

# FASHION TRANSPARENCY INDEX

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02	WHY TRANSPARENCY IS THE BEGINNING OF A FASHION REVOLUTION
05	RESEARCH METHODOLOGY
07	THE FASHION TRANSPARENCY INDEX RESULTS
13	WHAT DO THE RESULTS SHOW?
15	POSITIVE EXAMPLES
16	CONCLUSION
17	GET INVOLVED
18	REFERENCE & APPENDIX
19	ABOUT THIS REPORT

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# WHY TRANSPARENCY IS THE BEGINNING OF A FASHION REVOLUTION

*Three years ago on  
24th April, 1,134  
people were killed  
in the Rana Plaza  
garment factory collapse  
in Bangladesh.*

The factories operating in that building made clothes for over a dozen well-known international clothing brands. It took weeks for some companies to determine whether they had contracts with those factories despite their clothing labels being found in the rubble.

Fashion Revolution and Ethical Consumer feel passionately that tragedies like Rana Plaza must never happen again. Today, both people and the environment suffer as a result of the way fashion is made, sourced and purchased. It's time for a Fashion Revolution, and we believe that the beginning of this process is transparency.



## COMPLEXITY OF SUPPLY CHAINS

Fashion supply chains are typically long and very complex. Some brands may work with thousands of factories at any given time – and that is just the facilities that cut, sew and assemble our garments, but there are also further facilities down the chain that dye, weave and finish materials and farms that grow fibres too. During the manufacturing process our clothes are touched by a great many pairs of hands before they reach the rails or shelves of the shop floor.

Many companies do not really know where their clothes are being made. The vast majority of today's fashion brands do not own their manufacturing facilities, making it difficult to monitor or control working conditions throughout the supply chain. 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 presents a great challenge for brands themselves as well as the people working in the supply chain who become invisible in this process.

## THE IMPORTANCE OF TRANSPARENCY

Lack of transparency costs lives. It is impossible for companies to make sure human rights are respected and that environmental practices are sound without knowing where their products are made, who is making them and under what conditions. If you can't see it, you don't know it's going on and you can't fix it.

Transparency means companies know who makes their products – from who stitched them right through to who dyed the fabric and who farmed the cotton. When companies are working in a transparent way, this also implies openness, communication and accountability across the supply chain and with the public too.

At the moment the public do not have enough information about where and how their clothes are made. Shoppers have the right to know that their money is not supporting exploitation, human rights abuses and environmental destruction. There is no way to hold companies and governments to account if we can't see what is truly happening behind the scenes. This is why transparency is essential.

Being transparent creates the opportunity for collaborative action between companies, governments, NGOs, unions and the public to work towards building a fairer, cleaner and safer fashion industry.

**We need more transparency from the fashion industry. Transparency involves openness, communication and accountability.**

# THE FASHION TRANSPARENCY INDEX

*Together Ethical Consumer and Fashion Revolution wanted to find out what companies are doing towards improving social and environmental standards and how much of that information they share with the public.*

As a first step, Fashion Revolution and Ethical Consumer have partnered up to publish a Fashion Transparency Index which ranks companies according to the level of transparency in their supply chain.

The first edition of the Fashion Transparency Index includes 40 of the biggest global fashion brands, which we have selected based on annual turnover. We relied on publicly available financial information to choose this selection of brands and their inclusion was not voluntary. We aimed to choose brands from a variety of sectors – high street, luxury, sportswear, accessories, footwear and denim.

For consumers, the Fashion Transparency Index aims to give you some insight into just how little we know about the things we buy and wear. We hope it encourages you to want to find out more about the story of your clothes.

For brands and retailers, we hope the Fashion Transparency Index inspires you to publish more about your policies, practices, products and the people making your clothes – answering the question **#whomademyclothes**.

There is no doubt that the goal of transparent fashion supply chains is challenging. But we are beginning to see that some companies are beginning to make a real effort while others have a long way to go. With this Index, we hope to track the fashion industry's progress towards greater transparency, ensuring that together we are pushing for more information and better practices.

**We want more brands and retailers to be able to answer the question **#whomademyclothes?****



# RESEARCH METHODOLOGY

*The Fashion Transparency Index uses a broad brushstroke approach.*

The research has been designed to give you an illustrative look at how much brands know about their supply chains, what kind of policies they have in place and importantly, how much information they share with the public about their practices and products. As such, the Index does not offer an in-depth analysis of the content of a company's policies or performance in any given area.

