are in the Index and have been contacted by the Pledge are publishing a Tier 1 supplier list, although not all of them are completely aligned with the Pledge's full requirements. 22 brands which are in the Index and have been contacted by the Pledge are not yet publishing their suppliers. This is reflected in the Index's final scoring for section three. The brands and retailers who score highest in section three of the Fashion Transparency Index are those that tend to be most aligned with the requirements of the Transparency Pledge. Over the past year, the Transparency Pledge campaign has been incredibly effective in motivating brands and retailers to publish supplier lists in a searchable format and to provide granular detail about these suppliers.

## A handful of brands go above and beyond the others

A few brands and retailers are going above and beyond the requirements of the Transparency Pledge. Four brands include an email address or phone number for each Tier 1 supplier; these include Converse, Jordan, Nike (all owned by Nike, Inc.) and Lindex. Three brands – Converse, Jordan, Nike (all owned by Nike, Inc.) – include the percentage of foreign and migrant workers at each supplier. Although not covered within the scoring of our methodology, we thought it interesting to point out that Marks & Spencer is the only brand/retailer that includes whether each facility on its Tier 1 supplier list has a trade union or workers committee. We would like to see more brands and retailers providing this information and will consider adding it into next year's edition. Having quick access to data on unionisation and worker representation can be invaluable for trade unions that are striving to build strong unions, organise union registrations, increase membership and fight against precarious work.

## Going beyond Tier 1

27 brands and retailers (18% of the 150) are publishing a list of their processing facilities – where our garments and fabrics are woven, laundered, dyed, printed, embroidered, embellished or otherwise treated with special finishings

or coatings. In our 2017 Index, 14 brands were publishing this information, representing 14% of the brands and retailers reviewed last year, so we have seen an increase in brands publishing their suppliers further down the chain.

## Disclosing where raw materials come from

Only one brand is publishing where they source raw materials. 90% of the fibres produced for ASOS products come from major suppliers Lenzing and Aditya Birla with a very small amount sourced from Shangdong Yemi and Nanjing Chemicals. Last year no brands or retailers were disclosing the source of raw materials.

## For future consideration

How brands and retailers will go about disclosing their raw materials suppliers is ripe for further industry-wide discussions. There are debates emerging around the sensitivity of disclosing farms, which in smallholder farming situations may be someone's home as well as place of work.

**"Transparency may be the most disruptive and far-reaching innovation to come out of social media."**

---

PAUL GILLIN,  
TECHNOLOGY JOURNALIST

# 4. KNOW, SHOW & FIX APPROACH

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

We awarded points if brands disclosed:

- The decision-making process for taking on new suppliers;
- How frequently assessments are conducted (e.g. every 12 months);
- How many assessments are announced in advance versus semi-announced or unannounced factory visits;
- How many assessments are double-checked for accuracy;
- And whether assessments include worker representatives, unions or labour rights NGOs.

## Know

How do brands go about assessing suppliers to make sure they're meeting their policies? We looked for a description of brands' supplier assessment processes (typically factory audits).

## Show

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

## Fix

Finally, we looked at what brands are publishing about how they fix problems in factories when discovered through the assessment process. How do brands remediate issues, and what do they do with outstanding orders when problems are being addressed or are not fixed at all? Do brands have confidential whistleblowing procedures in place for both their own employees and for workers? Are brands disclosing the results of these efforts to fix problems found in factories (typically, these are called Corrective Action Plans)?

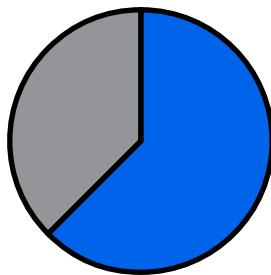
# 4. KNOW, SHOW & FIX

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Cortefiel	9	Costco – Kirkland Signature	20	Benetton	30	Calvin Klein	38	Puma	50
Ermengildo Zegna	9	Dick's Sporting Goods	20	George at ASDA	30	Tommy Hilfiger	38	Adidas	45
Lidl UK	9	JCPenney	20	Tesco – F&F	30	Van Heusen	38	Reebok	45
Aéropostale	8	Kate Spade	20	COACH	28	H&M	38	Esprit	43
Joe Fresh	8	Lands' End	20	Hudson's Bay	28	Primark	38	C&A	41
Marc Jacobs	8	Under Armour	20	Sak's Fifth Avenue	28	Bershka	38	Marks & Spencer	41
Valentino	8	bonprix	19	Burberry	27	Massimo Dutti	38		
Anthropologie	7	Debenhams	19	Gildan Activewear	27	Pull & Bear	38		
Urban Outfitters	7	Dressman	19	Uniqlo	27	Stadivarius	38		
Hermès	7	Salvatore Ferragamo	19	Hugo Boss	26	Zara	38		
Jack & Jones	7	Superdry	19	Russell Athletic	26	Target	36		
Vero Moda	7	Victoria's Secret	19	G-Star	24	Levi Strauss & Co	35		
Monoprix	7	American Eagle	18	Champion	24	The North Face	32		
Carolina Herrera	5	Columbia Sportswear Co	18	Hanes	24	Timberland	32		
Diesel	5	Dillards	18	Lindex	24	Vans	32		
Forever 21	5	Bloomingdale's	18	Lululemon	24	Wrangler	32		
LL Bean	5	Macy's	18	Walmart	24	Bottega Veneta	31		
Neiman Marcus	5	Chico's	16	LOFT	23	Gucci	31		
Armani	4	GUESS?	16	Abercrombie & Fitch	22	YSL	31		
Claire's Accessories	4	J.Crew	16	Next	22	Tchibo	31		
John Lewis	4	Converse	16	TJ Maxx	22				
Monsoon Accessorize	4	Jordan	16	Zalando	22				
New York & Co.	4	Nike	16	ASOS	20				
Foot Locker	3	New Look	16						
Sports Direct	3	Topshop	16						
Versace	3	Burlington	15						
Fendi	1	JD Sports	15						
Louis Vuitton	1	Mango	15						
Matalan	1	OVS	15						
Miu Miu	1	Ralph Lauren	15						
Prada	1	Decathlon	14						
Tory Burch	1	El Corte Inglés	14						
ANTA Sports	0	Kohl's	14						
Barney's New York	0	Nordstrom	14						
Brooks Brothers	0	The Buckle	14						
Chanel	0	Triumph	14						
Desigual	0	Amazon	12						
Dior	0	Asics Corporaion	12						
Dolce & Gabbana	0	Calzedonia	12						
Heilan Home	0	Kik	12						
Jessica Simpson	0	Michael Kors	12						
Lacoste	0	Ross Stores	12						
Liverpool	0	Takko	12						
Longchamp	0	Express	11						
Max Mara	0	Falabella	11						
Mexx	0	New Balance	11						
New Yorker	0								
Nine West	0								
s. Oliver	0								
Sainsburys – Tu Clothing	0								
Sandro	0								
Youngor	0								

