



BRAND PERFORMANCE CHECK

Deuter Sport GmbH

PUBLICATION DATE: FEBRUARY 2014

this report covers the evaluation period 01-07-2012 to 30-06-2013

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at multiple levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of the clothing brands have an enormous influence for good or ill on factory conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices.

In most apparel supply chains, clothing brands do not own factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a factory can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via www.fairwear.org. The [Brand Performance Check Guide](#) provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

01-10-2013

Conducted by:

Stefanie Santila Karl

Interviews with:

Katrin Bauer (Corporate Responsibility Manager)

Steve Buffinton (Head of Product Management)

Sebastian Schmidt (Supply Chain Manager)

Martin Riebel (Managing Director, since July 2013)

Scoring:

Affiliate Benchmarking scores and Performance Benchmarking categories will be published starting in 2014. During 2013, FWF will be testing out the new system and evaluating the appropriate threshold levels for Benchmarking categories.

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data. Future Brand Performance Checks will include improved usability and transparency for audit data.

AFFILIATE INFORMATION	
Headquarters:	Gersthofen
Member since:	01-08-2011
Product types:	Sportswear, Private Label, Bags & Accessories
Production in countries where FWF is active:	Viet Nam, China
Production in other countries:	None
BASIC REQUIREMENTS	
Workplan for this evaluation period was submitted?	Yes
Projected supplier register for this evaluation was submitted?	Yes
Actual supplier register for this evaluation period has been submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	100%

Summary:

Deuter Sport meets FWF's management system requirements for the second year of membership and goes beyond many of them. Deuter reached a monitoring threshold of 100% conducting audits and workplace education programme trainings at its production sites. Deuter Sport participates in FWFs project with various outdoor companies to assess the impact of hypothetical increases towards living wage benchmarks. Through this engagement Deuter Sport shows that it is committed to working towards implementation of living wages in collaboration with FWF.

1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries	0%	Countries with relatively low risk of labour violations as defined by FWF.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	100%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier register provided by affiliate.

Comment: Deuter Sport has substantial leverage at its supplier for backpacks. The suppliers produce almost exclusively for the company. This enables Deuter Sport to work effectively on improvements with this supplier. At its supplier for sleeping bags, Deuter has a leverage of 25%.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	100%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier register provided by affiliate.
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Comment: The company has long term relations with all its suppliers. Deuter Sport works with its current supplier for backpacks since 1994 and with its sleeping bag supplier since 2003.

1.3 Labour conditions are considered when selecting new suppliers	N/A	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
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Comment: All suppliers have been requested to sign the Code of Labour Practices (CoLP) and to complete the questionnaire on the FWF labour standards. Within the last financial year, there has been no new supplier.

1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed	N/A	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.
1.5 Company conducts audits at all new suppliers before placing orders	N/A	An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.	Audit documentation; must meet FWF audit quality standards.
1.6 Affiliate sources from an FWF factory member	No	When possible, FWF encourages affiliates to source from FWF factory members. The small number of factories in the programme means sourcing from FWF factory members cannot be a requirement.	Supplier register provided by affiliate.

Recommendation: When possible, FWF encourages affiliates to source from FWF factory members. FWF factory members have committed to implementing the CoLP and are frequently audited by FWF. Having the supplier for sleeping bags as a FWF factory member could be of advantage to Deuter and to the factory with regard to leverage of production of FWF affiliates at the supplier.

Comment: Deuter Sport is the only customer to its backpack suppliers and therefore there would be no advantage to neither Deuter Sport nor the supplier in becoming factory member. The supplier for sleeping bags could be a candidate. This will be discussed in the coming years.

1.7 Percentage of production volume from factories owned by the affiliate	0%	Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.	Supplier register provided by affiliate.
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Recommendation: FWF supports direct ownership of suppliers. Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.

Comment: None of the production sites are owned by the FWF affiliate. However, Deuter Sport is the only customer to its backpack supplier, hence the relationship is very close.

1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner	Yes, and improvement is rewarded	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.
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Comment: Deuter sources from two suppliers: For backpacks one supplier with three production sites and for sleeping bags one supplier with only one production site. Deuter has a stable relationship with its suppliers and does not consider changing sites. Deuter actively supports its suppliers with regard to implementation of the Code of Labour Practices.

1.9 The affiliate's production planning systems support reasonable working hours	General or ad-hoc system	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.
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Recommendation: FWF recommends a pro-active production planning system: The production planning system should be designed to reduce/prevent excessive overtime at a systematic level. Strong integrated systems should e.g. help to limit the effects of peaks in demand.

Comment: Deuter Sport is aware that (excessive) overtime is a crucial matter that requires a long term approach and careful production planning in cooperation with suppliers. Deuter Sport took new measures in 2012 to further improve production planning. The company adopted a new order planning process. Deuter Sport places its orders for backpacks every two weeks, the orders for sleeping bags every four weeks. The orders are placed much earlier than in previous years to allow a better distribution between peak and low season. Furthermore Deuter Sport is now asking all of its distributors to place their orders early. The company still sees room for improvement in its joint planning with its backpack supplier to manage expectations on both sides. A key question is how to distribute the orders evenly for the whole year to avoid extreme peak and low seasons.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	0%	Excessive overtime is one of the most common labour rights violations in high-risk production countries. It is often caused by poor production planning by brands.	Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.
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Comment: None of the FWF audits showed excessive overtime at the three production sites in Viet Nam.