It uses a ratings methodology, which benchmarks companies against current and basic best practice in supply chain transparency in five key areas:

## **POLICY & COMMITMENT**

What are the standards and goals the company sets itself for the protection of workers and the environment across its supply chain? What information do they make public about these policies and commitments?

## **TRACKING & TRACEABILITY**

How well does the company know its supply chain, and what information do they share publicly about who and where products are made?

## **AUDITS & REMEDIATION**

How does the company go about checking its supply chain for compliance with its policies, international standards and local laws? How does the company deal with its suppliers that fail to meet these obligations? How much information do they make public about these activities?

## **ENGAGEMENT & COLLABORATION**

To what extent does the company work with multi-stakeholder initiatives, NGOs, unions and civil society to tackle social and environmental issues in its supply chain? And are these activities communicated publicly?

## **GOVERNANCE**

What checks and balances does the company have in place and who is responsible within its own organisation for ensuring initiatives that address labour standards are implemented? And what information regarding governance is publicly available?

# RESEARCH METHODOLOGY

## *continued*

All 40 companies included in the index were invited to fill out a questionnaire, which helped us to better understand their policies, activities and communications.

In total we received 10 replies, and the other 30 were scored based upon information available on their website and in their annual reports.

For the companies that did not reply, it is impossible for our researchers to know anything beyond what they are communicating publicly online. Therefore these companies may have received lower scores while companies who did fill out the questionnaire had the opportunity to tell us more and thus potentially score higher. Any company wishing to have their score updated may do so if new information is made available for our research team to investigate.

This means that overall the companies publishing the most information about their supply chain practices online or via other public communication channels will likely have received the higher scores.

Broadly, under each key area marks were allocated on a sliding scale summarised below:

### ● LOW RATING

Little to no evidence that the company has more than a Code of Conduct in place. The company is making little effort towards being transparent about their supply chain practices.

### ● LOW-MIDDLE / ● HIGH-MIDDLE RATING

The company is making some notable efforts on social and environmental issues, but could be doing much more.

### ● TOP RATING

The company is making significant efforts in the given areas, and has made some or most of this information publicly available.

The top scores **do not** mean that the company has a fully transparent supply chain or is acting beyond its policy commitments. Whilst these companies should be congratulated for providing more information about their practices and products than most, there is a long way to go before any of the companies included in this Index will be able to fully answer **#whomademyclothes**.

# THE RESULTS

**0-25%**

LOW RATING

Chanel  
 Hermes  
 Claire's Accessories  
 Forever 21  
 Fendi  
 LVMH  
 Monsoon Accessorize  
 Prada  
 Michael Kors  
 Aeropostale  
 Under Armour

**26-50%**

LOW-MIDDLE

Ralph Lauren  
 Polo Ralph Lauren  
 URBN  
 New Look  
 Gucci  
 Victoria's Secret  
 Hugo Boss  
 J Crew  
 ASOS  
 Burberry  
 Coach  
 Lululemon  
 Next  
 Abercrombie & Fitch  
 Arcadia Group  
 Topshop  
 Mango

**51-75%**

HIGH-MIDDLE RATING

American Eagle  
 Gildan Activewear  
 Uniqlo  
 Converse  
 Nike  
 PVH  
 Gap  
 Primark  
 Adidas

**76-100%**

TOP RATING

H&M  
 Inditex  
 Levi Strauss & Co

# THE RESULTS

*continued*

	POLICY & COMMITMENTS %	TRACKING & TRACEABILITY %	SOCIAL & ENVIRONMENTAL AUDITS & REMEDIATION %	ENGAGEMENT & COLLABORATION %	GOVERNANCE %	QUESTIONNAIRE %	TOTAL SCORE %
Chanel	0	0	29	0	0	✗	10
Hermes	43	0	21	0	14	✗	17
Claire's Accessories	29	0	29	0	14	✗	17
Forever 21	14	0	43	0	14	✗	19
Fendi	14	0	43	0	14	✗	19
LVMH <small>*Berluti, Céline, Dior, Donna Karan, EDUN, Emilio Pucci, Fendi, Givenchy, Kenzo, Marc Jacobs, Moynat, Loewe, Loro Piano, Louis Vuitton, Nicholas Kirkwood, Thomas Pink, R.M. Williams</small>	14	0	43	0	14	✗	19
Monsoon Accessorize	29	11	29	10	14	✗	20
Prada <small>*Prada, Miu Miu, Church's, Car Shoe, Marchesi 1824</small>	43	22	7	20	29	✓	21
Michael Kors	29	0	50	0	0	✗	21
Aeropostale	29	11	43	0	14	✗	24
Under Armour	29	0	43	10	29	✗	25
Ralph Lauren <small>*Including Club Monaco</small>	57	0	57	0	29	✗	33
Polo Ralph Lauren	57	0	57	0	29	✗	33