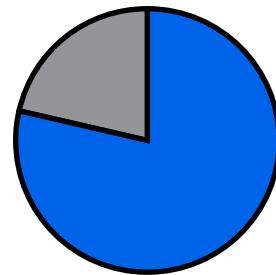
# 4. KNOW, SHOW & FIX

## FINDINGS

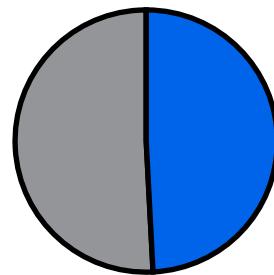
### SUPPLIER ASSESSMENTS



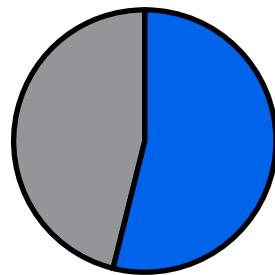
63% of brands disclose their criteria for taking on new suppliers



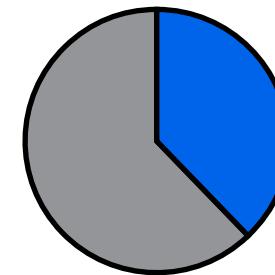
79% of brands disclose their process for assessing conditions in supplier facilities



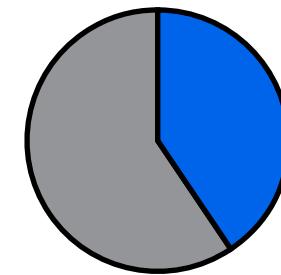
49% of brands disclose how frequently assessments are conducted



54% of brands disclose whether supplier assessments are announced vs. surprise visits

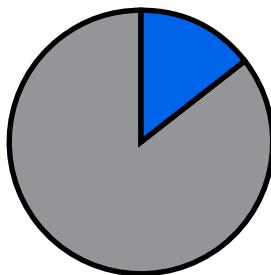


38% of brands describe assessments as including worker interviews or union involvement

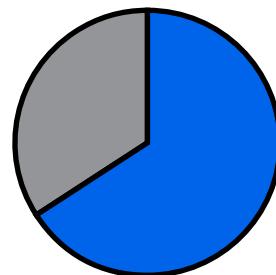


41% of brands publish summarised findings of their supplier assessments at tier 1

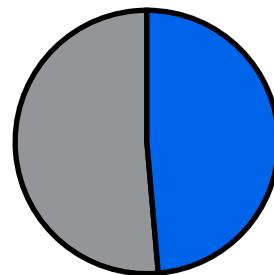
### ADDRESSING PROBLEMS



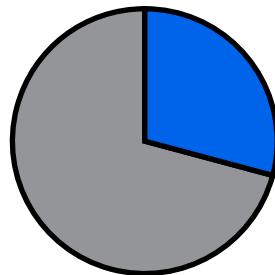
15% of brands publish summarised findings of their supplier assessments beyond tier 1



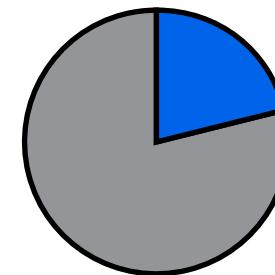
66% of brands publish a whistleblowing procedure for company employees



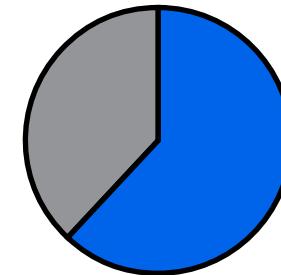
49% of brands publish a grievance mechanism process for supply chain workers



29% of brands include the grievance mechanism in the Supplier Code of Conduct



21% of brands disclose how supply chain workers are informed about this grievance mechanism



62% of brands disclose the process for remediation when violations are found in a supplier facility

# 4. KNOW, SHOW & FIX IMPLICATIONS

## **Know: Most brands describe how they assess suppliers' compliance with their policies**

Nearly 80% of the brands and retailers publish a description of their factory audit processes which is typically how they check to see if their suppliers are complying with the local law, international labour and environmental standards and/or their company policies (those reviewed in section one).

We have noticed that information about auditing procedures is often disclosed in the [UK Modern Slavery Act](#) or the [California Transparency in Supply Chains Act](#) statements, both of which require companies to provide the public with information regarding their efforts to eradicate slavery and human trafficking from their supply chains. Our impression is that these two laws have notably increased the number of brands and retailers disclosing information about their factory audit processes. 49% of brands disclose how regularly factory audits take place, often these happen at least annually. Only 38% of the brands and retailers disclose whether their factory audit processes include worker interviews or the involvement of trade unions or worker rights NGOs.

Factory audits are one tool for assessing and monitoring supplier's performance on social and environmental issues.

Many industry experts have come to agree that factory inspections are an important first step in making factories and workers safe, but they are not enough. The debate around the usefulness of factory audits centres around a variety of contentious issues such as double books, falsified records, coached worker interviews, corrupt, inadequate or profit-driven auditors, meaningless tick-box exercises and the list goes on. The discussion about audits amongst major industry players continues, but we don't have enough space here to dig into the issue further.

## **Show: Publishing supplier assessments can drive improvements**

When the results of factory audits are made publicly available, we have seen this drive improvements in safety standards and reduce non-compliances with critical labour-related issues – as has been the case with the [Bangladesh Accord on Building & Fire Safety](#), the [Alliance for Bangladesh Worker Safety](#) and the [Better Factories Cambodia Transparency Database](#) (BFC).

Better Factories Cambodia's Transparency Database now contains information for over 800 assessments covering 450 factories – representing 78.2% of the garment factories in Cambodia that possess licenses to export.

Since compliance data for specific factories has been shared publicly, BFC reports a 46% increase in the number of factories in compliance with critical issues. After information was disclosed publicly, compliance on critical issues improved by 2 to 17% across a range of different areas. This shows quite clearly that the disclosure of audit results can be an important driver of positive change, actually improving conditions in factories.

