Linguistic Issues of Transparency in the Fashion Transparency Index

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Keywords	Abstract
Transparent communication Language of transparency Language of sustainability Fashion Revolution Fashion Transparency Index	The *Fashion Transparency Index* (FTI) is a very sophisticated operationalisation of the notion of transparency in the field of fashion: since 2016 the Index has scored annually the degree of transparency of the world's largest brands in their sustainability-related efforts. Like previous work on transparency, the Index also contains occasional remarks on the language used by brands. Given the key role played by language in transparent, i.e., honest, open and clear, communication, it is surprising that such remarks have not been systematically investigated. The present study aims to fill, albeit partially, this research gap. First, a diachronic content analysis was conducted on the FTI (2016-2023) to identify the issues regarding the language used by brands when disclosing their sustainability-related efforts, as seen from the perspective of the non-linguistic community of the compilers of the Index as well as from a linguistic perspective. Second, a frame analysis was conducted on the use of *encourage* and *suggest* – which the Index associates with lack of transparency when used by brands in their disclosure of supply chain policies – to ascertain whether these verbs, along with other conceptually related ones, may hinder transparency. Results show that linguistic remarks in the FTI are often unsubstantiated and, overall, reveal a lack of generic and contextual awareness. While this is unsurprising, since the compilers of the FTI are not linguists, the findings clearly point to a need for cooperation between the non-linguistic community of the FTI authors' and linguists, if the Index aims, as it claims, "to closely scrutinise the language used" by brands (FTI 2020, 5) and design guidelines which brands can use.

1. Introduction[1]

"Why transparency is the beginning of a fashion revolution," the opening chapter of the first edition (2016, 2-4) of The *Fashion Transparency Index* (henceforth, FTI or Index), opens with a mention of the collapse of the Rana Plaza building in Bangladesh in 2013, where 1,134 people

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[1] Although the authors have collaborated closely on the paper, Costanza Cucchi is responsible for Sections 2.2, 3, 5.1, 6.1, while Sonia Piotti is responsible for 2.1, 4, 5.2, 6.2. Sections 1, 5, and 7 were written together.

died. In the building, various factories made clothes for over a dozen international companies. However, "[i]t took weeks for some companies to determine whether they had contracts with those factories" (FTI 2016, 2). The terrible accident drew attention to the opaqueness of fashion supply chains and to the social and environmental costs of the fashion industry (Ospital et al. 2023; Mukherjee 2015).

Fashion Revolution, "a global movement that wants to radically change the way fashion is made, sourced and consumed," (FTI 2016, 19) and Ethical Consumer, "a research co-operative with a mission to make business more sustainable through consumer action" (FTI 2016, 19), claimed that the first step to prevent disasters like the Rana Plaza from happening again was transparency (FTI 2016, 2), i.e., the public disclosure by brands in sustainability-related areas. For this purpose, the two organisations devised the FTI, whose publication was taken over by Fashion Revolution in 2017 and reached its eighth edition in 2023.

The FTI is intended as a tool to assess, through a rating system, brands' commitment to sustainability, based on their public disclosure on their websites and annual reports, two crucial genres for communication with stakeholders. The annual publication of the Index involves a collaborative effort by activists, researchers, industry experts, NGOs, and corporate partners with the aim of encouraging brands to improve their practices and to accurately communicate them. To ensure that such communication is fully understandable and effective, language plays a crucial role. Although there are studies on the lexicon of sustainable fashion – by fashion scholars (Henninger, Alevizou and Oates 2016; Blanco-Velo 2010; Thomas 2008), fashion professionals (*The New Standard Institute*) and linguists (Karpova 2023; Belova 2022; Cucchi and Piotti 2016) – there is no systematic study of the language used by brands to disclose their commitments to sustainability. The FTI does contain occasional linguistic remarks, which the present study aims to investigate. More specifically, the research questions are as follows:

1. What type of linguistic remarks are expressed in the FTI and how are they expressed?
2. Do these remarks change over time and, if so, how?
3. Do *encourage* and *suggest*, as used in policies disclosing the sustainability commitments which brands require of their supply chain, really hinder transparency, as claimed by the FTI?
4. Are there other verbs, which were not identified by the FTI researchers, but equally hinder transparency?

The paper is divided in seven Sections. Section 2 provides background information on current interpretations of corporate transparency and its applications within the fashion industry, while Section 3 outlines the key aspects of the FTI. The corpus and the methodology are illustrated in

Section 4. Section 5 is dedicated to the analysis, respectively of the linguistic remarks in the Index (Section 5.1) and of the use of *encourage* and *suggest* and of other related verbs (Section 5.2). The results are discussed in Section 6, while Section 7 presents concluding remarks.

2. Background: transparency and its application in the fashion industry

2.1 Transparency

The concept of transparency has evolved significantly across time. Its roots are in the Enlightenment Era, when the concept was commonly associated with governance and signified the clear and open conduct of public officials and institutions as a means to fight corruption and enhance democratic processes (Florini 2007). Since the 20th century, transparency, driven by the rise of consumer rights movements (Hess 2007), the increasing complexity of global markets, and a series of corporate scandals, has evolved into a central element of modern corporate discourse. In this context, it is a multifaceted notion encompassing various aspects such as ethics, sustainability, disclosure, traceability, accountability, honesty and clarity in social responsibility and corporate governance.

Transparency currently has a key role as a strategic asset to enhance corporate reputation and trust (Crane and Glozer 2016; Freeman 2010) as well as to drive long-term value creation.

2.2 Transparency in the fashion industry

It was in 2016, with the publication of the first edition of the FTI, that the interest in transparency, "roughly [...] defined as disclosure of information" (Egels-Zandén, Hulthén and Wulff 2015, 95), "became codified" in the fashion industry (Richards 2021, 915). However, the FTI was not alone in its effort to operationalise the concept of transparency and to assess the brands accordingly. Being initially restricted to corporate practices, in forms such as sustainability reports, sustainability certifications, and environmental product declarations, the concept of transparency was then extended to supply chain transparency, which, however, was "inconsistently defined" (Egels-Zandén, Hulthén and Wulff 2015, 95), as confirmed by the fact that different authors interpreted the concept in different ways. For example, suggesting that supply chain transparency may be considered as "an umbrella term," Egels-Zandén, Hulthén and Wulff (2015, 96) broke down the notion into three dimensions, i.e., "the names of the suppliers involved in producing the firm's products (i.e., traceability), information about the sustainability conditions at these suppliers, and the buying firms' purchasing practices." Instead, James and Montgomery (2017), which aimed to ascertain which dimensions of transparency consumers found more valuable, devised a multiple-choice questionnaire where supply chain transparency was broken down into more components. In order of their relative

importance, the following were found to be more valuable by consumers: supplier ethical standards, retailer code of conduct, minimum wages, freedom of association, audit process details, and factory lists.