# THE RESULTS

*continued*

		POLICY & COMMITMENTS %	TRACKING & TRACEABILITY %	SOCIAL & ENVIRONMENTAL AUDITS & REMEDIATION %	ENGAGEMENT & COLLABORATION %	GOVERNANCE %	QUESTIONNAIRE %	TOTAL SCORE %
URBN	*Urban Outfitters, Anthropologie, Free People, BHLDN, Terrain, Vetri Family	29	33	43	0	43	✓	33
New Look		57	33	21	50	43	✗	37
Gucci	*part of the Kering group	64	33	29	10	43	✗	38
Victoria's Secret		64	0	64	10	43	✗	40
Hugo Boss		50	11	71	0	43	✗	42
J Crew		57	22	57	10	43	✗	42
ASOS		64	28	43	20	57	✗	43
Burberry		64	6	50	20	71	✗	43
Coach		57	11	64	0	57	✗	43
Lululemon		71	39	50	20	29	✗	44
Next		71	28	43	50	43	✗	45
Abercrombie & Fitch		71	11	64	20	43	✗	45
Arcadia Group	*Topshop, Burton Menswear, Dorothy Perkins, Evans, Miss Selfridge, Outfit, Topman, Wallis	64	50	50	10	57	✗	49
Topshop		64	50	50	10	57	✗	49

# THE RESULTS

*continued*

	POLICY & COMMITMENTS %	TRACKING & TRACEABILITY %	SOCIAL & ENVIRONMENTAL AUDITS & REMEDIATION %	ENGAGEMENT & COLLABORATION %	GOVERNANCE %	QUESTIONNAIRE %	TOTAL SCORE %
Mango	57	33	64	40	43	✗	50
American Eagle	57	28	79	30	43	✗	52
Gildan Activewear	57	22	71	40	71	✓	55
Uniqlo	79	11	71	40	71	✗	56
Converse	79	39	57	20	86	✗	57
Nike <small>*Nike, Nike+, Jordan, Converse, Hurley</small>	79	39	57	20	86	✗	57
PVH <small>*Calvin Klein, Tommy Hilfiger, Van Heusen, IZOD, ARROW, Speedo, Warner's, Olga</small>	64	44	79	40	43	✓	58
Gap <small>*Gap, Banana Republic, Old Navy, Athleta, Intermix</small>	100	44	71	50	57	✓	65
Primark	86	56	64	60	71	✓	67
Adidas	79	72	71	80	57	✓	69
H&M <small>*H&amp;M, COS, Weekday, Monki, Cheap Monday, &amp; Other Stories</small>	79	83	71	80	71	✓	76
Inditex <small>*Zara, Bershka, Pull&amp;Bear, Massimo Dutti, Stradivarius, Oysho, Zara Home, Uterqüe</small>	79	61	93	80	100	✓	76
Levi Strauss & Co <small>*Levi's, Dockers, Signature, Denizen</small>	86	61	86	60	86	✓	77

# THE RESULTS

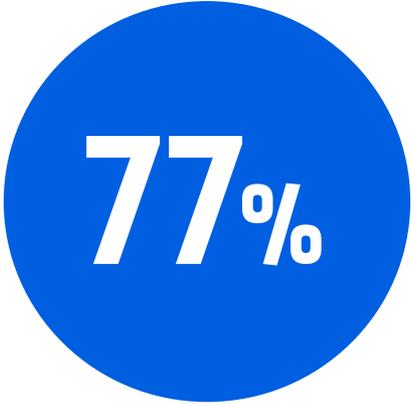
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42%

AVERAGE SCORE

*for the 40 brands  
we surveyed*



77%

TOP SCORE

*Levi's Strauss & Co*



10%

BOTTOM SCORE

*Chanel*

# A ROUGH GUIDE TO THE SCORING

## 0-25%

These companies have little to no information about their supply chain practices available to the public. Many of these companies seem to do little more than have a Code of Conduct in place – whilst this might have been best practice in the 1990s, Corporate Responsibility has moved on a great deal in the last twenty years. These companies appear to be those at the beginning of the road towards best practice and transparency.

