
PROMOD SUBMISSION



Clean Clothes Campaign Wage Survey

Response ID:104; Data

1. Login/Password Action

2. Introduction

1. Company name:

PROMOD

2. Brands owned by company:

PROMOD

3. Main contact person:

Name: : VROMAN REGIS

Email: : vroman@promod.fr

Contact phone number: : 00 33 3 20 01 13 41

3. The living wage standard

4. 1.1 What is your company's position on payment of the living wage to workers in your supply chain?

Promod's first aim is to ensure that all its suppliers strictly respect local laws in terms of minimum wages and Health & safety regulations in their factories. They also have to follow the ILO recommendations that take place in the ethical chart they must sign once a year. Payment of a living wage could be the next step. We are discussing with the french branch of CCC to study how to include this program in future and, much important, how to gather a sufficient number of brands around this project to have a real influence . We cannot impose this program on our own because we're not big enough and we need to keep in the market prices. If we want to promote the living wage it has to be balanced by an improvement of productivity in factories to keep normal market prices in our buyings

5. 1.2 Please give the link to the code of conduct which is used when monitoring conditions in your supplier factories. If it isn't publicly available, please upload a copy using the option below.

\\Srvficfra\vroman\$\Documents\Audits

Upload option.

6. 1.3 Does your company agree with the definition of a living wage as given [here](#)?

Yes

If no, please provide details of how your definition of a living wage is different and give justification.

the general idea is fair and can evolve every year regarding the situation of each country. It has to be discussed in detail between stakeholders to make an agreement but it seems workable. The main problem is how to apply it country by country, factory by factory, supplier by supplier. if a brand pays a living wage to one of its suppliers, the whole factory should work this way because they couldn't afford to pay a living wage only

for its orders. the other thing is that this program should be linked to a program of improvement of productivity in the factory. If you better pay people you have to produce more with them to keep competitive in the market. We've seen that in the "fibre citoyenne" program in Morrocco. The social and wage improvements done in the factories are balanced by a better organization in the factories. That's a key point to keep factories in the global market price of factories that comply with law

4. Respect for freedom of association and collective bargaining, a precondition for a living wage

7. 2.1 How has the right to Freedom of Association and Collective Bargaining been clearly communicated to workers in your supplier factories and subcontractors?

as you can check in our code of conduct freedom of association and collective bargaining is included in the document signed every year by our suppliers worldwide. The only way to check whether it is respected by our suppliers is to mandate an external and independant partner specialized in compliance to make an audit. In these audits they should conduct individual and anonymous interviews of workers. This way you can check the respect of freedom of association and collective bargaining but also the non-use of children in production and the non-existence of forced labour

Percentage of supplier factories and subcontractors reached by these measures:

90%

Please supply an example of materials used:

8. 2.2 Do you support or facilitate training for workers to ensure they are aware of their right to freely associate, in conjunction with local independent trade unions or workers' rights organisations? Please supply details:

no

Percentage of supplier factories reached by these measures: : %

9. 2.3 Do you provide training for management of your supplier factories and subcontractors on the right to freedom of association?

no

Percentage of supplier factories and subcontractors reached by these measures:

10. 2.4 Have your supplier factories and subcontractors issued the Right to Organise Guarantee to workers in any of your production units?

	Country:	Number of suppliers:	Details:
1:			
2:			
3:			
4.			

Please provide a sample of materials used in specific countries:

11. 2.5 Do you require supplier factories and subcontractors to sign Union Access Agreements? If yes, please supply details.

no, generally speaking suppliers agree to sign and work with their employees on freedom of association and

collective bargaining, but they don't promote the entrance of a trade union in their factories

Number of supplier factories with agreements:

Please provide a sample of agreements signed:

12. 2.6 Does your company have an accessible, actionable and safe means by which workers can file and follow up on complaints about violations of freedom of association and collective bargaining rights? How do you monitor that this can be accessed freely by workers?:

no

13. 2.7 Have you done any work to limit the use of short term contracts in your supplier factories and subcontractors?