## **Show: Several brands publish summaries of supplier assessment results**

41% of the 150 brands and retailers are publishing an aggregated summary of their factory audit findings. 22% of the brands and retailers are disclosing audit results for specific named factories, and this is only because they're members of the Bangladesh Accord on Building & Fire Safety, the Alliance for Bangladesh Worker Safety or the Better Work/BFC programme (with a web link via the brand's website to these initiatives) and are also publishing their Tier 1 suppliers lists – making it possible to cross-reference the factories on each publicly available database. However, you would need to really dig to make sense of this information and we can't imagine many people taking the time and effort to do this.

## **Fix: Half of brands publish whistleblowing hotline for workers**

Roughly half of the brands and retailers (49%) disclose a whistleblowing hotline or grievance mechanism for workers in the supply chain but only 29% include this grievance mechanism in their supplier codes of conduct. A grievance mechanism is a formal, complaint process that can be used by individuals, workers, communities and/or civil society organisations that are being negatively affected by certain business activities and operations. Grievance mechanisms are not much use if workers don't know they exist.

The [UN Guiding Principles on Business and Human Rights](#) (UNGPs) states that: "To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted." The UNGPs spell out that workers should be able to engage the company "directly in assessing the issues and seeking any remediation of harm." We are surprised to see that more brands and retailers are not publishing a grievance mechanism that is available to workers in their supply chain considering the importance the UNGPs places on this.

# 5. SPOTLIGHT ISSUES: WOMEN. WORKERS. WASTE *APPROACH*

Each year, we focus on different “Spotlight Issues”, and this year our team has chosen to focus on three issues in deeper detail.

We have chosen these particular “Spotlight Issues” as they align with our forthcoming work on the [UN Sustainable Development Goals \(SDGs\)](#).

## **Women**

How brands and retailers are tackling gender-based discrimination and violence in supply chains, supporting gender equality and promoting female empowerment in its own company and in the supply chain.

## **Workers**

How brands and retailers are supporting the payment of living wages to their employees and workers in the supply chain and how they're ensuring that supply chain workers are able to unionise and collectively bargain.

## **Waste**

What brands and retailers are doing to tackle textile and clothing waste and recycling and what they're doing to move towards a circular economy.

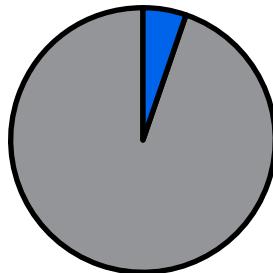
## 5. SPOTLIGHT ISSUES

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
American Eagle	10	Banana Republic	20	C&A	30	Tchibo	40	Adidas	50
bonprix	10	Gap	20	Puma	30	Burberry	37	Reebok	50
Decathlon	10	Old Navy	20	Bottega Veneta	27	Primark	33	H&M	50
Dressman	10	Hermès	20	Gucci	27	Topshop	33	ASOS	47
Falabella	10	Converse	20	YSL	27			Marks & Spencer	60
Jack & Jones	10	Jordan	20	G-Star	27			Bershka	53
Vero Moda	10	Nike	20	Levi Strauss & Co	27			Massimo Dutti	53
Mango	10	Calvin Klein	20	Esprit	23			Pull & Bear	53
Monsoon Accessorize	10	Tommy Hilfiger	20	Gildan Activewear	23			Stradivarius	53
New Balance	10	Van Heusen	20	New Look	23			Zara	53
Nordstrom	10	Debenhams	17	The North Face	23				
Salvatore Ferragamo	10	George at ASDA	17	Timberland	23				
Target	10	Hugo Boss	17	Vans	23				
Zalando	10	John Lewis	17	Wrangler	23				
Asics Corporation	7	Lindex	17						
Bloomingdale's	7	Lululemon	17						
Macy's	7	Next	17						
Columbia Sportswear Co	7	Tesco - F&F	17						
Cortefiel	7	Benetton	13						
Costco - Kirkland Signature	7	El Corte Inglés	13						
Fendi	7	GUESS?	13						
Louis Vuitton	7	LOFT	13						
J.Crew	7	OVS	13						
JD Sports	7	Sainsburys - Tu Clothing	13						
Kik	7	Superdry	13						
Lands' End	7	Uniqlo	13						
Lidl UK	7	Walmart	13						
Monoprix	7								
Miu Miu	7								
Prada	7								
TJ Maxx	7								
Abercrombie & Fitch	3								
ANTA Sports	3								
Chanel	3								
COACH	3								
Diesel	3								
Forever 21	3								
Kohl's	3								
Lacoste	3								
Longchamp	3								
Ross Stores	3								
Sports Direct	3								
Takko	3								
Under Armour	3								
Victoria's Secret	3								
Aéropostale	0								
Amazon	0								
Anthropologie	0								
Urban Outfitters	0								
Armani	0								
Barney's New York	0								
Brooks Brothers	0								
Burlington	0								
Calzedonia	0								
Carolina Herrera	0								
Champion	0								
Hanes	0								
Chico's	0								
Claire's Accessories	0								
Desigual	0								
Dick's Sporting Goods	0								
Dillards	0								
Dior	0								
Dolce & Gabbana	0								
Ermengildo Zegna	0								
Express	0								
Foot Locker	0								
Heilan Home	0								
Hudson's Bay	0								
Sak's Fifth Avenue	0								
JCPenney	0								
Jessica Simpson	0								
Joe Fresh	0								
Kate Spade	0								
Liverpool	0								
LL Bean	0								
Marc Jacobs	0								
Matalan	0								
Max Mara	0								
Mexx	0								
Michael Kors	0								
Neiman Marcus	0								
New York & Co.	0								
New Yorker	0								
Nine West	0								
Ralph Lauren	0								
Russell Athletic	0								
s. Oliver	0								
Sandro	0								
The Buckle	0								
Tory Burch	0								
Triumph	0								
Valentino	0								
Versace	0								
Youngor	0								

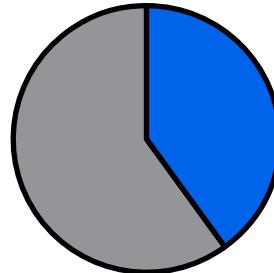
# 5. SPOTLIGHT ISSUES

## FINDINGS

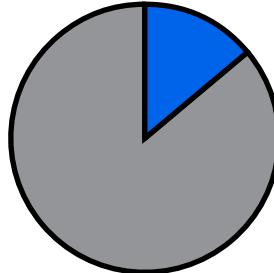
### WOMEN



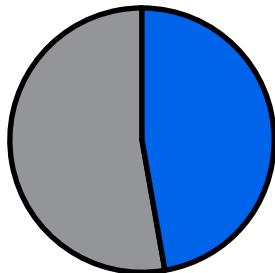
Only 5% of brands publish data on the prevalence of gender-based labour violations in their supply chains