### **POSITIVE STEPS TAKEN:**

Minimal

### **ROOM FOR IMPROVEMENT:**

All areas

## 26-50%

These companies seem to be making some efforts to manage and improve their supply chains but make little supply chain information publicly available. These companies still have a long way to go towards supply chain transparency.

### **POSITIVE STEPS TAKEN:**

Policies and commitments in place and some steps taken in other areas

### **ROOM FOR IMPROVEMENT:**

Auditing & reporting; tracking & traceability; engagement & collaboration & governance; and more transparent communications.

## 51-75%

These companies seem to be doing a bit more than the others when it comes to having policies and commitments in place and auditing and reporting activities. Despite making some good efforts to monitor standards, these companies seem to be lacking in many areas and offer some public supply chain transparency but not enough.

### **POSITIVE STEPS TAKEN:**

Policy & commitment; auditing & reporting

### **ROOM FOR IMPROVEMENT:**

Tracking & traceability; engagement & collaboration; governance; and more transparent communications.

## 76-100%

Only three companies have scored in this range. Levi Strauss & Co scored highest with 77. They are doing more than most other brands to communicate publicly about their supply chain practices. They seem to have many robust systems in place for tracking, tracing, monitoring and improving labour and environmental practices across the supply chain. The other two companies to score a top rating are H&M and Inditex both come in just one percentage point behind Levi's at 76%. However all the companies in this section still have a long way to go towards being fully transparent.

### **POSITIVE STEPS TAKEN:**

All areas

### **ROOM FOR IMPROVEMENT:**

More stakeholder engagement; better tracing of products down to sources of raw material; and even more transparent communications with the public.

# WHAT DO THE RESULTS SHOW?

## *Strongest areas:*

### **POLICY & COMMITMENT**

In this area, the majority of the companies score well on having policies on environmental and labour standards in place and communicating them publicly. But there is a noticeable absence of long-term thinking in their sustainability strategies.

Only three of the companies (Gap, Primark, Levi Strauss & Co.) appear to be looking to the future with clear long-range (2020 or beyond) aims, which include defined end-goals and quantified targets along the way – as well as an explicit commitment to transparency.

H&M, Inditex and Nike (which includes Converse) are the only other companies to publish quantifiable targets towards improving standards and performance across the supply chain over time. However, they do not appear to communicate any specific targets on transparency.

Additionally, only a few companies show evidence of policies that target the engagement of suppliers further down the supply chain, eg. engaging directly with fabric mills.

### **AUDITING & REMEDIATION**

Most companies provide information on audit procedures and schedules publicly, along with some limited disclosure of audit results. Levi Strauss & Co appears to publish the most information about their monitoring practices and corrective action plans.

Roughly 28% of companies do not communicate about taking any special measures to monitor the more difficult issues in the supply chain (eg. improving conditions for homeworkers, eliminating forced labour, or eradicating Sumangali practices, a form of child labour), nor disclose in detail how they work with factories that show non-compliances in order to ensure they improve working conditions.

Many companies surveyed have legal obligations to monitor and disclose supply chain issues via the California Transparency in Supply Chains Act of 2010, which means a company must disclose on its website its initiatives to eradicate slavery and human trafficking from its direct supply chain for the goods offered for sale. A company must disclose to what extent it: (1) engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery; (2) conducts audits of suppliers; (3) requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the countries in which they are doing business;

(4) maintains accountability standards and procedures for employees or contractors that fail to meet company standards regarding slavery and human trafficking; and (5) provides employees and management training on slavery and human trafficking. A similar law has just come into effect in the UK, the Modern Slavery Act 2015 and applies to companies with an annual turnover of £36 million or more. However, most luxury brands surveyed offer little to no public information about how they monitor working conditions, with the exception of Burberry, Hugo Boss and Michael Kors.

### **GOVERNANCE**

60% of companies surveyed appear to have a system in place to monitor compliance with labour standards, and to continually improve standards, with responsibility at the executive board level.