Please provide details of your policy and its impacts in relevant countries: : the first action we had was to create partnerships on a long term basis with our main suppliers in each country. 20% of our suppliers are making 80% of our business. Our oldest suppliers are working with us for more than 15 years. It avoids excessive pressure on a constantly shifting set of suppliers. secondly, we try to spread out our orders on the whole year. On basic items, it's really easier because we can almost feed lines yearly with our programs. That gives you and opportunity to get better prices because you are a regular customer that gives orders even in the low season. The line's productivity is better and the owner can give you better prices because he produces more with the same number of people. Workers are interested on production level through bonuses policies. For other items we need more reactivity because we follow customers choices. But even there we can split our orders all year long when all brands come at the same time, place their order very early and all request the same delivery dates, the temptation is high for the owner to take all the business and subcontract without informing his customers

14. 2.8 Is there anything else you would like to tell us about work you have done so far, or work you are planning, to promote the right to freedom of association in your supply chain?

No

5. Dialogue and negotiation with labour rights organisations

15. 3.1 Please provide details of any active collaborative work undertaken with independent trade unions or labour rights organisations in your sourcing countries:

we will organize a first visit of 2 factories in Bangladesh with the french branch of CCC by the end of Oct 2013
They will be able to ask questions to the owners of factories and visit the production sites

16. 3.2 Have any of your collaborations resulted in unions or bargaining processes starting within your supplier factories?

no

6. 4. Benchmarks for a minimum living wage

17. 4.1 Does your company have internal figures that it uses to benchmark living wages for each sourcing country or region?

No

If yes, please provide details of how these were developed and how they are used:

we only have information on legal wages through specialized press and suppliers information

18. 4.2 Please provide information about the figures you are using to benchmark a living wage in your 3 main production countries or regions.

	Country/region	Living wage benchmark
1.		
2.		
3.		

19. 4.3 Please give details of the number of your supplier factories in Asia that are currently paying the Asia Floor Wage.

	Country/region	Number of supplier factories paying Asia Floor Wage
1.		
2.		
3.		
4.		
5.		

7. Purchasing practices that make living wages possible

20. 5.1 Is your company doing work to limit the use of subcontractors in your supply chain and/or consolidate your supplier factory list? Please provide details:

First point: the subcontracting of our productions is strictly prohibited in the ethical code our suppliers are signing worldwide every year.

all the factories used for our productions have to be approved by our team. Some suppliers have factories that are not approved and should focus our productions on approved factories. Our team makes random control on production sites to check whether productions are really in the declared factories

the last point we already mentioned is the use of partners factories to avoid a constantly shifting set of suppliers with uncertain commitment to compliance with our code of conduct

21. 5.2 Does your company operate a policy of buyers favouring supplier factories that consistently meet a high wage standard? How?

our company is operating a policy of buyers favouring suppliers that are involved in a continuous improvement process on all aspects of social & environmental compliance. Respect of minimum wages and promotion of bonuses policies based on productivity is one element out of our policy

22.

23. 5.3 Does your company break down and calculate whether FOB prices per piece are sufficient to allow for compliance with the wage standard your company has set out in its code of conduct?

under french law regarding hidden labour, the buyer should be considered as a professional and should know the minimum price he should pay to comply with law

we think it's the same for international business. If one supplier gives us an abnormally low price,, we should investigate to understand why. the better price you can obtain should be explainable, for example, because you order the same item on the same production line for a long period. In that case, the supplier will anticipate a better productivity and can lower his price

24. 5.4 Does your company operate a policy of buyers favouring supplier factories that support the

establishment and functioning of genuine trade unions, and those with collective bargaining agreements?

our company is operating a policy of buyers favouring suppliers that are involved in a continuous improvement process on all aspects of social and environmental compliance. Respect of freedom of association and collective bargaining is one aspect of this policy . the only way to control that is to interview anonymously workers during social audits

25. 5.5 Please provide information about any other work your company has done / is planning to do on improving your purchasing practices, in relation to wages.