Various studies indicated that transparency is a matter of degree and that its dimensions are unrelated. Egels-Zandén, Hulthén and Wulff (2015) and Egels-Zandén and Hansson (2016) claimed that, along each dimension, companies may be transparent to various extents, for example by disclosing the names of just first-tier suppliers or the sustainability conditions for some suppliers without disclosing their names. The idea that transparency cannot be dualistically framed (Egels-Zandén, Hulthén and Wulff 2015, 95) as being either present or absent in each company was confirmed in James and Montgomery (2017), which relied on a three-degree colour code, corresponding to little, medium and good amount of information, to rate the information provided by five selected companies. The 2019 State of Fashion report even introduced the concept of 'radical transparency'. Covering various aspects such as "creative integrity, sustainable supply chains, value for money, treatment of workers, data protection and authenticity," radical transparency was one of the trends of the year 2019 and responded to the rising "trust deficit" by consumers (BoF and McKinsey & Co. 2019, 60). However, by mentioning brands which were transparent in specific areas, for example where products were made or the environmental impacts of each garment they sold, the report implied that radical transparency remained an ideal goal. Richards's (2021) case-study on three companies confirmed that each of them had a different interpretation of the notion of transparency and that transparency is a matter of degree–radical transparency, intended as "sweeping, drastic and *comprehensive*" [emphasis in the original] (Richards 2021, 915), being unattainable.

Another aspect of the disclosure of sustainability-related information is its formats and channels. James and Montgomery (2017) found, through consumers' questionnaires, that the following were preferred by consumers, in order of frequency: text and imagery, icons, film footage, colour-coding, text-only. Their case-study revealed that a half of the companies in their sample conveyed information through images, videos and narrative, while the other half relied on text. Richards (2021) found that companies relied on various channels, such as a production guide available on the corporate website or the story of each garment published on the corporate website and on social media.

A further aspect is the language used by companies to disclose sustainability-related information. The observations made in the literature appear rather general and repetitive. James and Montgomery (2017, 296) noted that, when companies relied on text, information was disclosed through "large, word heavy text documents which consumers may have found difficult to follow due to lots of jargon." Both Egels-Zandén and Hansson (2016, 390), and Richards (2021, 922) claimed that the audit information disclosed by brands was often "nearly impossible for

consumers to understand [...] (unless they themselves are experienced sustainability auditors in the garment industry)." They also claimed that sustainability information was "often voluminous, vague, and presented in an inaccessible technical vocabulary, making it difficult for consumers to engage with the information" (Egels-Zandén and Hansson 2016, 390) and "often vague, complicated or confusing" (Richards 2021, 922).

3. Key aspects of the Fashion Transparency Index (2016–2023)

Since 2016, the FTI Index has scored annually the amount and type of sustainability-related information disclosed by brands, whose number was steadily increased, from 40 in 2016 to 250 in 2020, the current number. In order to be able to score the transparency of the brands, the Index also had to operationalise the concept of transparency, establishing its areas.[2] In 2016, the concept was broken down into the following areas: Policy and Commitments, Tracking and Traceability, Audits and Remediation, Engagement and Collaboration and Governance. In 2017, three areas were renamed, remaining currently unchanged: Tracking and Traceability became Traceability, Audits and Remediation became Know, Show & Fix, while Engagement and Collaboration was changed into Spotlight Issues. Spotlight Issues are selected every year based on their relevance for the fashion industry, e.g., living wages, unionisation, overconsumption, climate change and biodiversity.

Every year, Fashion Revolution researchers identify specific indicators for each area and scan the brands' websites and annual reports to verify whether a specific piece of information is provided. Based on this, researchers award points. Given that information is at times very difficult to locate, the brands are sent a questionnaire to assist researchers in locating the relevant information. At this stage, final points are awarded. Since the linguistic remarks examined in Section 5.1 are made by Fashion Revolution researchers based on this task, it is deemed important to understand what type of information they typically look for in brands' websites and reports with reference to the five areas mentioned above. Policy and Commitments refers to the goals and standards regarding workers and the environment: indicators are the publication of policies on a variety of issues, such as Animal Welfare, Corruption & Presentation of False Information, Biodiversity, Foreign & Migrant Labour, Recruitment & Terms of Employment, Use of Chemicals, Water Usage, Working Hours (FTI 2017, 27). Regarding Governance, it is rated, for example, whether the contact details of the people responsible for sustainability are disclosed and whether staff incentives linked to improvements in human rights and environmental performance are published (FTI 2017, 34). With reference to

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[2] The word 'area' is used in the FTI to refer to a single component of transparency, thus corresponding to what Egels-Zandén, Hulthén and Wulff (2015) call a 'dimension' of transparency.

Traceability, the issues considered are, for example, whether supplier lists are published and whether they comprise the facility address, contact details and types of products made (FTI 2017, 38). Regarding Show & Fix, points are given, for example, to whether information about the supplier assessment process is disclosed and whether the number of supplier assessments, both announced in advance and surprise visits, is specified (FTI 2017, 42). As can be seen from these examples, the type of information which researchers look for in brands' texts is extremely specific. Moreover, new indicators are added every year: while the number of indicators was not mentioned in the first editions of the FTI (2016-2018), there were 202 indicators in 2019, 220 in 2020, 239 in 2021, 246 in 2022, and 258 in 2023 (FTI 2023, 5; FTI 2022, 3; FTI 2021, 3; FTI 2020, 12; FTI 2019, 23). This clearly points to an increasingly comprehensive concept of transparency, thus approaching to the idea of 'radical transparency' (BoF and McKinsey & Co. 2019) and reveals an attempt to urge companies to steadily improve their transparency. Not only new indicators were added every year, also the methodology underwent specific changes. For example, since FTI researchers noted that brands generally published more information on their policies than in other areas, the maximum number of points for this area was halved in FTI 2021, so as to stimulate disclosure in other areas (FTI 2023, 41; FTI 2022, 35; FTI 2021, 5).

4. Corpus and methodology

To investigate research questions 1. What type of linguistic remarks are expressed in the FTI and how are they expressed?; and 2. Do these remarks change over time and, if so, how?, a corpus of the eight editions of the FTI (2016-2023) was created by downloading the pdf documents (2017-2023) from the Fashion Revolution website.[3] A manual content analysis of the remarks on language was carried out to identify what they meant from a linguistic perspective. The remarks were then compared diachronically to identify any changes.

