

ACCOUNTABLE

ASSESSMENT

ABLE

NASHVILLE, TN

ACCOUNT**ABLE** is a reporting system that provides unprecedented transparency into the social impact of employment and manufacturing practices, particularly the impact on women.

Independent auditors are sent to assess a company, and this report is the outcome of both the initial assessment and the 90-day corrective action period following.

Hello,

A couple years ago, we began looking for ways to quantify the impact of our manufacturing. How many jobs are we creating? Are the workers impacted by our business thriving, or merely surviving? How is our business doing in terms of providing a long-term change in someone's life and enabling them to break a cycle of generational poverty?

We searched (and searched) for thorough assessments or certification programs that would prove the impact we've seen our business have in manufacturing communities abroad and at home. After searching for more than a year, there were two things missing that we wanted for auditing ourselves: 1) a level of transparency that published everything pertinent to what we felt empowered consumers, and 2) creating an audit that really focused on women and had thorough, on-site employee interviews.

So we decided to create the type of social impact measurement platform that we had hoped to find. That is how ACCOUNTABLE was born.

We hired two brilliant consultants, who had previously consulted major Fortune 500 companies, and worked with them to detail the content and process for a new type of social impact assessment. The ACCOUNTABLE assessment includes personal interviews, anonymous surveys, and double verification of company claims. It focuses on safety, equality and wages.

Our vision for ACCOUNTABLE is much bigger than our own brand, ABLE. We hope this becomes an asset to the global manufacturing community and a solution for brands like us, working to measure and implement change. We want ACCOUNTABLE to lead, first and foremost, in a new standard of transparency.

Because at the end of the day: wouldn't it be great to have a 'nutrition label' on our consumer goods, scoring safety, equality and wages? Wouldn't it be a relief to know what your money is going toward before you ever swipe your credit card?

We hope you'll join us on our journey towards more transparent manufacturing; this report is the first step!

Best,



Barrett Ward

Included in this report, you will find:

- A brief overview of the audited company
- An executive summary giving a high-level overview of company findings
- Overview of corrective actions
- Detailed scoring information, showing specific line-item scores contributing to the total
- Appendix:
 - Verification options
 - Details of score calculations
 - Description of corrective action period
 - Questions for future audits

MANUFACTURER PROFILE

Location:

NASHVILLE, TN

Products:

**JEWELRY MANUFACTURING
AND FULFILLMENT**

Owner:

ABLE

Established:

2014

Employees:

58

56 WOMEN, 2 MEN

ABLE's mission is to end generational poverty by providing economic opportunity for women.

ABOUT ABLE:

ABLE was founded in 2010 and has grown from a single collection of hand-woven scarves to a one-stop shop for ethical fashion, offering leather goods, handmade jewelry, denim, clothing and footwear.

ABLE opened the Nashville manufacturing location when they acquired the jewelry line in 2015, and opened the flagship store in 2016.

INDEPENDENT AUDIT PERFORMED BY:

Divya Kapasi and Richard Demato; GoodOps, Inc

ABLE'S IMPACT:

ABLE is committed to protecting and empowering women in the workplace. They actively hire from marginalized communities, working with women who have often overcome extraordinary circumstances, because we know that when women thrive, so do the economies and communities around them.

JEWELRY MANUFACTURING:

After a successful expansion into leather bags and accessories, ABLE acquired a local jewelry company actively hiring women out of rehabilitation programs and homeless shelters to provide them with employment and a transferable, professional skill set. They also hire certified bench jewelers, who help train new hires.

FULFILLMENT:

ABLE recognized an opportunity to create jobs for women in their local community by bringing order fulfillment in-house. As a result, the fulfillment department hires both locally out of rehabilitation programs and homeless shelters, as well as industry experts who oversee training, processes and development.

ACCOUNTABLE Report	
ABLE, Inc. Nashville, TN	
Lowest Wage¹	\$14.00/hour
% of living Wage	126%
Nashville Minimum Wage	\$7.25/hour
Nashville Living Wage ²	\$11.24/hour
Scores³	
Equality	94.1%
Safety	81.3%
Wages	89.6%
Overall Score	90.6%
<small>¹If the published wage is an average wage or general labor cost, it does not reveal the lowest paid worker's wage. ²Data from MIT Living Wage Calculator ³Informed by on-site audits, employee interviews and verified company documents</small>	

STRENGTHS:

- All employees are paid above a living wage.
- There's a strong focus on empowering women across all areas/stages of the value chain.
- ABLE actively hires from vulnerable communities
- Positive working environment at brand headquarters with a strong culture and high regard for company leadership; brand employees are generally very happy and feel supported.

