



Brand Performance Check

ODLO International AG

September 2013

This report covers the evaluation period
January 2012 to December 2012

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 FWF Performance Benchmarking Guide provides more information about the indicators and is available for download.

Brand Performance Check Details

Date of Brand Performance Check	3-Jul-13	
Conducted by:	Juliette Li Stefanie Santila Karl	
Interviews With:	Jason Peyer Urs Wittausch Thomas Spiess Regina Goller Christina Hanke	Sourcing & Logistics Manager, Responsible for CSR Head of Production/Logistics/CSR Director Supply Chain Management R&D Manager Materials Head of International Marketing

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.

ODLO International AG (hereafter: ODLO)

2013 Brand Performance Check

Affiliate Information		
Headquarters:	Huenenberg	Switzerland
Member Since:	October	2008
Product Types:	Sportswear, Outdoor, Bags & Accessories	
Production countries:	FWF Active Countries: China, India, Italy, Portugal, Romania, Thailand Other countries: Indonesia, Israel, Jordan, Germany	
Basic Requirements		
Workplan for this evaluation period was submitted?	Yes	Must be submitted before start of evaluation period
Projected supplier register for this evaluation was submitted?	Yes	Must be submitted before start of evaluation period
Actual supplier register for this evaluation period has been submitted?	Yes	Must be submitted after the end of the evaluation period.
Membership fee has been paid?	Yes	
All suppliers have been notified of FWF membership?	Yes	
Scoring Overview		
Summary	<p>ODLO is in the process of implementing FWF's requirements. 74.5% of the company's total turnover was audited. As a FWF member for more than 5 years, ODLO has not reached the monitoring threshold of 90%. ODLO is expected to improve its monitoring practice in 2013 to monitor at least 90% of its total turnover. ODLO has participated in a FWF project together with other outdoor companies to assess the impact of hypothetical increases towards living wage benchmarks. ODLO has an efficient system to implement CAPs at factory level. ODLO engages highly with other FWF affiliates when sourcing at the same production site. ODLO is recommended to enhance activities with regard to trainings and capacity building.</p>	

Purchasing Practices

Basic Measures		Comments
% of production in low-risk countries	12.1%	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.	88%	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.
1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years.	89%	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.
1.3 Labour conditions are considered when selecting new suppliers.	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
	Comment: ODLO does not frequently look for new suppliers. When there is a need to develop new product design, ODLO first approaches the existing suppliers. If working with a new supplier is inevitable, ODLO chooses a factory that is recommended by organisations such as GOTS. Before placing an order, the production manager visits the production site and discusses the FWF CoLP with the factory.		
1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	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.
	Comment: All existing and new suppliers receive the FWF CoLP. Suppliers sign the CoLP at the start of cooperation after sampling. If a factory does not accept the FWF standard ODLO does not start production at that production site.		

<p>1.5 Company conducts audits at all new suppliers before placing orders.</p>	<p>No</p>	<p>An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.</p>	<p>Audit documentation; must meet FWF audit quality standards.</p>
<p>Comment: As ODLO usually chooses factories recommended by auditing initiatives, new production sites usually produce for other big brands and have been audited already. Audit reports are cross-checked with the FWF audit quality assessment tool.</p>			
<p>1.6 Affiliate sources from a FWF factory member.</p>	<p>Yes</p>	<p>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.</p>	<p>Supplier register provided by affiliate.</p>
<p>Comment: ODLO's second highest purchasing volume is done at this FWF factory member (approx. 5%; considering ODLO's production volume at all suppliers).</p>			
<p>1.7 Percentage of production volume from factories owned by the affiliate.</p>	<p>34%</p>	<p>Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.</p>	<p>Supplier register provided by affiliate.</p>
<p>Comment: ODLO owns one production site in Portugal and Romania. Portugal is considered low-risk at FWF. Romania high-risk. Both production sites produce exclusively for ODLO.</p>			
<p>1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner.</p>	<p>Yes</p>	<p>A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.</p>	<p>Documentation of systemic approach: rating systems, checklists, databases, etc.</p>
<p>1.9 The affiliate's production planning systems support reasonable working hours.</p>	<p>Strong, integrated systems in place</p>	<p>Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.</p>	<p>Documentation of robust planning systems.</p>
<p>Comment: ODLO demonstrated strong efforts in supporting suppliers in reducing overtime. The company focused on three strategies to support the suppliers which have been initiated in 2012.</p> <ul style="list-style-type: none"> - ODLO recognized that fabric delay could cause overtime at their CMT suppliers. The fabric sourcing department kept the suppliers updated regarding the fabrics. Standard lead time ranged from 105 to 135 days. Standard lead time was applied after the fabrics arrived. - ODLO used an internet based tool to be transparent on its production planning. ODLO shared periodical demands in its shops with its suppliers. Suppliers could plan their own production based on the needs of the shops of ODLO. This system enables suppliers to distribute production evenly as much as possible during a longer period of time. - ODLO has a forecast for about 40% of the products. Here ODLO orders more regular throughout the year to reduce production peaks at the production sites. This causes extra stock cost to ODLO and binds capital but is a step towards reduction of overtime at the production sites. 			