To investigate research questions 3. Do *encourage* and *suggest* as used in policies disclosing the sustainability commitments which brands require of their supply chain, really hinder transparency, as claimed by the FTI?; and 4. Are there other verbs, which were not identified by the FTI researchers, but equally hinder transparency?, a corpus of the above-mentioned policies by *H&M* and *Primark* was compiled, containing a total of nine documents. The two companies were chosen since they represent the same mass-market sector but H&M scores very

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[3] The 2017-2023 editions were downloaded from the archives of the Fashion Revolution website (https://www.fashionrevolution.org/fashion-transparency-index/). The 2016 edition, which resulted from the cooperative efforts by Ethical Consumer and Fashion revolution, was not linked to the website and was therefore downloaded from https://fashionrevolution.org/wp-content/uploads/2016/04/FR_Fashion TransparencyIndex.pdf. All websites were last visited on 24/04/2024.

high in the FTI, while Primark has a medium score. The policies were downloaded from the brands' websites.[4] Table 1 provides the relevant information.

Company	Type of policy	Year	Aim	Tokens (LancsBox 6.0) Total: 36,675
H&M	Sustainability Commitment (pdf)	2016	To detail the expectations and requirements to ensure ethical, transparent, and responsible practices in the supply chain and maintain a business relationship with H&M.	3,699
H&M	Sustainability Commitment (pdf)	2022	To improve social and environmental sustainability in the supply chain based on internationally recognised standards.	5,317
H&M	Guidelines for Home Workers (pdf)	2023	To ensure ethical homework practices and protect homeworkers' rights in the supply chain.	2,184
H&M	Responsible Recruitment of Migrant Workers (pdf)	2023	To protect the right and dignity of migrant workers in the supply chain based on International Labour Organization conventions and principles.	2,308
H&M	Sustainability Impact Partnership Program (SIPP) (webpage)	n.d.	To assess suppliers' compliance with Sustainability Commitment based on measurable time-bound social and environmental levels of performance	478
Primark	Modern Slavery Statement (pdf)	2021	To ensure that Primark's commitment to ethical trade and human rights is respected in the supply chain.	16,700
Primark	Wood and Wood-derived Fibre Policy (pdf)	2022	To ensure that all wood and wood-derived products are sourced legally and sustainably in the supply chain.	1,598
Primark	Supply Chain Human Rights Policy (pdf)	2023	To promote human rights in the supply chain.	2,517
Primark	Supplier Code of Conduct (pdf)	2023	To ensure that workers in Primark's supply chain have good working conditions and that their rights are respected.	1,874

Tab. 1: Corpus for the present analysis

A frame analysis of *encourage*, *suggest* and other verbs as used in the policies was carried out through *FrameNet*, a "lexical database of English that is both human-and machine-readable, based on annotating examples of how words are used in actual texts."[5] Based on Fillmore's Frame Semantics (1992; 1985; 1982; 1976), FrameNet shows how words receive meaning through conceptual "frames," i.e., stereotypical situations, actions, events, states which they evoke in the mind of the intended audience. Frames interact and overlap with each other through various relationships which help language users organise the network of frames and

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[4] H&M's policies were downloaded from the area "Our Business Partners" on the brand's website available at https://hmgroup.com/sustainability/standards-and-policies/. Primark's policies were downloaded from the company's corporate website at the following URL: https://corporate.primark.com/en-gb/policies-and-reports/policies.

[5] https://framenet.icsi.berkeley.edu/about.

understand how different actions, situations, states, or events relate to one another within the lexicon and in the broader context of human experience. Each frame in FrameNet includes a frame definition, i.e., the description of the scenario or action; Frame Elements (FEs), i.e., the participants and objects involved; and frame relationships. The semantic features of two or more conceptually related verbs, for example *encourage* and *suggest*, may foreground different aspects of and assumptions about the same background frame: as argued by Fillmore (1982, 125) "the same 'facts' can be presented within different framings, which make them out as different 'facts.'" For example, *thrifty* and *stingy* describe the same scene/fact, corresponding to the cognitive frame "anti-spending behaviour," but make different assumptions about values, i.e., *thrifty* assumes that saving money is admirable and wasting it is negative, whereas *stingy* assumes that spending money can be beneficial and saving it can be a negative trait.

For this part of the analysis, H&M's and Primark's policies were first scrutinised to identify occurrences of *encourage* and *suggest* using LancsBox 6.0 (Brezina, Weill-Tessier and McEnery 2021). When occurrences were found, a frame analysis was performed as follows.

Step one: the two verbs were looked up in the FrameNet database to identify the semantic frame(s) that each verb evokes.

Step two: each sentence containing these verbs was manually annotated with the frames as well as FEs related to each verb as identified in FrameNet.

Step three: the frames and FEs were manually analysed to identify the relationships between different frames.

Second, the policies were scrutinised to identify verbs other than *encourage* and *suggest*. When occurrences were found, the three-step frame analysis described above was applied to these verbs as well.

5. Analysis

Section 5.1 investigates research questions 1. and 2.:

1. What type of linguistic remarks are expressed in the FTI and how are they expressed?

2. Do these remarks change over time and, if so, how?

Section 5.2 investigates research questions 3. and 4.:

3. Do *encourage* and *suggest*, as used in policies disclosing the sustainability commitments which brands require of their supply chain, really hinder transparency, as claimed by the FTI?

4. Are there other verbs, which were not identified by the FTI researchers, but equally hinder transparency?

5.1 Linguistic remarks in the FTI (2016–2023)

Over the years, the FTI has made comments on the language used by companies when disclosing their sustainability efforts. The earliest remarks on language are in the 2017 edition of the Index, which devoted three paragraphs to this issue. The first paragraph (1), entitled *Information is hard to find*, refers to the task of finding the specific information which researchers were looking for to score the brands. The sentence "Information is often found many clicks away from the homepage of brands' websites" fails to consider that website writers may well put persuasive or entertaining information on the first webpages so as to attract visitors. Similarly, microsites may house information which is considered too specific to be put on the main website.

(1)   This research was a long and rather arduous process. If you wanted to find out exactly what brands are doing and how they are performing on social and environmental issues, it is difficult — sometimes entirely impossible — to find this information. *Information is often found many clicks away from the homepage of brands' websites or housed on micro-sites, not even on the brands' main website.* You would need *a lot of time to find the relevant information* and would require nuanced knowledge to make sense of the information that brands typically disclose.[6] (FTI 2017, 23)

The second paragraph, entitled *Lots of fluffy communication* (2), raises the issue of irrelevant information, referred to as "noise," in annual reports – a standardised genre, characterised by very long texts which need to contain mandatory information and may dedicate limited space to voluntary disclosures. The verb "decipher," which is used to describe what FTI researchers need to do when they attribute scores, suggests that the language utilised in annual reports can be likened to a foreign language one cannot fully understand. The final effect on consumers is therefore considered "confusing."

