



THE APPAREL AND FOOTWEAR SUPPLY CHAIN TRANSPARENCY PLEDGE

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

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

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

PUBLISH MANUFACTURING SITES

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

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

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

[†] The three-month time frame was extended to December 2017 based on the coalition's engagement with apparel companies. See Appendix I for details.

1. Processing factories include printing, embroidery, laundry, and so on

2. Please indicate the broad category—apparel, footwear, home textile, accessories.

3. Please indicate whether the site falls under the following categories by number of workers: Less than 1,000 workers; 1,001 to 5,000 workers; 5,001 to 10,000 workers; More than 10,000 workers.



CHECKLIST FOR COMPANIES EXPRESSING AN INTEREST IN THE TRANSPARENCY PLEDGE



1. Has the company published a list of all its tier-1 supplier factories on its website?

(Please indicate Yes/No)



2. Was the list published this year?

(Please indicate yes/no, and if no, please indicate a rough window of time to expect this publication)



3. Has the company published all its cut-make-trim factory details?

(Please indicate the percentage of business volume and percentage of total supplier factories that will captured by the disclosure)



4. Has the company published details of its authorized subcontractors involved embellishing and finishing (e.g. factories involved in printing, embroidery, and so on)



5. What details per factory has the company published

(Please indicate yes/no)

- Name of factory
- Address of factory
- Rough number of workers
- Product type
- Vendor or Supplier Name
- Factory Group that owns the CMT unit¹
- Any other details, please specify

(For example, trade unions or worker committees per factory as M&S and John Lewis do; numerous other companies publish gender breakdown by factory)



6. How frequently does the company intend to update the information?

(Coalition strongly recommends two times a year)



7. What formats will company publish the information in?

(The coalition recommends downloadable files in Excel, JSON, or CSV formats following industry good practice)

1. This is part of the Transparency Pledge and described as "parent company" information. The coalition believes gathering parent company information will help brands devise useful and impactful human rights due diligence mechanisms to stop, prevent, mitigate, and remediate labor abuses in their supply chain. The coalition defines parent company as a company that has majority ownership or control over a disclosed factory in the apparel company's supply chain. This could be more than one factory within the same country (Ha-Meem Group; Azim group; Windy Group; and so on in Bangladesh) or across different countries (for example, Korean Sae-a Group). Furthermore, a parent company can own one factory that is in the brand's supply chain and other factories (including non-apparel factories, non-manufacturing business, etc.) that are not in the brand's supply chain. Parent companies, especially big holding groups that own a factory, should take more responsibility for human rights due diligence in a factory they control or have majority ownership of because of their leverage and financial capacity. By tracking parent company information, brands may be able to discern patterns of labor abuses across all factories owned by the same holding group, allowing for carefully crafted remedies to be developed on a case-by-case basis.

Apparel brands and retailers that would like to commit to the Pledge should submit the information in this checklist to the Coalition via email at: Transparency@hrw.org. Brands and retailers may also reach out to us at this email address with any questions about the Pledge requirements or this checklist.