<p>1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF.</p>	<p>100%</p>	<p>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.</p>	<p>Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.</p>
<p>Comment: Two audits conducted in the reporting period showed excessive overtime. Requirement: The affiliate has to take adequate steps to ensure reasonable working hours at the production sites. An OT root cause analysis at factory level is expected.</p>			
<p>1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime, if found.</p>	<p>Preventive Approach</p>	<p>Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.</p>	<p>Examples of root cause analyses and resulting changes in production planning/policy.</p>
<p>Recommendation: FWF recommends ODLO to analyse root causes of excessive overtime and work together with other customers at</p>			
<p>1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.</p>	<p>Affiliate can demonstrate a pricing policy based on country level data. Minimum wage levels are known by affiliate in all production countries.</p>	<p>The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.</p>	<p>Formal systems to calculate labour costs on per-product or country/city level.</p>
<p>Comment: ODLO knows the wage share per style and for the production sites of own production they also know the production cost per minute. The challenge of ODLO is to get an insight into labour cost per working minute of production sites, which are not owned by the company. ODLO participated in 2012 in a project to support living wages at the production site. Requirement: ODLO should investigate on labour cost per working minute of production sites that are not owned by the brand. ODLO can start with factories which they have a higher leverage.</p>			
<p>1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages.</p>	<p>Yes</p>	<p>If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.</p>	<p>Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.</p>
<p>Comment: An audit in India in 2010 showed payments below minimum wage. ODLO could show that they have worked on this matter together with the supplier continuing its efforts in 2012.</p>			

<p>1.14 Evidence of late payments to suppliers by affiliate.</p>	<p>No</p>	<p>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.</p>	<p>Based on a complaint or audit report; review of factory and affiliate financial documents.</p>
<p>1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers.</p>	<p>Factory Level Approach</p>	<p>Sustained progress towards living wages requires adjustments to affiliates' policies.</p>	<p>Wage ladders, correspondance with supplier, other relevant documentation.</p>
<p>Comment: Audits revealed that at the suppliers workers were not always paid on a level that FWF local stakeholders estimate as a living wage. ODLO participates in FWF's project with various outdoor companies to assess the impact of hypothetical increases towards living wage benchmarks. Through this engagement, the company shows that it is committed to working towards implementation of living wages. Requirement: Sustained progress towards living wages requires adjustments to affiliates' policies for all suppliers.</p>			

Purchasing Practices Comments:

Monitoring & Remediation

Basic Measures		Comments
% of own production under monitoring	74.50%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership:	90% (does not meet threshold)	1 year: 40%; 2 years 60%; 3 years+: 90%

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.
2.2 Degree of progress towards resolution of existing Corrective Action Plans.	Moderate efforts have been made to address most 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.
	<p>Comment: The CAP is used as a controlling instrument between ODLO and the manufacturer. The Head of Sourcing discusses the CAP together with the person in charge when visiting the factories. The follow up of the CAP is a standard agenda point at any visit to the production site. The progress and evaluation of the CAP takes place after each visit at the production sites during regular meetings with the CSR Team and the Head of Sourcing and Production.</p> <p>An audit in India in 2010 showed that minimum wage was not paid to most workers at the production site.</p> <p>Recommendation: To enhance existing systems with the Indian suppliers also to other suppliers and to evaluated all suppliers compliance in a systematic manner.</p>		
2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year.	78%	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.

<p>2.4 Existing audit reports are collected.</p>	<p>Yes</p>	<p>Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.</p>	<p>Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.</p>
<p>Comment: ODLO collects existing audit reports. Recommendation: FWF recommends to evaluate the quality of existing audit reports with the FWF audit quality assessment tool. Existing audit reports should be used for implementation of findings at the production site.</p>			
<p>2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner.</p>	<p>Yes</p>	<p>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.</p>	<p>Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.</p>
<p>Comment: The CSR responsible staff and the management of sourcing department are in touch with factory management to discuss CAPs regularly.</p>			
<p>2.6 A structured approach is used to address issues that occur at multiple suppliers.</p>	<p>No</p>	<p>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).</p>	<p>Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.</p>
<p>Comment: ODLO has already a good approach to work on overtime at a strategic level and living wages at certain production sites. Recommendation: ODLO could do a brand level research including data from factories in high risk countries to identify the root causes of OT.</p>			
<p>2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers.</p>	<p>Active Cooperation</p>	<p>Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.</p>	<p>Shared CAPs, evidence of cooperation with other customers.</p>
<p>Comment: ODLO cooperates with other FWF affiliates in resolving corrective actions at shared suppliers.</p>			
<p>2.8 Monitoring requirements are fulfilled for production in low-risk countries.</p>	<p>Yes</p>	<p>Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.</p>	<p>Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.</p>

<p>2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)</p>	<p>Not Applicable</p>	<p>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.</p>	<p>Questionnaires are on file.</p>
<p>2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)</p>	<p>Not Applicable</p>	<p>FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.</p>	<p>Supplier register; Documentation of sales volumes of products made by FWF or FLA members.</p>

Monitoring Comments:

After an initial audit in India in 2010, ODLO used a FWF local auditor for consultancy towards remediation of findings.