(2)   There were many instances where our researchers would trawl through a *300+ page annual report* only to find a couple of sentences that counted for transparent disclosure on some of the key issues we were looking at. As a result, there is a lot of "noise" to cut through; in other words, *pages and pages of information that don't tell you much about what brands are actually doing, or at least makes it difficult to decipher.* No wonder *even the most conscious consumer finds it all so confusing.* (FTI 2017, 23)

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[6] In all the quotations, italics indicates emphasis added by the authors of the present study.

The third paragraph, *No common framework for disclosure* (3), highlights the lack of a shared template. In the absence of legally required standards, brands resort to a variety of formats and non-verbal representations of information ("an array of different visuals"), which clearly make it difficult to grasp and compare the disclosed information. The paragraph also identifies the issue of "all sorts of language and industry jargon," which seems to indicate that specialised language is not always shared among the members of the fashion community.

(3)   There is a *lack of consistent standards* for reporting on social and environmental issues. There is *no common template*. Brands present information in *many different formats*, using *all sorts of language and industry jargon* and present it using an *array of different visuals* [...]. (FTI 2017, 23)

In 2018, the same content, expressed in almost identical words, is condensed in a single paragraph entitled *Information shared by major brands and retailers remains difficult to navigate, jargon-heavy and shallow*. The adjective "shallow" refers to irrelevant information, while, in the text which follows (4), the verb "bury" suggests that information is purposefully concealed and obscured by website writers.

(4)   The disclosure of *meaningful information and data by brands and retailers is often buried in company websites, housed on external microsites, in 300+ page annual reports or simply not available at all*. Brands present information in *many different formats*, using *all sorts of unclear language and industry jargon* and presented in an *array of different visuals*. (FTI 2018, 5)

While FTI 2019 contains no remarks about language, in FTI 2020 these are contained in the paragraph *Information dumping is an ongoing problem* (5), where it is hypothesised that brands deliberately use this strategy on web pages and in the attached documents in order to hide relevant information.

(5)   *Information and data dumping* almost seems like a *deliberate strategy* by some of the brands. For quite a few brands, we have found *information repeated over and over again across different web pages and documents*, often with *slightly different terminology but no substantive difference*. Sometimes brands use a large amount of *filler words* and *fluffy explanations and details* that obscure what information or data is actually relevant and useful to external stakeholders. [...] The brands that communicate best are those that set out what they are doing in a succinct, logical yet still detailed way.

> They also avoid [...] *fluffy storytelling devices that don't actually tell you much.* (FTI 2020, 5)

However, other interpretations need to be considered, based on the generic characteristics of such texts. "Information dumping" seems to be a hypernymic expression referring to various linguistic features. The first feature is repetitive information. This may, at least in part, be attributed to the very nature of the web genre, which is meant for non-linear reading, i.e., website users typically read just the sections they are interested in and not the whole website. Therefore, to ascertain that readers do not miss out important information, website writers repeat the same information across various sections, which target different addressees, e.g., visitors, investors, and job applicants.

In addition, the information provided on the web pages may well be repeated or made more specific in the attached official documents, e.g., annual and sustainability reports, policies, and guidelines. In this respect, it is unclear whether the prepositional phrase "with slightly different terminology" actually refers to terms, which are by definition specialised and therefore monosemic, or to lay words, meaning that in some texts information is rephrased through synonyms and periphrasis, possibly in an attempt to reach a public with various levels of specialisation.

The noun phrase "fluffy storytelling devices" may refer to parts of website texts which do not have an informative purpose and/or to the narrative parts of annual reports. Since FTI researchers scan the texts for specific information, storytelling may well be "fluffy" from their perspective, i.e., "obscure what information or data is actually relevant and useful to external stakeholders." However, on websites, storytelling does not certainly have an informative function but is rather aimed to attracting and entertaining visitors. What precisely is meant by "filler words" and 'fluffy explanations' is not clear, nor do these expressions correspond to identifiable linguistic categories.

FTI 2021 basically identifies the same problems, which are summarised in the paragraph entitled *Information overload, data dumping and fluffy storytelling remains a problem among many major fashion brands*. (FTI 2021, 13) The text which follows (6) describes the information provided by brands using four adjective phrases. "Overwhelming" and "impenetrable" refer to the pragmatic effect of the information on the addressee and respectively qualify the quantity as excessive and the quality as difficult to grasp. Whether such difficulty is due, for example, to the use of jargon, or to other causes is not stated. "Repetitive" refers to the actual propositional content and "difficult to find" to the problem of locating information, already mentioned in (2) and (4). The verbs "hide" and "bury" suggest that brands are strategically concealing information, as also explicitly mentioned in FTI 2020. The specialised nature of reports may

account for the presence of "annexes and footnotes." The final sentence contains a critique to the scarcity of factual information.

(6)   Some big brands communicate their human rights and environmental efforts in a way that is *overwhelming, impenetrable, repetitive* and *difficult to find*, making it virtually *impossible for their customers and stakeholders to decipher information* that is meaningful and actionable. Sometimes crucial pieces of data are *hidden in annexes and footnotes of long technical reports* or *buried dozens of clicks away from the* homepage *of brands' websites*. [...] At [...] times, there is so much information to read through, which is mostly just nice sounding copy about brands' values or stories about pilot projects which relate to a tiny fraction of their supply chains, that it almost seems like a *deliberate strategy to obscure and distract*. (FTI 2021, 13)

In FTI 2022, there are no descriptive linguistic remarks, but a quotation reported there (7) seems to urge companies to communicate clearly and concisely. In the quotation, the noun phrase "pages filled with rhetoric and empty words" probably refers again to the scarcity of factual information which researchers compiling the Index look for on corporate websites and in annual reports.

(7)   Transparency is not just about *bombarding the public with information*, but it is about presenting this *information in such a way that information can be easily found and understood*, and if necessary, challenged [...]. *Pages filled with rhetoric and empty words hide a lack of accessibility to scrutiny* and the necessary level of detail. (FTI 2022, 22)

FTI 2021 raises the issue that very few brands provide a definition of 'sustainable material'. This paucity of definitions is attributed, at least partly, to the lack of "common standards on what constitutes 'sustainable' materials for the fashion and textile industry." (FTI 2021, 11) In 2022, precisely because of the lack of legislation in this area and of "the pervasiveness of false marketing claims on 'sustainable fibres'," transparency on this aspect is considered "particularly important." (FTI 2022, 9)

Interestingly, the latest editions of the Index (2021-2022) devote more specific linguistic attention to the language used by brands as compared to the previous years. First, the 2021 and 2022 editions of the Index provide links to the "Brand Communication Guidelines on the Fashion Transparency Index," which are aimed to avoid companies' misuse of disclosures of the results of the Index (FTI 2022, 5; 2021, 5). Companies are urged, for example, not to use expressions which imply that the Index measures sustainability, i.e., "[BRAND] ranks [position]

in the Fashion Transparency Index 2021 which shows how we have been focused on improving working conditions in the supply chain." Instead, companies are told to use "e.g., [BRAND] are proud to have increased our public disclosure about our social and environmental policies, practices and impacts in Fashion Revolution's Fashion Transparency Index from [X]% in 2020 to [Y]% in 2021," which makes it clear that brands have increased their public disclosure.

