



# Brand Performance Check

Schöffel Bekleidungs GmbH

August 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](http://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	21-Mar-13	
Conducted by:	Stefanie Santila Karl	
Interviews With:	Peter Schöffel	CEO
	Torsten Müller	COO
	Stephanie Richter	Head of Planning Department
	Corinna Umbach	Director Marketing
	Ilka von Goerne	Communication
	Marlies Hartmann	Head of Quality
	Marco Hühn	CSR Coordinator

## 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.

# Schöffel Sportbekleidung GmbH (hereafter Schöffel)

## 2013 Brand Performance Check

<b>Affiliate Information</b>	
<b>Headquarters:</b>	Schwabmünchen Germany
<b>Member Since:</b>	February 2011
<b>Product Types:</b>	Sportwear, Outdoor, Bags & Accessories, Professional Wear
<b>Production countries:</b>	FWF Active Countries: China, Bulgaria, Italy, Poland, Romania, Turkey, Vietnam Other countries: Germany, Indonesia, Latvia, Serbia
<b>Basic Requirements</b>	
<b>Workplan for this evaluation period was submitted?</b>	Yes Must be submitted before start of evaluation period
<b>Projected supplier register for this evaluation was submitted?</b>	Yes Must be submitted before start of evaluation period
<b>Actual supplier register for this evaluation period has been submitted?</b>	Yes Must be submitted after the end of the evaluation period.
<b>Membership fee has been paid?</b>	Yes
<b>All suppliers have been notified of FWF membership?</b>	Yes
<b>Scoring Overview</b>	
<b>% of suppliers under monitoring</b>	74.21%
<b>Summary</b>	Schöffel Sportbekleidung GmbH meets FWFs management system requirements for the second year of membership and goes beyond some of them. Schöffel has encouraged a first factory to join the workplace education training programme and started recruiting other factories for 2013. Schöffel is highly ambitious sharing information on social standards with other FWF affiliates and brands which are not affiliated to FWF.

## Purchasing Practices

Basic Measures		Comments
% of production in low-risk countries	7%	Countries with relatively low risk of labour violations as defined by FWF.

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity.</b>	55%	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.
<b>1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years.</b>	83%	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.
	Comment: Schöffel has relationships with suppliers which go up to cooperation since 1968.		
<b>1.3 Labour conditions are considered when selecting new suppliers.</b>	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
	Comment: Schöffel has developed a written policy which is used internally and send to every new supplier (so called 'partnership		
<b>1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.</b>	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: Schöffel has a structured system in place including detailed pictures of postings of CoLP.		
<b>1.5 Company conducts audits at all new suppliers before placing orders.</b>	Not applicable	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.

	<p>Comment: Before start of production at a new supplier, the candidate is visited by Schöffel and a small test order is placed. The test order is evaluated, among others, with regard to social standards. New suppliers are generally already involved in CSR issues, existing audit reports collected. Hence Schöffel and FWF do not see reasoning for Schöffel to audit again before production starts.  Recommendation: In case the test order is successful and a new supplier cannot provide an existing audit report, FWF suggests to audit this new supplier before placing orders.</p>		
<b>1.6 Affiliate sources from an FWF factory member.</b>	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.
<b>1.7 Percentage of production volume from factories owned by the affiliate.</b>	None	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.
<b>1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner.</b>	Yes	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.
	<p>Comment: Schöffel is committed continuing to work with existing suppliers. The company sees no added value in rewarding suppliers that realised improvements with extra orders.</p>		
<b>1.9 The affiliate's production planning systems support reasonable working hours.</b>	General System	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.
<b>1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF.</b>	100%	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.
	<p>Comment: All FWF audit reports show that excessive overtime was found. One factory has been re-audited in 2012 and improvements were visible also with regard to overtime issues.</p>		
<b>1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime, if found.</b>	Reactive Approach	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.
	<p>Comment: If overtime is found in the audit reports, a follow up process is agreed upon with the supplier.  Recommendation: Schöffel is recommended to analyse root causes at the company and factory level for overtime at the production</p>		