Nil

8. Living wage projects

26. Please provide details of any projects here. Please note you can cut and paste long pieces of text into these small boxes if necessary:

	Project 1	Project 2	Project 3	Project 4
Location:				
Number of factories and workers involved:				
Living wage benchmark used:				
Partnerships:				
Wage increase achieved:				
Details of process:				

27. Please upload any useful supporting documentation here:

9. New Page

28. 7.1 Have you publicly supported calls from civil society and unions to increase the minimum wage to a living wage standard in your production countries? Have you made this position clear towards governments and employers associations?

no

29. 7.2 As part of this work, have you issued a public statement assuring country governments that you will not relocate production as a result of minimum wage legislation that ensures a living wage?

no

10. Transparency

30. 8.1 Does your company publish a full public list of supplier factories, and sub contractors, their locations and products?

no

Do you have plans to publish a full list in the future?

no

31. 8.2 Does your company publish impact reports on projects related to wages?

no

11. Collaborative working

32. 9.1 Please provide details of your involvement with any multi-stakeholder initiative projects working to improve wages:

we work with the french NGO Yamana on the "fibre citoyenne" (citizen fiber) program in Morroco. this program is working for a few years in Morroco and Yamana works with different stakeholders to extend this program to Tunisia.

the program is starting with a collaboration between the factory owner and an expert to work on 2 joint subjects: respect of local law regarding wage and social benefits and improvement of organization in the factory to get results in terms of productivity. Improvement of wages is possible if the organization of factory is evolving to permit achievement of a better productivity . This way you can pay more wages and keep competitive on the international market

33. 9.2 Please provide details of any work you have initiated outside an MSI, directly with other companies which has improved wages:

nil

34. Supporting documents:

12. 10. A clear route map for implementing a living wage for all workers

35. 10.1 Has your company developed a strategy for delivering a living wage in your supply chain? Is this a public commitment?

not yet

we are starting to work on this subject and have discussions with the french branch of CCC

we would be interested in working with all stakeholders in future to find workable solutions to this issue

36. 10.2 Does this strategy have a time scale? If yes, please state.

we don't have any time scale for the moment

37. 10.3 What consultation have you carried out on this strategy, both within and outside your company?

38. 10.4 How will you ensure that vulnerable workers, such as homeworkers or migrant workers are also included in efforts to increase wages?

actually, only social audits with individual and anonymous interviews of workers can give us informations

39. 10.5 Is there anything else you would like to tell us about your work on the living wage that hasn't been covered in this survey?

no

13. Further questions about your supply base

40. 1. What are your main production countries? Please state percentage of total production per country and the number of supplier factories.

	Country	Percentage of production	Number of suppliers
1	China	31%	81 out of which 10 are making 75% of the business
2	Morocco	18%	30 suppliers out of which 10 are making 65% of the business
3	Bangladesh	14%	11
4	Tunisia	12%	28 suppliers/7 are making 55% of the business
5	India	6%	46 / 5 are making 50% of the business
6	Turkey	5%	34
7	Mauritius	4.5%	2
8	Pakistan	1%	4
9	Spain	1%	10
10	Vietnam	1%	5

41. 2. What kind of trade partners are part of the sourcing structure? Please indicate an approximate % of volume share of your production:

Production at factories owned by your company: : %0
 Orders placed directly to supplier factories: : %65%
 Orders placed through agencies or intermediates: : %35%
 Other: : %

42. If other, please specify.

43. 3. What is the length of time that you have been working with your current suppliers?

	% of suppliers
More than 5 years:	70%
2-5 years:	15%
Less than 2 years:	15%

44. 4. How many sites did you use to produce your goods in 2012?

First tier suppliers: : around 250

45. 5. How many supplier factories do you trade with where you have a regular production share of more than 25%?

Number of suppliers: : around 20
 Please list suppliers, country and % of product share at the factory: : we are working in CMT in countries like Morocco and Tunisia. We buy fabrics and trimings and send them to subcontractors working for us. As these factories are not huge (200 people in average) they often focus on 4 to 5 customers. As we are regular customers in these factories we can have a share between 20% to 50% depending on factories & period of the year

Response Location

Country:	France
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Region:	B4
City:	Marcq-en-baroeul
Postal Code:	
Long & Lat:	Lat: 50.681599, Long:3.0956