Second, for the first time, the 2022 edition of the Index makes more precise linguistic remarks about the words and expressions which brands should avoid when disclosing their policies and commitments, so as to be awarded points by the FTI researchers, i.e., 'encourage,' 'suggest' and 'paying at a premium' (8).

(8)   We have strengthened our guidance for all indicators included in the Index [...]. For example, for Policies and Commitments subsection [...], when evaluating if brands have a policy on Overtime Pay, *just stating 'overtime is paid at a premium' is not sufficient. We are looking for disclosure of the percentage above minimum wage. Further, [...] we have not accepted points where brands' policies "encourage" or "suggest" that a supplier does something, it must be a requirement. Language, when ambiguous, can be used as a way to deflect responsibility and our aim was to more closely scrutinise language used."* (FTI 2022, 5; 35)

The FTI 2022 claims that 'paying at a premium' "is not sufficient" and brands should specify the percentage above minimum wage, thus implying that lack of precision is not accepted. Regarding 'encourage' and 'suggest,' the Index states that FTI researchers "have not accepted points where brands' policies "encourage" or "suggest" that a supplier does something, it must be a requirement." Stating that "[l]anguage, when ambiguous, can be used as a way to deflect responsibility," the Index implies that brands should avoid using 'encourage' and 'suggest' when disclosing their policies and commitments due to the ambiguity of the two verbs, since they do not imply that the brands take responsibility for their suppliers' behaviours. However, taking responsibility is not a linguistic issue, as the analysis in 5.2 shows. Only at the end of the paragraph does the Index briefly mention the reasons why such precise indications on the language to be avoided are given, claiming that the aim of the FTI compilers is "to more closely scrutinise language used."

Among all the linguistic remarks in the FTI (2016-2023) examined in the present Subsection, the 2023 edition only retains the one regarding *encourage* and *suggest* (9), without adding any further remarks on language.

(9)   we have not accepted points where brands' policies "encourage" or "suggest" that a
       supplier does something, it must be a requirement. Language, when ambiguous, can be
       used as a way to deflect responsibility and our aim was to more closely scrutinise
       language used. (FTI 2023, 41)

This shows that this issue is crucial for FTI researchers and, therefore, it was chosen for the
analysis in 5.2.

5.2 'Encourage' and 'suggest' in H&M's and Primark's policies across the supply chain

Subsections 5.2.1 and 5.2.2 introduce the policies and examine *encourage* and *suggest* in *H&M*
and *Primark* respectively.

5.2.1 H&M

5.2.1.1 Sustainability Commitment 2016

The *Sustainability Commitment 2016* supersedes the previous Code of Ethics and asserts that
adherence to legal requirements is essential for H&M. However, the policy emphasizes that
long-term success necessitates surpassing these legal standards. Consequently, the document
outlines both "requirements and expectations" applicable to each area of sustainability,
reflecting two distinct performance levels: "fundamental" and "aspirational." Semantically,
though, 'requirements' and 'expectations' pertain to entirely separate categories, each invoked
by different lexical expressions.

   The policy does not contain any instances of *encourage* and *suggest*. However, at the
"fundamental" level, requirements – specifically the duties and responsibilities of the supply
chain – are predominantly expressed using the modal verb *must*.

   In FrameNet, *must* evokes the REQUIRED EVENT frame, with FEs including REQUIRED
SITUATION, NEGATIVE CONSEQUENCES and PURPOSE:[7] "[u]nless a particular Required_situation
obtains, Negative_Consequences will follow. Alternatively, the Required_situation is required
to achieve a Purpose."[8] The frame, in turn, uses the BEING NECESSARY frame, which includes
the lexical unit *indispensable*, and is also part of a more complex OBLIGATION SCENARIO frame,
which includes the FEs DUTY, and undesirable social CONSEQUENCE, and adds the FE
RESPONSIBLE PARTY. In other words, the OBLIGATION SCENARIO frame consists of two sub-events:
"a Duty needs to be fulfilled by a Responsible party," and "if the Duty is not performed, there
may be some undesirable social Consequence for the Responsible party." The framal links
between *must*, *indispensable* in the BEING NECESSARY frame, and in the OBLIGATION SCENARIO

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[7] In all the examples, the frames and the FEs are in small capital.
[8] All the quotations regarding frames and FEs are from FrameNet. https://framenet.icsi.berkeley.edu/.

frame thus provide evidence that a semantic equivalence may be intended: *must* activates a duty, responsibility, or obligation as a frequent salient, indispensable type of purpose that has negative consequences if not achieved.

In the *Sustainability Commitment 2016* the FE PURPOSE, i.e., partnership with H&M, is always assumed and, similarly, the FE UNDESIRABLE SOCIAL CONSEQUENCE or NEGATIVE CONSEQUENCES, i.e., interruption of partnership with H&M, is generally not stated overtly. Instead, the FE DUTY or REQUIRED SITUATION is always overtly stated (10).

(10) ALL WORK PERFORMED *must* BE ON THE BASIS OF RECOGNIZED EMPLOYMENT RELATIONSHIP ESTABLISHED THROUGH NATIONAL LAW AND PRACTICE. (*Sustainability Commitment 2016,* 3)

The FE RESPONSIBLE PARTY is sometimes stated overtly as the subject of the verb *must*, as in (11); here too, the FE DUTY is stated overtly after *must*.

(11) ALL FARMS PRODUCING WOOL, HAIR AND DOWN USED FOR H&M PRODUCTS *must* MEET THE H&M REQUIREMENTS FOR GOOD ANIMAL HUSBANDRY, which are based on the Five Freedoms framework. (*Sustainability Commitment 2016*, 8)

However, in a few sections of the Commitment 2016, the fundamental requirements for fair living wages (12), working hours (13), and child labour and young workers (13) are articulated using the modal verb *should*, which does not convey the notion of a binding requirement.

