



Eddie Bauer

Corporate banners: Eddie Bauer
Type of company: Public, EBHI: NASD

Notes on Findings	Company Score	Question Weighting (% of section)
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1. Governance and Risk Management

1.1 Board level responsibility for ethical issues in the supply chain -No reported evidence of formal board sub-committee or board member with explicit responsibility for ethical issues in supply chain	0	40
1.2 Reporting of labour standards issues in the supply chain as a risk factor -No mention of labour standards issues as a risk factor	0	30
1.3 Risk analysis of labour standards issues in the company's existing supply chain -Fair Labour Association (FLA) conducts risk assessment to determine which factories will be subject to independent external monitoring <i>p.21-22, FLA Charter document (http://www.fairlabor.org/all/about/FLAcharter.pdf)</i>	100	30
Section total score / section weighting	30	X 10%

2. Code for Labour Standards in the Supply Chain

2.1 Quality and scope of the code for labour standards in the supply chain -There is a "Factory Workplace Code of Conduct" -It covers the core ILO conventions but limits the company's commitment to: -Child labour: <i>"No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15."</i> -It allows exceptions to the hours of work standards for "extraordinary circumstances" without defining them. -It does not include living wage requirements	25	60
2.2 Publication and availability of the code for labour standards in the supply chain -Code is available on their website <i>http://investors.eddiebauer.com/responsibility/global_labor.cfm</i>	100	20
2.3 Application of the code for supply chain labour standards -Code applies to entire breadth of production. <i>http://investors.eddiebauer.com/responsibility/global_labor.cfm</i>	100	20
Section total score / section weighting	55	X 15%

3. Stakeholder Engagement

3.1 Multi-stakeholder processes -Member of FLA	100	30
3.2 Engagement with NGOs and/or trade unions relating to labour standards in the supply chain -There is evidence of engagement over time with NGOs including in the country of manufacture <i>p.100, 2005 FLA Annual Report; p.67, 2006 FLA Annual Report</i>	75	30
3.3 Worker and third party complaints - workers and third parties have access to FLA third party complaints process	66.7	40
Section total score / section weighting	79.2	X 20%

4. Management

4.1 Resource commitment -There is a Director of Public Affairs and Corporate Social Responsibility in charge of their Global Labor Practices program, but they are more than 2 reporting levels from the Board. <i>p. 66, 2006 FLA Annual Report</i>	50	25
4.2 Training for buying agents -evidence of ongoing training programs for sourcing staff. <i>p. 67, 2006 FLA Annual Report; p.27, 2003 FLA Annual Report; 2004 FLA Annual Report</i>	100	25
4.3 Training for factory management personnel and workers -Some reported evidence of training for factory management; no reported evidence of training for workers. <i>p. 26, 2003 FLA Annual Report</i>	33.3	25
4.4 Rewards and incentives -No reported evidence	0	25
Section total score / section weighting	45.8	X 20%

5. Supply Chain Auditing and Reporting

5.1 Commitment to auditing labour standards in the supply chain -There is a commitment to auditing across the entire breadth of the supply chain. http://investors.eddiebauer.com/responsibility/global_labor.cfm	100	15
5.2 Status of the audit schedule -An auditing work plan has been scheduled and is currently being implemented - Percentage of factories are audited by FLA <i>p. 66, 2006 FLA Annual Report</i>	100	5
5.3 Public disclosure of manufacturing sites -No reported evidence	0	10
5.4 Transparency of the labour standards auditing methodology - FLA auditing methodology is available through www.fairlabor.org and follows generally accepted practices. - Methodology used by internal monitors or other third party monitors is not publicly available	100	15
5.5 External verification of labour standard audits -Fair Labor Association audited 8 facilities in 2005. <i>p. 66, 2006 FLA Annual Report</i>	66.7	5
5.6 Reporting the results of audits of labour standards in the supply chain -There is some disclosure and analysis of audit findings at the factory or supplier level. <i>See FLA tracking charts (www.fairlabor.org)</i>	60	20
5.7 Dealing with non-compliance -There is a staged approach for dealing with non-compliance with the code. http://investors.eddiebauer.com/responsibility/global_labor.cfm ; p.28, 2003 FLA Annual Report	100	15
Section total score / section weighting	75.3	X 35%

Total Score **63** /100