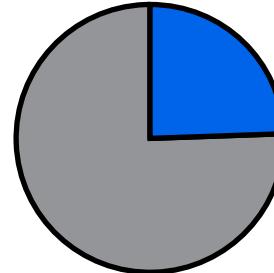
40% of brands describe capacity building projects focused on female empowerment of supply chain workers



Only 14% of brands publish the annual gender pay gap within the company

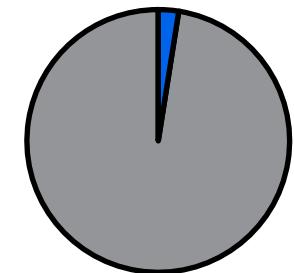


47% of brands disclose the annual percentage of women in executive and management positions in the company



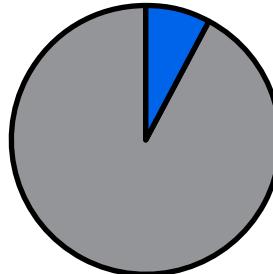
Only 25% of brands publish a strategy, including quantitative goals, on female empowerment

### WORKERS

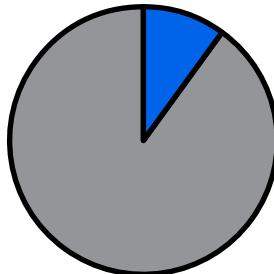


Only 3% of brands disclose the number of suppliers that have independent, democratically elected unions

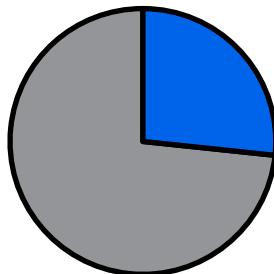
### WASTE



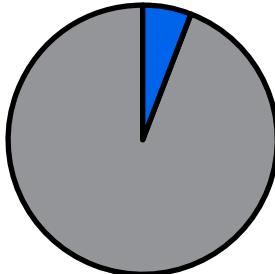
Only 8% of brands disclose the number supply chain workers that are covered by collective bargaining agreements



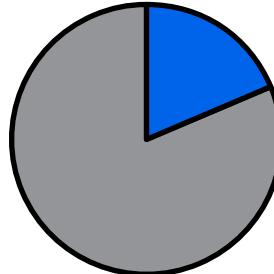
Only 10% of brands describe how their purchasing practices enable payment of a living wage to supply chain workers



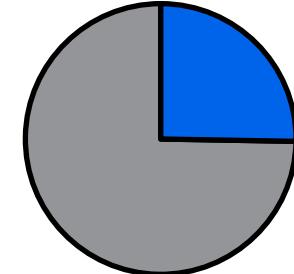
27% of brands offer clothing take-back schemes or in-store product recycling



Only 6% of brands advertise repair services in order to help extend the life of products



Only 18% of brands describe what they do with unwanted production samples, unsold and defective stock



25% of brands report investments in circular resources or technologies that help reduce resource consumption

# 5. SPOTLIGHT ISSUES

## IMPLICATIONS

### **Women (SDG5)**

40% of brands and retailers report on capacity building projects in the supply chain that are focused on gender equality or female empowerment. One example that many brands and retailers are supporting is BSR's [HERproject](#), which "drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality." Another example is CARE International's [P.A.C.E. project](#) in Bangladesh, supported by Gap, which provided skills-based training to urban migrant women workers.

19 brands (13%) publish detailed supplier guidance on issues facing female workers in the supply chain in their Supplier Codes of Conduct while only 8 brands (5%) disclose any data on the prevalence of gender-based labour violations in supplier facilities – e.g. sexual harassment and other forms of gender-based violence; treatment and firing of pregnant workers; maternity leave/pay; bathroom breaks during periods; women in supervisor/middle management roles; gender pay gap; women on Worker Participation Committees and in unions, etc.

The [Women's Empowerment Principles](#) – an initiative by the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and the United Nations Global Compact – launched in 2010 and set out seven steps that business and other sectors can take to advance and empower women. Companies that have signed up to the WEPs explicitly state their intention to measure and publicly report on their progress towards gender equality in their workplace, marketplace and community. In our review, we have found that only a quarter of the brands and retailers (37 brands in total) report signing up to the WEPs or the company's overall strategy and quantitative goals to advance women's empowerment.

Less than half (47%) of brands and retailers disclose the percentage of women in executive and management positions within the company, and only 14% of the brands and retailers publish the annual gender pay gap within the company. Those that are publishing the gender pay gap tend to be British companies, which, as of 4 April 2018, are required to do so by law.

### **Workers — Living Wages (SDG8)**

[ACT](#) (Action, Collaboration, Transformation) is a ground-breaking agreement between global brands and retailers and trade unions to transform the garment and textile industry and achieve living wages for workers through industry-wide collective bargaining linked to brands' purchasing practices. 14 of the brands and retailers (across 10 parent companies) disclose membership of ACT and link to the ACT website from their own website or annual report. Four more brands and retailers have otherwise made time-bound commitments towards setting up wage systems and achieving living wages for workers.

Beyond this very few brands are disclosing efforts towards enabling the payment of living wages to workers in the supply chain. Less than 3% of brands publish a policy of paying their suppliers on time, an issue we have been told continually frustrates suppliers. We hope that through initiatives like ACT the industry will see faster progress towards achieving living wages.

### **Workers — Unionisation & Collective Bargaining (SDG8)**

Very few – less than 3% – of brands and retailers are reporting on the number or percentage of their suppliers that have independent, democratically elected unions. 12 brands (8%) disclose the number or percentage of supply chain workers that are covered by collective bargaining agreements.

Collective bargaining means negotiating on the terms and conditions of employment between workers and their employers and is essential to ensuring improved wages, better working conditions and sustainable livelihoods.

We would like to highlight that ASOS, H&M, Inditex (who owns Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara) and Tchibo have signed global framework agreements (GFAs) with [IndustriALL Global Union](#), covering millions of garment workers. According to IndustriALL, GFAs "protect the interests of workers employed in all operations of the multinational companies who sign them. GFAs are negotiated at the global level between trade unions and companies. They establish the best possible standards on trade union rights, on health and safety, and on the labour relations principles adhered to by the company in its global operations, regardless of the standards existing in a particular country."