(12) The wages and benefits paid for a standard working week meet, at a minimum, national legal level, industry level, or collective bargaining agreement, whichever is higher. In any event, A FAIR LIVING WAGE *should* ALWAYS BE ENOUGH TO MEET THE BASIC NEEDS OF EMPLOYEES AND THEIR FAMILIES, and provide some discretionary income. (*Sustainability Commitment 2016*, 4)

(13) Working hours in a week, as well as overtime hours, shall comply with national law, ILO Conventions or collective agreement, whichever affords the greater protection for workers, and be defined in contracts. In any event, EMPLOYEES […] *should* BE PROVIDED WITH AT LEAST ONE DAY OFF FOR EVERY 7 DAY PERIOD. (*Sustainability Commitment 2016*, 4)

(14) […] [P]ERSONS BELOW THE AGE OF 18 […] *should* BE PROTECTED FROM ANY HAZARDOUS WORK, NIGHT SHIFT AND ANY KIND OF WORK THAT MIGHT HAMPER THEIR DEVELOPMENT

OR IMPOSE ANY PHYSICAL HARM. […] THE BEST INTEREST OF THE CHILD *should* ALWAYS BE APPLIED IN CONSULTATION WITH THE CHILD'S PARENTS AND/OR GUARDIAN AND THE CHILD IT CONCERNS […]. (*Sustainability Commitment 2016*, 5)

Indeed, in FrameNet, *should* evokes the frame DESIRABLE EVENT, which includes FEs such as STATE OF AFFAIR and PURPOSE: "[a] particular state of affairs is desirable [or] may be required to achieve a purpose." This frame utilizes some FEs of the REQUIRED EVENT frame but presents it from the Cognizer's positive or negative viewpoint regarding the Required situation. Unlike *must*, *should* evokes the PREFERRED ALTERNATIVE SCENARIO frame, which involves two mutually exclusive scenes: the Profiled possibility, leading to a preferable positive consequence, and the Opposite possibility, leading to an undesirable consequence. Additionally, the DESIRABLE EVENT frame is linked to the TAKING SIDES frame, which includes lexical units such as *in favour*, *support*, and *against*. These framal connections between *should*, the PREFERRED ALTERNATIVE SCENARIO frame, and terms like *in favour*, *support*, and *against* in the TAKING SIDES frame suggest a semantic equivalence among these lexical items.

In H&M's *Sustainability Commitment* (12-14), *should* indicates that the willingness to comply with a FE REQUIRED SITUATION – such as a fair living wage (12), decent working hours (13), and rights of children and young workers (14) – is the preferred possibility, rather than a strict requirement, leading to a preferable positive outcome. At the aspirational level of performance, there are no instances of *encourage* and *suggest*; instead, desirable actions are expressed using *should* and *expect* (15-16).

(15) To reduce impact on water resources, THE FACILITY'S WATER BALANCE *should* BE ASSESSED and APPROPRIATE REDUCTION MEASURES TAKEN to show continuous improvement. (*Sustainability Commitment 2016,* 6)

(16) TO ENSURE STABLE COMPLIANCE WITH FUNDAMENTAL REQUIREMENTS AND ENABLE CONTINUOUS IMPROVEMENT to reach *aspirational* performance levels, we *expect* our Business Partners TO IMPLEMENT WELL-FUNCTIONING MANAGEMENT SYSTEMS. […] When submitting information on sustainability performance, Business Partners are *expected* TO BE TRANSPARENT AND NOT INTENTIONALLY MISLEAD H&M. Non-transparency is regarded as a violation of this Sustainability Commitment. (*Sustainability Commitment 2016*, 2)

In FrameNet, the EXPECTATION frame evoked by *expect* (16) includes the FEs COGNIZER, further qualified through the semantic type 'sentient,' and PHENOMENON: a "sentient Cognizer

believe[s] that some Phenomenon will take place in the future." The frame is in turn used by the PREDICTING frame, i.e., "[a] speaker states or makes known a future Eventuality on the basis of some Evidence." What seems contradictory in (16), however, is that, on the one hand, H&M *expects* business partners to be transparent and honest in their performance but, on the other hand, "[n]on-transparency is regarded as a violation of the Sustainability Commitment."

5.2.1.2 Sustainability Commitment 2022

In 2022, the *Commitment* was thoroughly revised from its previous 2016 edition to align with updates in legislation. Notably, the updated 2022 version eliminates the distinction between fundamental and aspirational levels of performance for each issue; instead, all commitments, duties, and responsibilities are framed as binding requirements articulated through *must*. This marks a departure from the 2016 edition, which differentiated between expectations and desirable events. The language of the 2022 policy reflects this shift: it does not include any instances of *encourage*, *suggest should*, or *expect*.

5.2.1.3 Sustainable Impact Partnership Program

The *Sustainable Impact Partnership Program* (henceforth, SIPP), available on the H&M website, outlines how the Group evaluates supplier compliance with the *Sustainability Commitment*. This evaluation is based on measurable social and environmental performance levels and is conducted through four steps: minimum requirements, self-assessment, validation, and capacity building. The policy also details non-compliance issues that could lead to the termination of collaboration with H&M. Although the SIPP does not explicitly differentiate between the fundamental and aspirational levels, it can be inferred that the minimum requirements step aligns with the fundamental level outlined in the 2016 Commitment. This inference helps explain why, at the stages following the minimum requirements, H&M *encourages* partners and suppliers to establish their own sustainability goals and priorities (17).

(17) Self-assessment involves suppliers reporting annual performance data and management system indicators, which help us understand their readiness and resilience. [...] WE *encourage* OUR SUPPLIERS TO SET THEIR OWN GOALS, PRIORITIES AND FOCUS AREAS. (*Self-assessment*)

In FrameNet, *encourage* evokes the SUBJECTIVE INFLUENCE frame, with FEs including AGENT/SITUATION/ENTITY, SENTIENT COGNIZER, and ACTION/BEHAVIOUR: this frame is described as a Situation in which a Sentient Cognizer may perceive an influence from an Agent/Situation/Entity concerning an Action in which the Cognizer is engaged or how the

Cognizer carries out a Behaviour that they are engaged in. Despite this influence, the Cognizer may not respond to it in any way. This frame, in turn, is used by the ATTEMPT SUASION frame, which includes the FEs SPEAKER, ADDRESSEE, and CONTENT and lexical units such as *suggest*, *advise*, etc.: "The Speaker expresses through language his wish to get the Addressee to act in some way that will help to bring about events or states described in the Content," without any implication that the Addressee expresses an intention to act. The framal links between *encourage*, *suggest* and *advise* provide evidence that a semantic equivalence may be intended.

In H&M, the assumption that the step in (17) goes beyond the minimum requirements would also explain why H&M states that they reward high-achieving and responsible business partners "who set ambitious goals and maintain good performance" with long-term business contracts and support them through growth opportunities such as training and workshops. No occurrences of *suggest* have been found, while in other contexts *must* is used.

5.2.1.4 Home Workers Guideline (2023) and Guideline on Responsible Recruitment of Migrant Workers (2023)

The *Guidelines for Home Workers*, which have been in effect since February 2017, were updated in November 2023. Similarly, the *Guidelines for Responsible Recruitment of Migrant Workers* were first drafted in August 2023. Neither of these policies includes *encourage* or *suggest*. Instead, duties and responsibilities are consistently expressed using *must* (18-19) and are occasionally emphasized by pragmatic markers (18). The policies do not differentiate between fundamental and aspirational levels of performance.