Complaints Handling

Basic Measures		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.	N/A	
Number of worker complaints resolved since last check.	N/A	

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: The CSR responsible person of ODLO is the designated person to handle complaints filed by workers of their suppliers.		
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.
	<p>Comment: Over 90% of the production sites are visited on a yearly basis. The posting of the CoLP is documented with pictures. In general ODLO makes good effort to ensure suppliers to post the Code of Labour Practices at the factories so that workers have access to the information of FWF and its complaints handler. FWF conducted two verification audits in 2012 at suppliers of ODLO. It was found that the Code of Labour Practices (CoLP) was posted at both suppliers. In China workers were well aware of the CoLP. At the supplier in Thailand, the CoLP did not include the telephone number of the complaints handler.</p> <p>Requirement: ODLO should make sure the CoLP in local language with contact details of the local complaints handler is posted in all production sites.</p>		

<p>3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline.</p>	<p>50%</p>	<p>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.</p>	<p>Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.</p>
<p>Comment: The workers in the factories where verification audits took place were not aware of FWF and its CoLP. Recommendation: It is recommended to engage in training activities for management and workers to ensure that staff at production sites is aware of rights and duties with regard to labour standards as well as grievance mechanisms.</p>			
<p>3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure.</p>	<p>Not applicable</p>	<p>Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.</p>	<p>Documentation that affiliate has completed all required steps in the complaints handling process.</p>
<p>3.5 Cooperation with other customers in addressing worker complaints at shared suppliers</p>	<p>Not applicable</p>	<p>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.</p>	<p>Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.</p>

Complaints Comments

ODLO had a complaint at one production site in 2009. As a result of this complaint the factory became a FWF factory member. Also as a result of this ODLO has a formal complaints handling system to be prepared for coming complaints.

Training & 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 ODLO is sufficiently informed about FWF membership and the implementation of the Code of Labour Practices. - Information about FWF is provided through internal meetings. - New staff is informed by their colleagues and through company meetings.		
4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements.	No	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.
	Recommendation: FWF recommends ODLO to participate in Wellmade-Sessions, FWF Seminars, or other training activities. FWF can be of help upon request.		
4.3 Agents are informed of CoLP requirements and act to support their implementation.	Yes, and agents actively support implementation of the CoLP.	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.
	Comment: ODLO uses one agent in China. ODLO works with this agent already since 1998. The agent is informed well, participated in an audit and follows up on CAPs together with staff from ODLO.		
4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume).	0%	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.
	Recommendation: FWF offers training to workers on their labour rights, internal grievance mechanism and the FWF complaints handling procedure. The Workplace Education Programme is currently available to suppliers of FWF affiliates free of charge. ODLO could use this opportunity to inform workers regarding FWF and its labour standards.		

<p>4.5 Factory participation in trainings (where WEP is not offered; by production volume).</p>	<p>0%</p>	<p>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.</p>	<p>Curricula, other documentation of training content, participation and outcomes.</p>

Training & Capacity Building Comments

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.
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.
Comment: CSR activities are integrated in the production department, hence information is always available to relevant staff.			

Information Management Comments:

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.
	<p>Comment: ODLO informs the public about its FWF membership through its website, brochures and catalogues. The logo of FWF is also shown prominently at the head quarter office, ODLO stores and at trade fairs. ODLO also shares a link to the FWF labour standards brochure.</p> <p>Requirement: According to the previous communication policy, ODLO is allowed to have on-garment FWF logo. During this reporting period, ODLO has not met monitoring requirements, thus ODLO should either stop on-garment communication, or make sure that it meets monitoring requirements as soon as possible (audit at least 90% of it total production volume).</p>		
6.2 Affiliate engages in advanced reporting activities.	No	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.
	<p>Recommendation: FWF recommends advanced reporting activities. This could be done by either publishing the Brand Performance Check, Audit Reports and/or the Supplier List online at the brand's website.</p>		
6.3 Social Report is submitted to FWF and is published on affiliate's website	Published on affiliate's website	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.
	<p>Comment: The social report is part of ODLO's CSR Report which is published on FWF and the FWF affiliates' website.</p>		

Transparency Comments:

Evaluation

Performance Indicators	Result	Relevance of Indicator	Documentation
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.
Comment: CSR Management Team and Executive Board meet every August for a so called "strategy updating process"-meeting. ODLO reports to the Executive Board quarterly which gives the input for the yearly meeting.			
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.

Evaluation Comments:

Comments to FWF

This area provides an opportunity for affiliates to provide feedback to FWF.

1. ODLO asks FWF to inform it's members better on developments and strategical changes at FWF with regard to FWF membership requirements. This would leave FWF affiliates more time to adjust to the new systems.
2. ODLO is considering an own database to follow up CSR matters. To avoid double work, ODLO would like to have a road map map for developments with regard to the FWF database for the next 2 years.
3. ODLO would like to cooperate with FWF more on social media activities.