# 5. SPOTLIGHT ISSUES

## *IMPLICATIONS*

**Topshop** continues to be the only brand that requires its suppliers to sign a 'Right to Organise Guarantee' which is intended to ensure that workers' Freedom of Association rights are clearly communicated and understood by all workers.

This is disappointing. We would like to see more transparency from brands and retailers on their efforts to support freedom of association and put systems into place to enable collective bargaining.

### **Waste – [SDG12]**

Over a quarter of brands and retailers (27% or 40 brands in total) are offering clothing take-back schemes or in-store clothing recycling in order to help consumers recycle unwanted clothes instead of sending them to landfill.

Less than 20% of brands and retailers disclose what happens to pre-consumer surplus and waste materials (e.g. excess and defective product runs, textile offcuts, surplus and dead stock materials) and post-production surplus and waste clothing and materials (e.g. production samples, unsold clothing and defective stock). Only nine brands (6%) advertise repair services in order to help extend the life of their products.

However, in more positive news, a quarter of the brands and retailers are disclosing investments in circular, closed-loop resources and technologies with the aim to reduce resource consumption and increase resource efficiency – up from 14% last year.



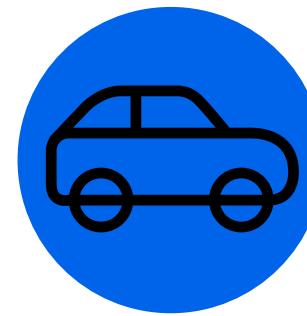
It can take 2,700 litres to produce the cotton needed to make a single t-shirt.

[source: [WWF](#)]



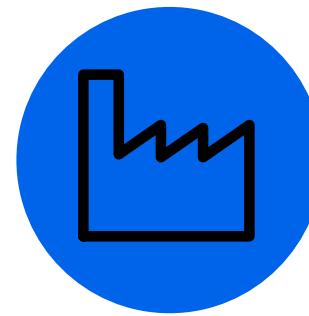
95% of the clothes North Americans throw away into landfills each year could be reused or recycled

[source: [Value Village](#)]



The carbon emissions generated by the clothing of the average household in the UK is equivalent to driving 6,000 miles in a car

[source: [WRAP](#)]



It is estimated that 150 billion items of clothing are delivered out of factories annually worldwide – that's 20 new items of clothing for every person on the planet

[source: [Materials Systems Laboratory, MIT](#)]

# VIEWPOINT:

## *HOW TRANSPARENCY CAN HELP IMPROVE WORKING CONDITIONS FOR WOMEN*



JOE SUTCLIFFE  
ADVISOR –  
DIGNIFIED WORK,  
CARE INTERNATIONAL UK

*Garment brands and retailers are slowly gaining more visibility on the lower tiers of their supply chains and are becoming more transparent about where they source their clothes from and the working conditions experienced by workers.*

For [CARE](#), brand disclosure of their supplier lists means we can identify the multiple brands who source from the factories we work in, inform brands of the work we are doing and promote further action to improve working conditions. In future, we can also use this data to report and promote action to address human rights abuses when they are found.

Progress has been made, but many of the jobs that women do in the lower tiers of the garment supply chain and the human rights abuses they face remain invisible. Many women work in unregulated factories or in their own homes and are not legally recognised as workers. As a result, they are not protected by the labour law, cannot access social protections and are invisible to brands and the consumers who wear the clothes they make.

The human rights abuses women workers face are also gendered, including a significant gender pay gap, violence and harassment, segregation in the types of jobs that women and men do and poor opportunities for promotion, and poor job security and treatment of pregnant workers. These issues are rarely captured in compliance audits and many are under-reported, if at all, by women workers, so the prevalence and impact they have on women is not recognised, understood or addressed.

**“We plan to use publicly available compliance data to support workers and unions to hold employers and brands accountable through evidence-based advocacy and bargaining.”**

CARE has identified two key ways that transparency can improve working conditions for women working in the garment industry:

**1) Transparency of the full supply chain could increase visibility of women working in the lower tiers, including in unauthorised subcontracting sites and in their own homes, where working conditions are poor.** This would benefit women workers by increasing visibility of the contribution they make to the supply chain and promoting their legal recognition as workers; and enabling trade unions, civil society and informal worker associations to hold brands and suppliers accountable for working conditions in the lower tiers. Full supply chain transparency would also benefit brands by increasing visibility of the salient human rights risks faced by workers, supporting more systematic action to improve working conditions.

**2) Transparency could increase visibility, understanding, reporting and action on the injustices facing women in the supply chain.** CARE's research has demonstrated that nearly 1 in 3 women working in the garment industry in Cambodia experienced sexual harassment in a 12-month period. Visibility of the issue has made it easier for all stakeholders to see that sexual harassment is a problem and to start taking steps to address it. Brands and consumers in the global north need only look at #MeToo to see how public reporting on gender-based violence can support other survivors to report, hold perpetrators and complacent institutions accountable and drive wider change to prevent violence against women. Improved reporting on gender-based violence in the garment industry, including monitoring and public reporting by brands, would play a significant role in catalysing action across the industry.



## VIEWPOINT: GARMENT WORKER DIARIES SHOW THE NEED FOR A MULTI-SECTORAL APPROACH TO TRANSPARENCY



GUY STUART  
EXECUTIVE DIRECTOR  
MICROFINANCE OPPORTUNITIES

*Sumi is a garment worker who lives in the Savar Upazila, about 24 kilometres northwest of Dhaka City. The factory she works in operates under the auspices of both the Accord on Fire and Building Safety in Bangladesh and the Alliance for Bangladesh Worker Safety.*

Sumi was a participant in the [Garment Workers Diaries](#) study, which collected data from 540 garment workers in Bangladesh, Cambodia, and India for a year from July 2016 to August 2017. During that year Sumi was at work, on average, 59 hours per week. In half the weeks covered by the study Sumi was at work more than the legal maximum of 60 hours per week. Bangladesh labor law requires workers to be paid double their regular pay for overtime. Taking this into account, in at least half the pay periods covered by the study Sumi earned less than the minimum wage. On average Sumi earned 35 taka per hour, €0.35 per hour, which, taking into account the cheaper cost of living in Bangladesh, is worth just over €1 per hour in Europe or \$1.20 per hour in the U.S. As a result, Sumi was mired in debt and reported low food security. As she put it when we talked with her: "If I could buy 5 to 7 kgs of fish, I could eat properly throughout the month. But most often, I can't do that."