1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime	Preventive approach + works with other customers	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Examples of root cause analyses and resulting changes in production planning/policy.
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Requirement:

Comment: Within the previous Brand Performance Check, FWF recommended Deuter Sport to investigate the root causes of excessive overtime. As part of such an analysis all incidents of overtime, their origin and severity has been recorded during a period which has been representative for an entire production season. After this analysis, a step-by-step plan was drafted by Deuter Sport and the factory to bring the amount of working hours down to legally allowed levels.

FWF audit reports conducted end of 2012 showed first results to Deuter Sports engagement in reducing overtime.

Deuter Sports is the only customer to its production site in Viet Nam. In China, Deuter Sports sources approx. 25% at the production site. Deuter Sports contacted other big customers of the factory to cooperate. Audit results of a report which the other customer has made were shared with Deuter.

1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries	Policy at a style level	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.
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Comment: Deuter Sport reaches an agreement on prices and delivery times with suppliers on the basis of negotiations after target prices are set on the basis of past experience. In the past years Deuter Sport and its backpack supplier had to deal with a few cases of unexpected price increases. In these cases both companies found a way to split the burden in a way that was acceptable for both. If prices go up due to increases in wages, Deuter Sport generally accepts that. In case the supplier asks for a price which is too high for new product styles to be able to sell, Deuter Sports reworks the product e.g. reduces trims to reach a price which is possible in the market where products are sold.

1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages	No failures by suppliers to pay minimum wage were reported during the past year	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.
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Comment: None of the audit reports within Deuters' previous financial year showed failures to pay minimum wage.

1.14 Evidence of late payments to suppliers by affiliate	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.
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Comment: None of the audit reports within Deuters' previous financial year showed evidence of late payments to the suppliers.

1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Supply chain approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondance with supplier, other relevant documentation.
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Comment: Deuter Sport participates in FWFs project with various outdoor companies to assess the impact of hypothetical increases towards living wage benchmarks. Through this engagement Deuter Sport shows that it is committed to working towards implementation of living wages in collaboration with FWF.

Additional comments on Purchasing Practices:

Deuter Sport has a two suppliers for its two product groups: One supplier using three production sites for backpacks, one supplier for sleeping bags.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring	100%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership (Threshold is 40% first year, 60% second year of membership and 90% thereafter)	Does meet threshold	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.

Comment: Deuter Sport has designated staff to coordinate activities to monitor and improve working conditions in factories and a systematic way to manage the process to follow up on corrective action plans.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	An in-depth effort has been made to address most or all CAPs	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.
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Requirement:

Comment: The verification audit conducted by FWF end of 2012 showed good improvements towards resolution of CAPs at the three production sites in Viet Nam.

After the initial audit the supplier reported progress on a regular basis to the corporate responsibility manager of Deuter Sports. The production manager who visits the supplier each 4-6 weeks is involved in the process to follow up on the corrective action plan (CAP) by the corporate responsibility manager and checks on specific issues when at the factory. Relevant information from meeting reports of staff of the purchasing department is included in the CAP follow up system.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	100%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.
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Comment: The person responsible for CSR visits the production sites at least one time per year. Both suppliers visit the headquarter in Germany one time per year and join Deuter at the outdoor fair in Friedrichshafen. In addition other staff from Deuter (including top management) visits the production sites on a regular basis. Travelling staff is informed about the status of corrective actions in case details need to be discussed at the production site.

2.4 Existing audit reports are collected	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.
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Comment: For its supplier of sleeping bags, Deuter Sport collected an existing audit report from a main customer of the supplier. Deuter Sport followed up on the existing CAPs. As the existing audit report has been insufficient in quality, Deuter Sport plans to audit this supplier in 2013/2014.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.
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Comment: Corrective action plans resulting from audits are followed up by Deuter Sport by requesting the supplier to give a periodic update on progress in realizing improvements. Deuter Sport collects pictures and documents via email as a way to provide evidence on realised improvements. Improvements are also checked during regular visits at the production sites.

2.6 A structured approach is used to address issues that occur at multiple suppliers	Yes	Issues that occur in multiple factories often need to be addressed in a systemic manner, especially when the root causes are located in brand management choices or from regionally specific issues (e.g. fire safety, gender discrimination and harassment).	Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.
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Comment: The supplier in Viet Nam produces Deuter products at three production sites. A structured approach was used to address the issues that occurred at the different production sites.

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	No CAPs active or no shared suppliers during past year	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.
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2.8 Monitoring requirements are fulfilled for production in low-risk countries	No production in lowrisk countries	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.
2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	Supplier register; Documentation of sales volumes of products made by FWF or FLA members.

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	NA	
Number of worker complaints resolved since last check	NA	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.