(18)　It *is a requirement* from H&M that THE SUPPLIER *must* HAVE VISITED THE VILLAGE […]. (*Guidelines for home workers 2023*, 2)

(19)　THE EMPLOYER *must* TAKE A PROACTIVE APPROACH TO FACILITATE MIGRANT WORKERS' RIGHTS TO FREEDOM OF ASSOCIATION […]. (*Guidelines on Migrant workers,* 3)

5.2.2 Primark

5.2.2.1 Modern Slavery Statement (2021)

The policy represents the sixth edition of the *Modern Slavery Statement* and encompasses the brand's activities for the financial year 2021, in accordance with the *UK Modern Slavery Act 2015*. In this policy, Primark does not differentiate between performance levels, such as fundamental or aspirational. While *suggest* does not appear, *encourage* is used in the context of addressing gender-based violence and harassment (20).

(20)   Primark's My Space programme introduced training on sexual harassment for staff and workers who were being trained to become workplace counsellors. FACTORIES *are encouraged* TO APPOINT THOSE WHO HAVE BEEN TRAINED TO THEIR INTERNAL COMPLAINTS COMMITTEES, the formal mechanism through which cases of workplace sexual harassment are addressed in India. (*Modern Slavery Statement 2021,* 8)

Across the entire policy, *must* is mainly used to describe the steps Primark is taking to require partners and suppliers to implement operational-level mechanisms; occasionally, *must* is strengthened further by pragmatic intensifiers (21). The FE RESPONSIBLE PARTY is sometimes overtly stated.

(21)   It is *mandated* that SUPPLIERS *must not* SOURCE COTTON FROM the Xinjiang Uyghur Autonomous Region (XUAR) (*Modern Slavery Statement 2021*, 37)

Should is also used, sometimes even in co-texts where *must* occurs and the FE RESPONSIBLE PARTY is generally not stated overtly (22).

(22)   1. THERE *should* BE A PROCEDURE that allows workers to raise and address workplace grievances, without fear of reprisal. […] 4. THE MANAGEMENT *must* ADDRESS WORKERS' CONCERNS promptly […]. (*Modern Slavery Statement 2021*, 31)

5.2.2.2 Primark Wood and Wood-derived fibre Policy (2022)

The *Primark Wood and Wood-derived Fibre Policy* is the second iteration of the brand's framework designed to protect ancient and endangered forests globally. After outlining the policy's purpose and Primark's ambitions to achieve its 2030 sustainability targets, the policy specifies the requirements for suppliers to ensure adherence to both "legal compliance" and "sustainability and responsible sourcing."

As expected, legal compliance is exclusively conveyed through *must*, exemplified in the formulaic expression "products *must* meet the legal requirement of the [country of origin and product category]," without specifying the FE RESPONSIBLE PARTY. The policy differentiates between prohibited sources, using *must not* (23), or the qualities that materials *should* have (24), suggesting that compliance with sustainability and responsible sourcing is viewed as a matter of degree. This is further supported by the fact that Primark *encourage*s specific sustainability practices (25).

(23)   Materials *must not*…[*sic*]

a) Derive from unknown sources, or timber that has been illegally harvested or traded.

b) Originate from wood harvested:

- from Ancient or Endangered Forests such as the Canadian and Russian Boreal Forests; […]

- from endangered species habitat. […]

(24)   Materials *should*…[*sic*]

c) Be certified by a recognised forest management certification scheme […].

d) Be purchased from fibre producers with a Canopy green shirt Hot Button […].

(25)   We *encourage* [e]xploration and assessment of fibres, paper and card made from agricultural residues or post-consumer waste recycled content. (*Our requirements*, 3)

5.2.2.3 Supply Chain Human Rights Policy (2023) and the Supplier Code of Conduct (2023)

The *Supply Chain Human Rights Policy* restates many of the requirements from the *Modern Slavery Statement* (2021) using identical language.

The *Supplier Code of Conduct*, now in its seventh edition, outlines the brand's standards for ensuring good working conditions and the protection of workplace rights within the supply chain.

The policy does not include *encourage* or *suggest*. Instead, compliance with these requirements is made mandated using *must* (26-27), either with (26) or without (27) specifying the FE RESPONSIBLE PARTY.

(26)   EMPLOYERS *must* PROVIDE A SAFE AND HYGIENIC WORKING ENVIRONMENT, bearing in mind the prevailing knowledge of the industry and of any specific hazards. (*Code of Conduct*, 3.1)

(27) Workers *must* BE PROVIDED WITH AT LEAST 1 DAY OFF IN EVERY 7 DAY PERIOD or, where permitted by national law, 2 days off in every 14 day period. (*Code of Conduct*, 6.5)

6. Discussion

6.1 Linguistic remarks in the FTI (2016–2023)

Concerning research question 1 (What type of linguistic remarks are expressed in the FTI and how are they expressed?), the diachronic analysis of FTI (2016-2023) revealed that FTI authors identified various issues in the brands' disclosure of sustainability-related information in

reports and websites. Since the FTI authors are not linguists, such remarks are, quite understandably, rarely expressed in appropriate linguistic terminology. "Industry jargon" is the only linguistic term used in the FTI (2016-2023). Apart from that term, FTI researchers use words which are utterly unclear from a linguistic perspective: "*shallow* information*"* (FTI 2018, 5), "*fluffy* communication" (FTI 2017, 23), "*fluffy* storytelling devices" (FTI 2020, 5), "*filler words* and *fluffy* explanations and details" (FTI 2020, 5), "*fluffy* storytelling" (FTI 2021, 13).

In addition, the FTI fails to take into account the following crucial aspects of annual reports and websites, the two genres considered in the Index. Regarding the difficulty in locating information in reports and websites, FTI researchers' remarks fail to consider that both genres are hybrid: they address stakeholders with different needs and background knowledge and, therefore, have a variety of communicative purposes. For these reasons, in reports, specialised information may be placed in annexes or footnotes, and, in websites, purely informative texts are seldom displayed on the most readily accessible web pages, which generally have a persuasive and/or an entertaining function.

Regarding repetitions occurring "across different web pages and documents" (FTI 2020, 5), FTI researchers did not consider that information may be repeated because stakeholders generally read the sections of websites and annual reports which respond to their specific needs and are appropriate to their background knowledge. The addressees' diverse needs and degrees of specialisation also explain why information is often repeated "with slightly different terminology but no substantive difference" (FTI 2020, 5), takes the form of storytelling or is expressed in jargon.

Regarding jargon, the FTI researchers failed to consider that, by increasing the number of the indicators of transparency, the complexity of the information required by brands also increases. This, in turn, is likely to result in more "jargon-heavy" (FTI 2018, 5) texts.