WEAKNESSES:

- Need to increase safety for jewelry manufacturers by improving facilities and dress codes.
- Need to create a formal and safe process for employees to report issues.
- Some employees expressed the need for more clear roles and allocation of responsibilities to reduce stress and high work hours
- Company has gaps in the extended supply chain assessment with potential undocumented risks upstream with second and third tier suppliers
- Need to normalize social impact goals, targets and create an impact report to share with suppliers and customers

CORRECTIVE ACTIONS TAKEN:

- Various safety equipment was implemented, including ventilation at soldering stations, vacuum systems for any airborne risk while drilling, and eye-washing stations.
- Policies and procedures were put in place to ensure safety, such as: training on soldering fuel, safe dress policies including aprons while soldering, closed-toed shoes and hair pulled back
- Certified bench jewelers and metalsmiths were hired to speak into safety processes and educate the team.
- All production employees now meet with their supervisor twice a month and their supervisor's manager quarterly.

METRIC	0	1	2	3
<p>Employees (not including owners) are paid a livable wage for an individual living in Nashville, TN (base salary, not including overtime). This wage is calculated at \$1,892/month, based on the following:*</p> <p>Annual Expenses</p> <ul style="list-style-type: none"> - Food: \$2,983 - Child Care: \$0 - Medical: \$2,186 - Housing: \$7,932 - Transportation: \$4,401 - Other: \$2,458 - Required annual income after taxes: \$19,960 - Annual taxes: \$2,743 - Required annual income before taxes: \$22,702 <p>*Glasmeier, A.K. (2017). "Living Wage Calculation for Davidson County, Tennessee." Retrieved from http://livingwage.mit.edu/counties/47037</p>	<p>Company is paying < 25% of Livable Wage target (including Overtime)</p>	<p>Company is paying 26% - 70% of Livable Wage target (including Overtime)</p>	<p>Company is paying 71% - 99% of Livable Wage target (including Overtime)</p>	<p>Company is paying 100% of Livable Wage target (including Overtime)</p>
<p>Employees do not need to work more than one job or overtime to pay for living expenses</p>	<p>76-100% of employees need to work more than one job / work overtime</p>	<p>26-75% of employees need to work more than one job / work overtime</p>	<p>1-25% of employees need to work more than one job / work overtime</p>	<p>0% of employees need to work more than one job / work overtime</p>
<p>Employees do not need their children or younger siblings to work in order to help pay living expenses</p>	<p>76-100% of employees children/ siblings need to work</p>	<p>26-75% of employees children/ siblings need to work</p>	<p>1-25% of employees children/ siblings need to work</p>	<p>0% of employees children/ siblings need to work</p>

METRIC	0	1	2	3
Employers officially pays all legally required deductions (e.g. pension, income tax)	< 100% of all employees	n/a	n/a	100% of all employees
Employees receive base pay and overtime in a timely manner and are not subject to unclear withholdings	< 100% of all employees	n/a	n/a	100% of all employees
Employees have a dual signature, written employment contract (Incl. name, address, age, work card number, employment type, workplace, wage rate, calculation method, wage payment, interval, duration)	0-50% of all employees	50-74% of all employees	75-99% of all employees	100% of all employees
Paying at least Minimum Wage	No			Yes

METRIC	0	1	2	3
Full time, permanent employees, work a maximum of 8 hours a day and 40 hours per week, at regular pay	< 100% of all employees	n/a	n/a	100% of all employees
+ Office is accessible by public transportation and a majority of employees (FT) have under 1 hour commute	< 51% of all employees	51% of all employees	52-79% of all employees	80-100% of all employees
+ Employees (FT) can choose flexible working hours as needed (e.g. child-care, parental care, medical, etc)	Not offered	FT management team only	All FT (only if applicable)	All FT & PT (only if applicable)
+ Employees (FT) have the flexibility and option to work from home	Not offered	FT management team only	All FT (only if applicable)	All FT & PT (only if applicable)

+ denotes a bonus question

METRIC	0	1	2	3
Employer offers an official Maternity Leave policy (Legal requirement: 90 days maternity leave with full pay)	Does not offer / have an official policy	Offering policy but below legal requirements	Offering policy that meets legal requirements	Offering policy that goes above legal requirements
Employer offers professional and/or accredited training to grow employee skill sets	Offered to <10% of employees	Offered to 10-25% of employees	Offered to 26-75% of employees	Offered to 76-100% of employees
Employer has not attempted to restrict an employee union and/or freedom of collective bargaining	Does not allow; restricted	Allows, but discourages	Allows (formal or informal)	Supports (formal or informal)
+ Employer offers a 401K or other savings program to employees.	No 401K or other savings program offered to employees.	Employer recommends employees open independent 401K or other savings account, and provides educational resources on the subject.	Employer offers a 401K or other savings program to employees.	Employer offers a 401K or other savings program to employees and matches a certain percentage of employees salary in deposits.
+ Employer offers a basic medical allowance (not mandated by government)	None	Ad Hoc Only	Guaranteed Check-up	Official Healthcare coverage/ policy
+ Employer offers a transportation allowance (in addition to reimbursement for work related travel)	No			Yes
+ Employer offers a mobile allowance (in addition to reimbursement for work related communication)	No			Yes