Comment: Deuter Sport has a designated person responsible for handling complaints and is sufficiently aware of how FWFs complaints procedure works.

3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.
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Comment: Deuter Sport generally sees to it that the Code of Labour Practices (CoLP) including contact information of the local complaints handler of FWF is posted in factories in a location that is accessible to workers. The company collects photos of the posted document during visits of purchasing staff as evidence. The audits by FWF teams in 2012 at the backpack supplier of the company in Viet Nam confirmed that the translated document is posted in the workplace at all production sites.

3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	100%	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.
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Recommendation: The affiliate can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline.

Comment: The factories in Viet Nam organize health and safety trainings every week, where the FWF Code of Labor Standards is explained to workers. However several of the interviewed workers still lack awareness of this.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints were received during past financial year	Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.	Documentation that affiliate has completed all required steps in the complaints handling process.
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3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints were received during past year	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.
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4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
4.1 Staff at affiliate is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.

Comment: Staff of Deuter Sport is sufficiently informed about steps taken to implement FWF membership requirements. This is mainly done through an internal presentation that is done twice a year by the corporate responsibility manager to all staff of Deuter Sport.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.
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Comment: In addition to the regular meetings twice a year, staff in direct contact with suppliers is informed on a day to day basis. This gives the flexibility to discuss certain issues in detail.

4.3 Agents are informed of CoLP requirements and act to support their implementation	Affiliate does not use agents	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.
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4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	100%	Lack of knowledge on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.
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Comment: After a recommendation in the first Brand Performance Check, Deuter Sport enrolled its supplier in China in FWFs Workplace Education Programme (WEP). WEP trainings contribute to social dialogue between workers and management. The introductory training of WEP builds awareness of labour standards and strengthens dispute handling mechanisms. It is made available to FWF members free of charge.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.
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Recommendation: FWF recommends Deuter Sport to engage suppliers in Viet Nam into trainings offered by ILO Better Work.

Comment: The production sites in Viet Nam have been audited regularly. No additional trainings have been given so far.

Additional comments on Training and Capacity Building:

Sales representatives meet at the headquarter at least once a year. Part of the information is about social standards and Fair Wear Foundation membership requirements.

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
5.1 Supplier register for the previous financial year is verified as being complete and accurate	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.

Comment: The company maintains its supplier register on the basis of order administration and the annual questionnaires that are collected from factories and systematically analysed.

The supplier register for 2012 meets the requirements of FWF. It lists all factories that manufacture backpacks and sleeping bags for Deuter Sport. For each supplier it specifies production location data, FOB value and important other customers of suppliers.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.
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Comment: Information on the status of corrective action plan is systematically collected and maintained on the corporate server. This information includes updates from purchasing staff and top management visiting suppliers. Discussions with suppliers on specific improvement points are well documented.

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.

Requirement:

Comment: Deuter Sport informs consumers and other external parties about its approach to improve working conditions through its corporate website, dealer workbooks, product flyers and store meetings. This happens in correct wording and with references to FWFs website for further information.

Deuter Sport makes use of on product communication to inform consumers about FWF membership with its backpacks. As the production site in China producing sleeping bags has not been audited yet, Deuter is waiting for on-garment communication on sleeping bags until the audit report and CAP has been received and if needed findings have been started to be implemented.

6.2 Affiliate engages in advanced reporting activities	Yes	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.
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Comment: In its external communications Deuter Sport discloses the name and detailed info on its supplier for backpacks. FWF regards this as a best practice since it contributes to transparency on working conditions in supply chains. Deuter evaluates whether the supplier for sleeping bags also agrees that the FWF affiliate uses the suppliers name in its communication.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Yes	The Social Report is an important tool for brands to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.
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Additional comments on Transparency:

The corporate responsibility manager of Deuter Sport is actively participating in seminars, round tables and working groups. By doing so the company contributes to growing awareness of working conditions in factories among consumers and in the outdoor industry. As all external representations are also reported about within the company this contributes to general awareness of corporate responsibility of Deuter staff.

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	No	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.

Recommendation: FWF recommends evaluating once a year if the approach to improve working conditions is effective. The evaluation could for example assess which improvements were (not) successfully implemented in factories, whether the chosen approach was cost efficient, whether purchasing practices have been supportive for implementation of the Code of Labour Practices and if FWF membership was successfully communicated to external parties.

Comment: Deuter Sport discusses progress in implementing FWF membership as part of regular internal discussions. This was mostly done quickly after the audits.

A yearly evaluation of FWF membership has not yet taken place.

7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.
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Comment: Deuter had two requirements in their brand performance check 2012 with regard to the information given in the supplier register. Both FWF requirements are fulfilled now.

Additional comments on Evaluation:

Deuter Sport collects feedback from factories as part of ongoing discussions. Due to the limited amount of suppliers a formal way of evaluating implementation of the Code of Labour practices offers little added value.

RECOMMENDATIONS TO FWF

Deuter Sport wishes to receive more experience sharing among FWF affiliates with regard to e.g. implementation of CAPs.

Deuter Sport likes the way FWF integrates new systems/policies together with its affiliates.