Concerning research question 2 (Do these remarks change over time and, if so, how?), the diachronic analysis revealed that, apart from the 2016 and 2019 editions of the Index, which do not contain remarks about language, the FTI 2017-2018 and 2020-2022 basically reiterate similar comments. The 2021 and 2022 editions seem to pay more attention to linguistic issues, since they provide "Brand Communication Guidelines on the Fashion Transparency Index."

The fact that the FTI 2022 and 2023 state that brands should avoid using *encourage* and *suggest* so as to be attributed points seems to confirm the FTI's increased attention to language. However, this interpretation is contradicted by the fact that, of all the remarks about language made in the previous editions, the FTI 2023 retains only the one about *encourage* and *suggest*, implying that they are instantiations of ambiguous language aimed to deflect responsibility.

6.2 'Encourage' and 'suggest' in H&M's and Primark's policies across the supply chain

Concerning research question 3 (Do *encourage* and *suggest*, as used in policies disclosing the sustainability commitments which brands require of their supply chain, really hinder transparency, as claimed by the FTI?), the analysis of the policies of the two brands reveals no occurrences of *suggest*. Instead, *encourage* is used by both H&M and Primark. In FrameNet, *encourage* evokes a scenario where an agent provides support or motivation to another person to engage them in a particular activity or course of action. The agent's words are intended to positively influence the other person's willingness to perform the activity.

In H&M, *encourage* is used, as expected, in relation to what the brand designates as the "aspirational level of performance." This refers to the sustainability performance that H&M, as the agent, seeks from the supplier, as the other party, beyond the binding requirements. Unexpectedly, *encourage* is also used in the discussion of what H&M calls the "fundamental level of performance" which the brand requires of the supply chain, i.e., to express legally binding requirements. At this level, *encourage* is used by H&M alongside *must*, which, in FrameNet, evokes a scenario where an action is required of some responsible party, i.e., the supplier, and this action is obligatory or compulsory according to some authority, i.e., H&M; if the action is not performed, negative consequences will follow for the responsible party. In Primark, although the brand does not distinguish between fundamental and aspirational levels of performance, sometimes *encourage* is also used in the same contexts where *must* occurs. The frame analysis of *encourage* and *must* reveals that the two verbs foreground different aspects of the REQUIRED SITUATION frame: *encourage* foregrounds prediction and desirability, while *must* foregrounds obligation. The fact that both brands sometimes use *encourage* and *must* rather interchangeably within the same contexts where fundamental requirements are discussed seems to imply that different degrees of "requiredness" and responsibility for a duty or action are requested of the supply chain, causing ambiguity and, therefore, reducing transparency.

Concerning research question 4 (Are there other verbs, which were not identified by the FTI researchers, but equally hinder transparency?), the analysis reveals that at the aspirational level, in one policy H&M also uses *expect* alongside *encourage*. According to FrameNet, *expect* evokes a scenario where a Cognizer anticipates or believes that future events will take place, as well as a scenario where the Cognizer desires that certain outcomes will follow. While the use of *expect* at the aspirational level is correct as it indicates what the Cognizer, i.e., H&M, desires, what is unexpected is that later the same policy states that non-compliance with what H&M *expects* is regarded by the brand as a violation of its sustainability commitments, which is clearly a contradictory statement that hinders transparency. Additionally, the analysis revealed that both brands sometimes also use *should*, which the FTI never mentions, within the same contexts where *encourage* and *must* occur. In H&M, *should* is sometimes used alongside *must* and

encourage when the brand discusses the fundamental level of performance required of the supply chain and partners. In contrast to *must*, which denotes a binding requirement, *should* in FrameNet conveys a scenario where an action expected of a party, such as a supplier or business partner, is perceived as advisable or desirable according to a norm or authority, such as H&M. In Primark, too, *should* is also sometimes used within the same contexts where *encourage* and *must* occur. Again, the fact that both brands sometimes use the three verbs, i.e., *encourage*, *should*, and *must*, which express different degrees of 'requiredness,' within the same contexts causes ambiguity in terms of the responsibility required of the supply chain.

7. Concluding remarks

Recently, the concept of transparency, especially related to sustainability, has been in the forefront of corporate efforts and the fashion sector is no exception. With specific regard to fashion, scholars such as Richards (2021), James and Montgomery (2017), Egels-Zandén and Hansson (2016), and Egels-Zandén, Hulthén and Wulff (2015) provided various interpretations and operationalisations of transparency, breaking it down into different components and thus underlying the multifaceted nature of the notion. In addition, these scholars claimed that transparency is a matter of degree and, at times, expressed observations about the formats, channels and language through which brands disclose their sustainability-related efforts.

The FTI (2016-2023) is also based on the idea that transparency is a multi-layered notion and is a matter of degree: the concept is broken into measureable components and is increasingly refined over the years, extending the number of components. As was the case in the above-mentioned studies, the eight editions of the FTI make some remarks about the language used by brands when disclosing sustainability-related information. Given the nature of the Index, these remarks may be assumed to reflect the concerns of activists, researchers, industry experts, NGOs, and corporate partners.

It was the aim of the present study to investigate the linguistic issues identified in the FTI (2016-2023) through a diachronic content analysis of the various editions of the Index (2016-2023) and a frame analysis of *encourage* and *suggest*, mentioned in the Index as hindering transparency, and other related verbs used in policies disclosing the sustainability commitments which brands require of their supply chain.

The diachronic content analysis revealed that remarks on language do not feature in all the editions of the FTI. When present, remarks on language do not show substantial improvements over the years. Rather, the 2023 edition surprisingly limits its remarks to the use of *encourage* and *suggest*, even though, in the 2022 and 2023 editions, the FTI claims that its "aim was to more closely scrutinise language used" (FTI 2023, 41; FTI, 2022, 5; 35).

The FTI remarks on language are invariably very general, unclear from a linguistic perspective, mostly not substantiated with examples, and show a lack of generic awareness by the FTI authors. While this is quite understandable, since the authors are not linguists, it is doubtful whether their remarks may be useful for fashion brands. Therefore, if FTI authors' aim is really to "more closely scrutinise language used," it would be advisable for them to cooperate with linguists, so as to devise guidelines and training materials which are responsive the requirements of the fashion community.

The analysis of H&M's and Primark's policies across the supply chain revealed that, while the FTI invites brands to avoid using *encourage* and *suggest* because they hinder transparency, the Index does not consider other verbs, e.g., *should* and *expect*, which may equally hinder transparency; nor does the Index consider that the pragmatic function of any linguistic item must be analysed in the specific contexts in which it is used. Again, the fact that the Index urges brands to avoid using specific linguistic items without considering that their function is context-dependent points to the FTI authors' lack of linguistic awareness. This further highlights the FTI authors' need for cooperation with linguists, if their aim is to provide brands with linguistic guidelines for improving the transparency of their sustainability-related policies.

Acknowledgements

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