# WHAT DO THE RESULTS SHOW?

## *Weakest areas:*

### **TRACKING & TRACEABILITY**

Just over half the companies (60%) surveyed seem to be making some efforts in this area, such as holding internal databases of their cut-make-trim (CMT) suppliers – the ‘first tier’ of the supply chain.

Only five brands (Adidas, H&M, Levi Strauss & Co, Nike – which includes Converse) reflect best practice in holding a publicly available list of all or the vast majority of their CMT suppliers. 24 companies state that they track their suppliers and/or their locations, but do not publish this information publicly. 12 companies appear not to track the first tier of their supply chain, or at least this information is not publicly available.

Only two companies (Adidas and H&M) publish details of their second-tier suppliers (fabric and yarn mills or subcontractors). However, the majority of the 40 companies surveyed appear to have little (30% of companies surveyed) or nothing (53%) in place to demonstrate that they monitor where raw materials and other resources (such as zips and other component parts) come from.

The ‘second tier’ of the supply chain (and third, fourth, etc.) seems to remain largely unknown territory for most companies surveyed.

### **ENGAGEMENT & COLLABORATION**

Only 11 of the companies in the Index show evidence of working with trade unions, civil society or NGOs on the ground in supplier countries to improve working conditions. Trade unions in particular are vital in providing garment workers with the means to demand better working conditions and pay from their employers.

The Engagement & Collaboration part of the Index also looks at membership of Multi-Stakeholder Initiatives (MSIs). MSIs bring together lots of different stakeholders in order to find common solutions to problems, such as the Ethical Trading Initiative, Sustainable Apparel Coalition, Textile Exchange and others.

Our list of MSIs includes the Bangladesh Accord, an initiative set up in the wake of the Rana Plaza factory collapse, working to ensure improved health and safety standards in Bangladesh’s garment factories. Given that Bangladesh is the world’s second largest garment exporter, many of the companies included in the Index are likely to be sourcing from the country. In this Index we considered participation in the Accord important.

However, not every company in this Index will be sourcing from Bangladesh but because most do not publish their factory lists we do not know which companies are sourcing from this country.

A majority of companies (26) are involved with at least a few of the eight MSIs that we looked for engagement with. But no company is a member of all eight initiatives. 14 companies surveyed, mostly luxury brands, do not appear to engage with any of them at all, showing a lack of industry collaboration on social and environmental issues.

### **GOVERNANCE**

19 of the companies surveyed (40%) do not appear to have a system in place to monitor compliance with labour standards and to continually improve standards, both at Board level (eg. an executive corporate responsibility committee) and at departmental level (eg. a Social Responsibility team). Human rights and environmental protection should be the responsibility of company executives as well as at department level. In addition 15 companies (38%) show no evidence of incorporating labour standards into buying practices.

We are also surprised by the large number of companies (30%) that do not appear to have whistleblowing or confidential complaint mechanisms in place for workers in their supply chain, or at least none that they mention publicly. This means that workers may have little chance to speak up about poor conditions or abuse, or may not be able to do so without fear of repercussion.

# POSITIVE EXAMPLES

## 'SUPPLIER CLUSTERS'

Inditex has 10 [supplier clusters](#) in the geographic areas in which it has a larger and stronger presence: Spain, Portugal, Morocco and Turkey (these four countries comprise about 60% of the company's supply chain); India, South East Asia, Bangladesh, China, Brazil and Argentina. These clusters covered 91% of Inditex's production in 2014 and "are regularly consistently under review". Through these clusters, Inditex works with trade unions, NGOs and civil society on labour rights.

## PUBLISHING FACTORY LISTS

[Adidas publishes a list of subcontractors](#) (eg. specialist printing, mould production, or embroidery services) as well as a CMT list on its website. [H&M has mapped 99% of its production volume](#), publicly publishes 95% of its first tier CMT list and 35% of its fabric and yarn suppliers. In this area both Adidas and H&M demonstrated the highest levels of transparency of all 40 companies in this Index.

## WORKING WITH NGOS AND TRADE UNIONS

Gildan works with the Maquila Solidarity Network – a labour and women's rights advocacy organisation that promotes solidarity with grassroots groups in Mexico, Central America and Asia, and works to improve conditions in maquiladora factories and export processing zones. The company says: "Through dialogue with MSN, we have applied their input in the development of a remediation plan following the closure of our El Progreso plant in Honduras. Since then, [Gildan](#) has been working collaboratively with the MSN regarding labour practices and freedom of association at its various manufacturing locations. We continue to remain in dialogue with MSN regarding our corporate social responsibility practices."