+ denotes a bonus question

METRIC	0	1	2	3
Employer is an active employer of women	< 40%	40-49% are women	50-75% are women	76-100% are women
Women are equally represented in leadership roles compared to men (e.g. Manager, Supervisor, Director, Vice President, etc)	< 25% representation	25%-49% representaiton	50% (or equal) representation	Greater than 50% representation
Women are given the same opportunity for promotion as men	0% of employees feel equal opportunity	0-25% of employees feel equal opportunity	26-75% of employees feel equal opportunity	76-100% of employees feel equal opportunity
+ Vision/mission statement of the company specifically includes employment and empowerment of women	Not part of mission	Verbally communicated	Stated in company materials (e.g. Handbook, website, etc.)	Target goals established and tracked
+ Women are provided career support and coaching	Not encouraged	Encouraged informally	Encouraged formally through company materials/policies	Women are actively coached and supported by a designated mentor
+ Female ownership (part of full) of the company	No female owners			1 or more female owners

+ denotes a bonus question

	METRIC	0	1	2	3
	Company is an equal opportunity employer and does not discriminate based on race, color, religion, creed, sex, national origin, age, disability, marital status, or any other status protected by applicable law	Complaints against employer			No complaints against employer
+	Employer actively hires from vulnerable communities (e.g. HIV/AIDS, refugees, homeless, blind, etc.)	No			Yes
+	Employer states the benefit and positive impact in giving jobs to vulnerable communities.	Not part of mission	Verbally communicated	Stated in company materials (e.g. Handbook, website, etc.)	Target goals established and tracked

+ denotes a bonus question

METRIC	0	1	2	3
Employer offers full time, permanent work for tasks of permanent nature	< 50% are full time employees	50%-75% are full time employees	76-90% are full time employees	> 90% are full time employees
Employer has more full time women workers than part time women workers	Zero FT women	Number of FT women < Number of PT women	Number of FT women = Number of PT women	Number of FT women > Number of PT women
Employer hires majority of their part time, temporary staff from holiday/peak season	Zero PT staff is hired	< 25% of PT staff is hired	26-75% of PT staff is hired	76-100% of PT staff is hired
+ Employer offers part time employees the same benefits as permanent workers	No benefits given	At least one benefit given (e.g. pension matching, healthcare, paid maternity leave, paid sick leave)	Two benefits given (e.g. pension matching, healthcare, paid maternity leave, paid sick leave)	More than two benefits given (e.g. pension matching, healthcare, paid maternity leave, paid sick leave) *with part-time defined as 32+ hrs/wk

+ denotes a bonus question

METRIC	0	1	2	3
Employees are all above the age of 14: no child labor exists	Employees under the age of 14	Some employees are age 14-18	No employee is under the age of 14	No employee is under the age of 18
Employer has sufficient and rigorous safety checks to ensure no child under age 14 is employed	No process	Checks all employees identification card to confirm birth date	Requests a second form of identification (e.g. passport) to confirm birth date	Verifies identification of employees with government resources
Employer knows the child labor policies of their suppliers with proof of responsible business practices	Not aware	Verbal discussion with supplier on their policies	Written confirmation from supplier on their policies	Validated confirmation from supplier on their policies
+ Employer communicates their policy of no child labor to employees; employees know where to report illegal employment or exploitation of children	Nothing stated	Verbally Communicated	Written policy communicated in handbook	Education and training provided to employees on how to report child labor
+ Employer offers additional education to employees between the ages of 15-18 (if applicable)	No education offered	Informal education offered with clear outcomes for success	Formal education offered with clear outcomes for success	Employee earns some form of school credit for education received

+ denotes a bonus question

METRIC	0	1	2	3
Employees are not in debt to the employer or held to their job through manipulated debt	At least one employee is in debt or held to their job (*not a cash advance)			No employee is in debt or held to their job
Employees are free from forced labor / modern day slavery (*Definition: work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities)	No			Yes
Employees feel exploited or under the menace of penalty, BUT they can quit the job if they want (exploitation not slavery)	4 or more employee accounts of coercion, intimidation, manipulation or threats	2-3 employee accounts of coercion, intimidation, manipulation or threats	No more than 1 account of coercion, intimidation, manipulation or threats	No employee account of coercion, intimidation, manipulation or threats
Employees can leave work for emergencies without fear of losing their jobs	Less than 10% said yes	Between 10%-80% said yes	Between 81- 99% said yes	100% said yes
Employer knows the forced labor policies of their suppliers with proof of responsible business practices	Not aware	Verbal discussion with supplier on their policies	Written confirmation from supplier on their policies	Validated confirmation from supplier on their policies
+ Employees know where to report forced or exploitative labor practices	Not aware	Name of organization provided	Organization contact information provided (address, telephone number, email, website)	Designated office or representative at organization established