Sumi's story is typical of the 180 Bangladeshi women who participated in the Garment Worker Diaries. It reveals the need for a multi-faceted, cross-sectoral approach to supply-chain transparency, because what is apparent in Sumi's story is the result of a number of different organisations that are failing her. These include the government of Bangladesh, which is failing to enforce its own working hours and wage laws as well as honouring its commitments to protect workers' rights to freedom of association and collective bargaining; and the factory owners who are willing to violate their country's laws to gain business; and the brands that continue to source from these factories.

**"Transparency is necessary to determine the extent to which workers' basic rights are being respected, whether suppliers are complying with their own countries' laws, and whether workers' wages are sufficient."**

In sum, transparency is necessary to determine the extent to which workers' basic rights are being respected, whether suppliers are complying with their own countries' laws, and whether workers' wages are sufficient. Governments, consumers, brands, factories, unions, and workers themselves all have a role in this. But it is only one part of the equation. These same stakeholders have to act in response to what they learn through transparency.

# VIEWPOINT



**DR. MARK ANNER**  
DIRECTOR,  
CENTER FOR GLOBAL WORKERS' RIGHTS  
PENN STATE UNIVERSITY

*The Fashion Transparency Index is a crucial contribution to addressing sweatshop practices because it shines a spotlight on where progress has been made and what remains to be done.*

Each year, the Index adds new and important transparency measures and monitors more companies. The finding that only 39% of brands and retailers disclose their procedures for ensuring that Freedom of Association policies are put into practice suggests that this most fundamental right to voice at work does not enjoy the protection it requires.

Only one company indicates in its supplier lists whether workers have union representation, and none list which suppliers have collective bargaining agreements. This should be a requirement for all companies.

Research has consistently shown that when workers are organised in democratic unions that are independent of government and employers and empowered to bargain collectively are often the most effective way to address a range of issues and violations that have plagued the industry, including forced and excessive overtime, unsafe buildings, low wages.

**“The time has come to establish transparent sourcing practices and incentive systems that are conducive to the human development and empowerment of the workers who work so hard every day to make the clothes we wear.”**

In far too many apparel-exporting countries, workers are often dismissed or threatened when trying to organise unions, achieve living wages, or establish more stable work schedules. Many problems are the result of employer abuses and weak local governance.

Yet, significant problems are the result of sourcing practices that start at the top of global supply chains. This includes a worrisome pattern of reducing the price paid to produce apparel and shortening the time allotted to make and ship items. The price squeeze contributes to low wages and unsafe buildings. And the lead-time squeeze engenders forced overtime and increased worker production quotas.

Changing such practices requires changing company incentives. When examining what incentives, if any, brands provide their sourcing departments to ensure compliance with social and environmental standards, Fashion Revolution found only 12% of companies share their policies.

As Fashion Revolution's research indicates, the time has come to establish transparent sourcing practices and incentive systems that are conducive to the human development and empowerment of the workers who work so hard every day to make the clothes we wear.

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# WHAT SHOULD YOU DO WITH THIS INFORMATION?



# CITIZENS

We hope the Fashion Transparency Index inspires people to ask brands **#whomademyclothes** demanding greater transparency.

At the moment none of us have enough information about where and how our clothes are made. We have the right to know that our money is not supporting exploitation, human rights abuses and environmental destruction. There is no way to hold brands and governments to account if we can't see what is truly happening behind the scenes. This is why transparency is essential.

We hope that the Fashion Transparency Index inspires us to think differently about the clothes we buy and wear. We hope it inspires more people to scrutinise the brands they buy and to consider how clothes might have been made, where, by whom, under what conditions and at what true cost. We hope this research activates you to try to find out more about the production processes and people behind what you wear.

Find out how to get involved in the campaign:  
[www.fashionrevolution.org/get-involved](http://www.fashionrevolution.org/get-involved)

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

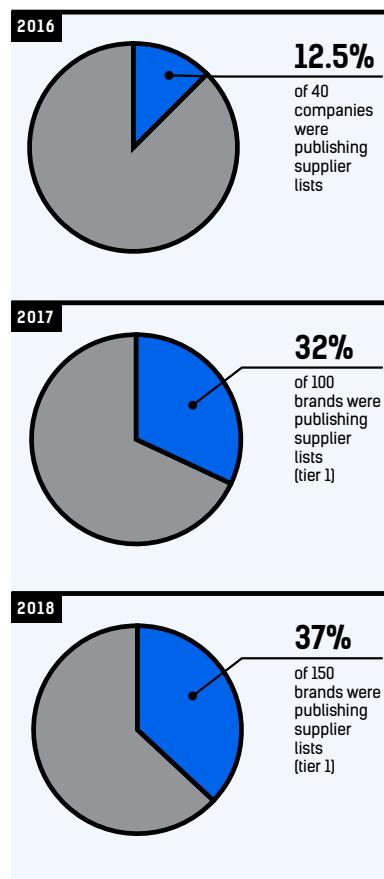
- Encourage more public disclosure from brands. You can do this by using social media to ask brands **#whomademyclothes** and by supporting campaigns that call for brands to publish their supplier lists and supply chain information;
- Write or call policymakers and ask them to do two things:
  - To implement regulation ensuring brands are responsible for the impact they have on the lives of the people working in their supply chains, at home and abroad;
  - Require brands to report transparently about their social and environmental impacts across the entire value chain using a common framework.

# BRANDS AND RETAILERS

We hope the Fashion Transparency Index influences brands and retailers to publish more information about their policies, practices and progress on human rights and sustainability.

This year 37% of the 150 brands we reviewed are publishing tier 1 supplier lists. Many brands and retailers have published for the first time during the past 12 months. We hope that the Fashion Transparency Index influences more brands to disclose their supplier lists with increasingly detailed information – answering the question [#whomademyclothes](#)?

We hope the Fashion Transparency Index also sheds some light on how different brands are communicating their sustainability/CSR initiatives, highlighting where best practices and areas for improvement are emerging. We think it might be interesting for brands and retailers to see how they compare to each other in terms of public disclosure of supply chain information and social and environmental priorities.



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

- Disclose your supplier lists in a searchable format and publish more easy-to-understand information about your social and environmental performance, progress and impacts across the entire supply chain;
- Improve sustainability/CSR communications – make relevant information easier to find and more simple to understand;
- Publish direct contact details for the sustainability/CSR department on your website;
- Answer your customers' [#whomademyclothes](#) requests on social media with specific supplier information, not just your policies.