## INTEGRATED REPORTING

Kering Group (the company that owns Gucci) has developed a tool to measure and calculate the financial value of its environmental impacts throughout its supply chain – known as [Environmental Profit & Loss](#). Its 2013 report revealed that 93% of the Group's environmental impact falls within its supply chain. In 2015 Kering made the EP&L methodology open-source.

## PUBLISHING LIFECYCLE ANALYSIS RESEARCH

[Levi Strauss & Co](#) has set itself the goal to increase the percentage of its own products made with Water<Less™ techniques to 80% by 2020 – a technique to reduce water used in wet processing of jeans and other clothes. Levi's has also published a lifecycle analysis of a pair of jeans, which sets out the impacts at different stages of manufacture. The company has made its research publicly available online so that other companies can make use of it.

## GOING BEYOND 1ST TIER

[Gap](#) partnered with 20 strategic mills in China, India, Pakistan and Taiwan to conduct environmental assessments using the Sustainable Apparel Coalition's Higg Index and has since expanded the programme to include 20 more strategic mills in 2015.

# CONCLUSION

*Big global brands have a lot of work to do to show their commitment to transparency.*

Some companies are taking steps in the right direction, Levi Strauss & Co, H&M and Inditex offer the most information about their policies, strategies and performance on social and environmental issues throughout the supply chain. However, there is a lot they don't tell the public too, especially when you look past the first-tier.

Publishing supplier lists for the first-tier is possible; some brands have done it but not nearly enough. Inditex says it doesn't publish its factory list for commercial reasons, but we have to move beyond that line of thinking. If H&M, Adidas, Nike and Levi's can do it and remain profitable then other companies can too. This is an important first step to ensure that brands are accountable to their stakeholders and to their customers – those asking **#whomademyclothes** now number in the millions.

Overall, every brand should be doing more to communicate with the public about their strategies and performance on social and environmental issues throughout the supply chain. But the luxury brands are the biggest laggards; most publish nothing more than a Code of Conduct.

Going forward Fashion Revolution will encourage brands to publish more details about the suppliers they work with, and we will celebrate them when they do.

We would also like to see brands put in place sustainability strategies, covering both social and environmental improvements, with clearer long-term goals that include timelines, quantifiable targets and an explicit commitment towards greater transparency. This shows that brands are serious about doing more for the people who make their products.

**Going forward Fashion Revolution will encourage brands to publish more details about the suppliers they work with, and we will celebrate them when they do.**

# GET INVOLVED

*This Index is a living document and is open to comments and contributions from researchers, NGOs and unions.*

We also invite the 40 companies scored in this Index to provide further information in order to update their score. Where companies did not respond to our questionnaire, we were only able to assign marks based on the information we could find on the company's website or publicly available elsewhere. As such, the scoring is likely to evolve over time when new information becomes available.

We further invite brands and retailers over £36 million annual turnover to volunteer to be included in future editions of the Fashion Transparency Index. **Next year we aim to include 100 brands and retailers in this Index.**

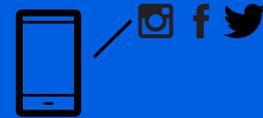
If you are a consumer and would like to see another brand on the Fashion Transparency Index, let them know on social media or write to them. Don't forget to use the hashtag **#whomademyclothes**.



## SHOW YOUR LABEL



## ASK THE BRAND #WHOMADEMYCLOTHES?



# REFERENCE & APPENDIX

To see the full methodology and research behind the scores, please visit:

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

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# ABOUT THIS REPORT

*This research was  
designed by Ethical  
Consumer in partnership  
with Fashion Revolution.*

The research was carried out by Bryony Moore, Ethical Consumer research associate, with additional input from Tim Hunt (Ethical Consumer) and Sarah Ditty (Fashion Revolution).

This report was co-written by Bryony Moore at Ethical Consumer and Sarah Ditty; and designed by Heather Knight. Thanks for further input from Carry Somers at Fashion Revolution and the entire Fashion Revolution Global Coordination Team.



**FASHION REVOLUTION** is a global movement that wants 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 89 countries that want to see fashion become a force for good.

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