+ denotes a bonus question

METRIC	0	1	2	3
<p>Employees have a handbook with clearly defined legal rights and company policies</p>	<p>No handbook</p>	<p>Handbook detailing all legal rights</p>	<p>Handbook detailing legal rights + all non-legally required company policies</p>	<p>Employees receive official training/ orientation on handbook with ongoing/ annual updates</p>
<p>Employer provides all current/ relevant safety equipment and requires workers to wear/use them (e.g. gloves, masks)</p>	<p>No safety equipment is provided or required</p>	<p>Some safety equipment provided free of charge to workers but not comprehensive and not required to use them</p>	<p>All necessary safety equipment provided free of charge to workers but not required to use them</p>	<p>All necessary safety equipment provided free of charge to workers and they're required to use them</p>
<p>Employer properly handles hazardous and toxic chemicals to ensure worker safety.</p>	<p>No safety protocols have been considered or developed</p>	<p>Some legal/ necessary safety protocols in place</p>	<p>Some legal/ necessary safety protocols are in place and documented for employees</p>	<p>All legal/ necessary safety protocols are documented and active</p>

METRIC	0	1	2	3
Employer provides a working environment where workers feel safe from injury	< 25% feel safe from injury	25-50% feel safe from injury	51-99% feel safe from injury	100% feel safe from injury
Employees feel safe from physical or emotional harassment at work	Employees have expressed they don't feel safe			All employees have expressed they feel safe
Employees feel safe in the workplace during work hours and arriving/ departing from the office	0-24% feel safe	25-74% feel safe	75-99% feel safe	100% feel safe
Employees feel safe to report a crime or incident	0-24% feel safe to report	25-74% feel safe to report	75-99% feel safe to report	100% feel safe to report
+ Employer has an official policy of offering women a taxi (or other safe transport) to return to their homes if they work past 8pm	No			Yes

+ denotes a bonus question

VERIFICATION OPTIONS

EMPLOYEE

- Survey (signed)
- Employee Agreement (signed)
- Formal Letters (signed)
- Bank Statements (official)
- Purchasing Receipts
- Rental Statements
- Etc.

DOCUMENTS

- Employee Handbook/Written Policy
- Employer Written Commitments (signed)
- Bank Statements (official)
- Safety and/or Crime reports (signed)
- Medical Receipts
- Transportation Receipts
- Mobile Phone Receipts
- Human Resources role (internal/3rd party)
- Etc.

SCORING DETAILS:

- The overall weighted score is 25% livable wage, and the remaining 75% is calculated as follows:
(Total points earned both bonus and core) / (Total points possible for core + bonus points earned)
- Each score can have a minimum of 0 and a maximum of 3
- Each metric score is valid only if the necessary validation is provided
- New questions were added after in-person assessment, you can find these on the “Questions to ask for Future Audits” page (p.19)
- Bonus points are available for social impact practices that exceed expectations

WHAT IS A CORRECTIVE ACTION PERIOD?

Once results of the initial assessment are accepted, the company creates a corrective action plan of prioritized changes to make, and outlines timeframes in which those changes must be accomplished. Once the corrective action plan is confirmed, the corrective action period begins. The majority of committed actions must be completed within 90 days (3 months), with a grace period of 6 months to be granted on a case-by-case basis. Each metric impacted by corrective actions requires specified validation before receiving an adjusted score.

Note: The assessments you’re seeing are already adjusted for corrective actions that have been implemented and verified.

Questions to ask for Future Audits:

Throughout this first assessment and the learning process that entailed, there have been topics added for any future assessments. These topics include:

- Employees are paid overtime according to local law
- Employer observes legal requirements for public holiday pay for all employees
 - ◊ An employer is only required to pay hourly employees for time actually worked. On the other hand, exempt employees (salaried employees who do not receive overtime), who are given the day off, must be paid their full weekly salary if they work any hours during the week in which the holiday falls.
- Employer offers an official/legal Sick Leave policy
- Employer offers an official/legal Annual Leave policy
- Women are paid the same as men for the same position
- Vulnerable employees are paid the same wages as non-vulnerable employees
- Employer offers all jobs, including management positions, to vulnerable communities
- Employer takes proper precautions to prevent fire
- Women feel safe from sexual harassment going to, being at and leaving from work
- Women are not allowed in types of work that are particularly arduous or harmful to women's health
- Employees have been given formal safety training (e.g. machinery, workplace, emergencies)