# GOVERNMENTS AND POLICYMAKERS

**Fashion Revolution believes that laws and regulations are key to transforming the fashion industry.**

There are plenty of international standards set by the United Nations and related bodies such as the International Labor Organisation, and many countries actually have living wages, workers rights and environmental protections written into their Constitutions.

However, enforcement of existing laws is often absent, implementation is weak and there is little opportunity to address violations through the courts. This needs to change.

Transparency is beginning to become subject to legislation. For example, France requires companies to report annually on environmental, social and corporate governance issues. In the UK, companies must now disclose their gender pay gap.

The [UK Modern Slavery Act](#) and [California's Transparency in Supply Chains Act](#) require companies to disclose their efforts to eradicate human trafficking and slavery from their supply chains. The U.S. has recently banned the import of goods made by child and forced labour. The European Union is currently discussing a number of measures that would legally require companies to carry out risk-assessments across their supply chains.

We hope the Fashion Transparency Index helps to demonstrate the need for mandatory due diligence and reporting. We would also like to see governments make companies and their executives legally responsible for what happens in the company's supply chains, regardless of whether the company has direct control or where in the world abuses may be happening. Your constituents deserve to know that the clothes they buy and wear have not contributed to exploitation and environmental degradation.

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

- Better implement and enforce existing laws that are meant to protect workers and the environment everywhere;
- Legislate and support transparency – i.e. mandatory due diligence and standardised disclosure by brands on social and environmental issues;
- Make companies and their executives at home accountable for what happens in the company's supply chains, regardless of whether the company has direct control or where in the world abuses may be happening.

# NGOS, UNIONS AND WORKERS

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

This research helps NGOs, unions and workers to understand what brands are publishing supplier lists, what information is being disclosed, where brands are producing and what policies and procedures brands say they have in place to protect workers and the environment. There are many pioneering NGOs working directly on the ground in producing countries, and we hope this information can help them keep brands accountable for what happens in their supply chains, wherever production is based.

## We encourage NGOs and unions to:

- Join us in encouraging brands to publish supplier lists and more detailed supply chain information;
- Join us in asking policymakers for mandatory due diligence and standardised reporting;
- Support our call for citizens to ask brands [#whomademyclothes](#).
- Please send us information about how you would like to see the fashion industry improve. Let's work together!

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

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# ACKNOWLEDGEMENTS



# THANK YOU!

The Fashion Transparency Index report was written by **Sarah Ditty**, head of policy at Fashion Revolution. It was designed by **Heather Knight**, Fashion Revolution's head of branding and communications, the person who is responsible for giving our movement its visual identity. Design was supported by **Erika Söderholm**. Research was led by **Sarah Ditty** and **Carry Somers**, the co-founder and Global Operations Director of Fashion Revolution – a huge thanks for the diligent efforts of all of you. A very heartfelt thanks to our brilliant research assistants, without whom this report would not have been possible – **Aidan Shaw**, **Ilishio Lovejoy**, **Fionnuala Walravens**, **Aphra Kennedy-Fletcher**, **Eduardo Iracheta** and **Michelle Lai** with further support from **Lowell Chow** and **Sienna Somers**. Huge thanks to Martine Parry for helping this report reach the eyes and ears of the media.

Thank you to the brands and their representatives who took the time to engage with us and complete the 2018 research questionnaire. We know that brands receive frequent requests for information from civil society and NGOs, and it's difficult to respond to them all and still get work done. Your participation is both vital and appreciated.

We would like to say a special thanks to **Nazma Akter**, **Dr Mark Anner**, **Debbie Coulter**, **Christina Hajagos-Clausen**, **Joe Sutcliffe** and **Guy Stuart** for your important written contributions to this report.

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Thanks to all of Fashion Revolution's **Country Coordinators**, who brilliantly and effectively power the movement.

Thank you to **C&A Foundation** and the **European Commission** for your generous support.

**Finally, we would like to thank all of you for reading this report and supporting Fashion Revolution.**

Please consider donating financially to Fashion Revolution so that we can continue to create more resources, such as the Fashion Transparency Index, and spark an even wider global conversation about the impacts of our clothes.

With your help, we can create positive change!

**DONATE:** [www.fashionrevolution.org/donate](http://www.fashionrevolution.org/donate)



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# ANNEX 1: DEFINITIONS & ABBREVIATIONS

**Auditing** is the process of reviewing a company's finances, working conditions, and environmental practices. It uncovers risks to workers' safety and opportunities to improve working conditions.

(Source: [Walk Free Foundation](#))

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

**Closed-loop** refers to a societal system where products and their components are designed, manufactured, used and handled so as to circulate within society for as long as possible, with maximum usability, minimum adverse environmental impacts, minimum waste generation, and with the most efficient use of water, energy and other resources throughout their lifecycles.

(Source: [Green Strategy](#))

**CSR** (Corporate Social Responsibility) is a corporation's initiatives to assess and take responsibility for its effects on environmental and social wellbeing. The term generally applies to efforts that go beyond what may be required by law.

(Source: [Investopedia](#))

**Collective bargaining** is a process where employers and unions negotiate to determine fair wages and working conditions.

(Source: [ILO](#))

**Due diligence** is a process through which companies assesses their impacts on human rights and the environment and then take actions to reduce any negative impacts.

(Source: [United Nations Global Compact](#))

**Equal pay** means that men and women in the same employment performing equal work must receive equal remuneration. This applies not only to salary, but to all contractual terms and conditions of employment, such as holiday entitlement, bonuses, pay and reward schemes, pension payments and other benefits.

(Source: [Equality and Human Rights Commission](#))

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

**Gender pay gap** is defined as the difference in median pay between men and women.

(Source: [Office for National Statistics](#))

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

**Living wage** is a wage a worker earns in a standard working week that is enough to provide for them and their family's basic needs – including food, housing, clothing, education and healthcare.

(Source: [Clean Clothes Campaign](#))

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

**NGO** (Non-governmental organisation) is a group that operates independently of any government, typically one whose purpose is to address a social or political issue.

(Source: [Oxford Dictionary](#))

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

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

(Source: [ETI Norway](#))

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

(Source: [CIRS-REACH](#))

**Supply chain / value chain** refers to all the steps it takes to produce and sell a product, from farm to closet.

(Source: [OECD](#))

**Wet processing facilities** are involved in the production of clothing whose activities typically involve rinsing, bleaching, dyeing, printing, treating or coating fabric and laundering.

(Source: [Garment Merchandising blog](#))

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# CHECK OUT THESE ORGANISATIONS FOR FURTHER RESEARCH:

Anti-Slavery International  
[www.antislavery.org](http://www.antislavery.org)

Clean Clothes Campaign  
[cleanclothes.org](http://cleanclothes.org)

Greenpeace  
[www.greenpeace.org](http://www.greenpeace.org)

Ellen MacArthur Foundation  
[www.ellenmacarthurfoundation.org](http://www.ellenmacarthurfoundation.org)

Ethical Trading Initiative  
[ethicaltrade.org](http://ethicaltrade.org)

Human Rights Watch  
[www.hrw.org](http://www.hrw.org)

International Labor Rights Forum  
[www.laborrights.org](http://www.laborrights.org)

Solidarity Centre  
[solidaritycentre.org](http://solidaritycentre.org)

The Centre for Research on Multinational Corporation (SOMO)  
[www.somo.nl](http://www.somo.nl)

Wikirate  
[wikirate.org](http://wikirate.org)

Please also visit [www.workerdiaries.org](http://www.workerdiaries.org) to discover the Garment Worker Diaries, a yearlong research study of the lives and wages of 540 garment workers in Bangladesh, Cambodia and India, led by Microfinance Opportunities in collaboration with Fashion Revolution and supported by C&A Foundation.

# AN IMPORTANT FINAL NOTE

We are **not** endorsing the brands included in the Fashion Transparency Index, regardless of how they score. By conducting this research, we are **not** promoting the fast fashion business model, which underpins many of the brands included in the Fashion Transparency Index.

Fashion Revolution encourages you to use your voice, your money and your power to transform the fashion industry.

Read our booklet '[How To Be a Fashion Revolutionary](#)' to find out what more you can do.

Be Curious.  
Find Out.  
Do Something.

Finally, we ask you to please share this report with anyone you think might be interested.

# ABOUT FASHION REVOLUTION



**Fashion Revolution** is a global movement which aims to radically change the way fashion is made, sourced and consumed. We believe in an industry that values people, the environment, creativity and profit in equal measure. We have teams in over 100 countries that want to see fashion become a force for good. Read and sign our [manifesto](#).

**"Transparency is visibility.  
We want to see the fashion  
industry, respect its producers  
and understand its processes.  
We want a clear, uninterrupted  
vision from origin to  
disposal to foster dignity,  
empowerment and justice  
for the people who make our  
clothes and to protect the  
environment we all share."**

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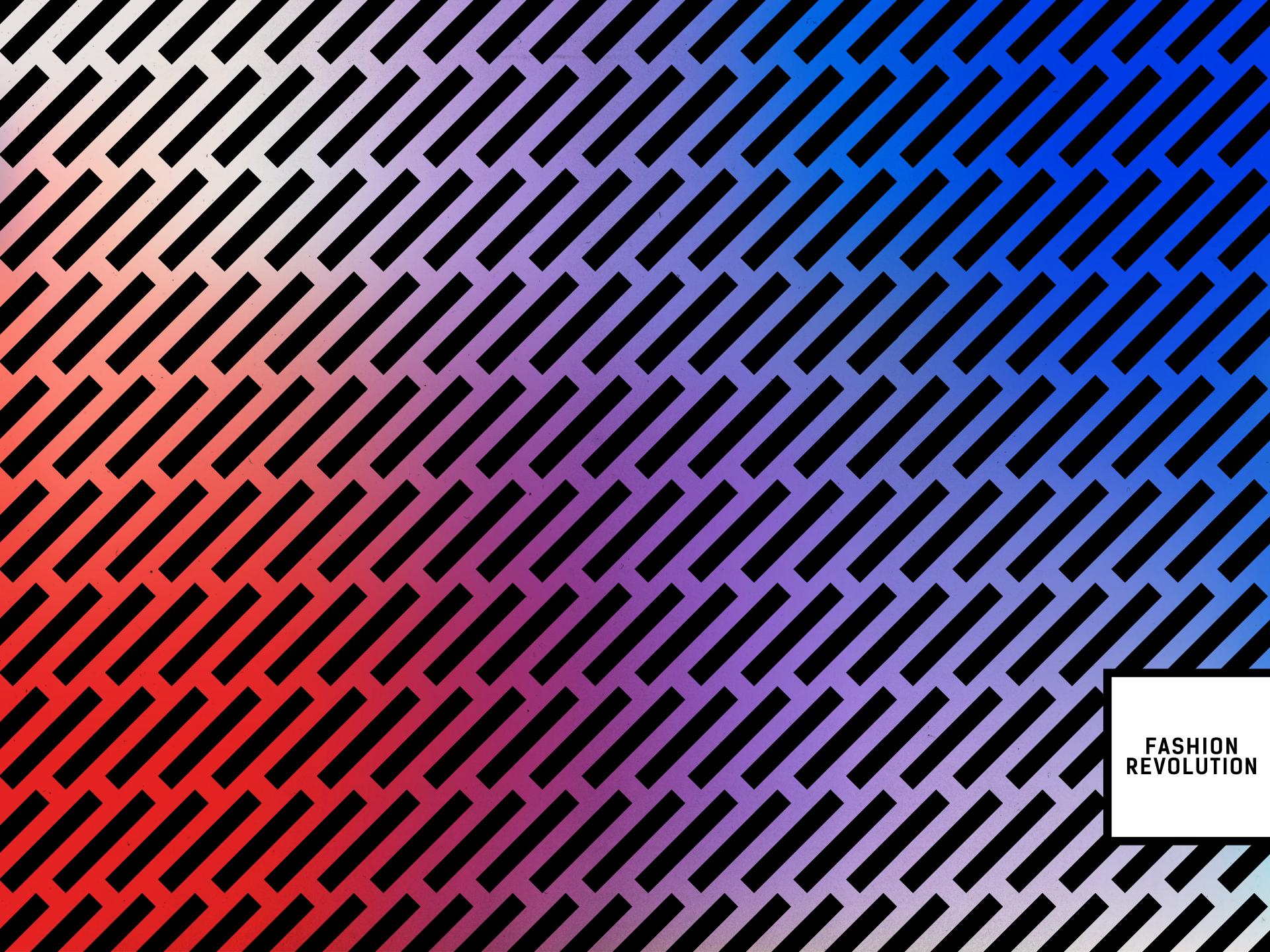
**ORSOLA DE CASTRO**  
CO FOUNDER, FASHION REVOLUTION

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

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 [facebook.com/fashionrevolution.org](https://facebook.com/fashionrevolution.org)



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