<b>1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.</b>	Affiliate can demonstrate a pricing policy based on country level data. Minimum wage levels are known by affiliate in all production countries.	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.
Comment: FWF wage ladder from audit reports is used as a basis. In case a country raises the minimum wage level, this is checked upon with the suppliers and wages raised. To have a good understanding of wages, Schöffel sees more information/wage ladders needed which will come when follow up audits are conducted.			
<b>1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages.</b>	Not Applicable	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.
None of the FWF audits showed payments below minimum wage.			
<b>1.14 Evidence of late payments to suppliers by affiliate.</b>	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.
Comment: FWF audit reports did not show any evidence that Schöffel pays the suppliers late.			
<b>1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers.</b>	Basic Approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondance with supplier, other relevant documentation.
Comment: Schöffel regards the FWF wage ladder as useful information to understand how suppliers are placed pricewise. Wage ladders are at the moment not used to work on improvements in wages.			

**Purchasing Practices Comments:**


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## Monitoring & Remediation

Basic Measures		Comments
% of own production under monitoring	74.21%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership:	60% (meets threshold)	1 year: 40%; 2 years 60%; 3 years+: 90%

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>2.1 Specific staff person is designated to follow up on problems identified by monitoring system.</b>	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: Schöffel has staff designated to follow up on problems identified in the monitoring system.		
<b>2.2 Degree of progress towards resolution of existing Corrective Action Plans.</b>	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
	Comment: Implementation of CAPs are done indirect via emails, phone calls, etc. and direct communication during factory visits. Problems are followed up on two levels - per CAP with the factory and with a strategic approach by COO and CEO.		
<b>2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year.</b>	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.
	Comment: Staff from Schöffel visits all suppliers each year several times.		
<b>2.4 Existing audit reports are collected.</b>	Yes and quality assessed.	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.
	Comment: At the moment Schöffel only counts FWF audit reports towards the threshold. Additionally existing audit reports are collected. The reports are analysed and a corrective action plan (if not existent already) noted and shared with the supplier. Schöffel plans to audit such production sites in 2013/14 to ensure that CAPs have been implemented.		



<b>2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner.</b>	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.
<b>2.6 A structured approach is used to address issues that occur at multiple suppliers.</b>	No	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.	Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.
Recommendation: FWF suggests that the affiliate analyses whether findings from a factory audit could occur at other suppliers as well. This will lead to a preventive approach where issues are addressed in a systematic manner. The analysis should focus on own brand practices as well as regional or country specific issues (such as fire safety or gender discrimination).			
<b>2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers.</b>	Active cooperation	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.
Comment: Schöffel shares actively audits and CAPs with other customers no matter whether they are FWF member or not. Typically one of the brands takes initiative in coordinating the CAP follow up process and keeps the others informed.			
<b>2.8 Monitoring requirements are fulfilled for production in low-risk countries.</b>	Yes	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.
<b>2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)</b>	Not applicable	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.

<b>2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)</b>	Not applicable	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.

**Monitoring Comments:**

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# Complaints Handling

Basic Measures		Comments
Number of worker complaints received since last check.	1	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.	1	
Number of worker complaints resolved since last check.	0	

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>3.1 A specific employee has been designated to address worker complaints.</b>	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: Schöffel has a designated person to follow up complaints. The procedure to follow up complaints exists in written.		
<b>3.2 System exists to check that the Worker Information Sheet is posted in factories.</b>	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.
	Comment: Every supplier has to fill in a form where the code was posted, who has been informed on the code and pictures need to be included showing that the code is hung up at a place visible and readable for the workers. Until now Schöffel does not check whether the complaint's handler name and number is therefore recommended to be included in the checks of the postings.		
<b>3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline.</b>	33%	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.

	<p>Comment: Almost all audit reports show that the Code of Labour Practice is hung up at the production sites. However lot of workers have not been aware of the content of the CoLP.</p> <p>Recommendation: Due to the audit report findings, it is recommended to find a system to ensure that workers' code awareness rises.</p> <p>Comment: First steps are taken by including production sites to the FWF workplace education programme.</p>		
<b>3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure.</b>	Yes	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.
	<p>Comment: Solving complaints has been pro-active, joining with other customers of the production site (no matter if FWF member or not) and offering training possibilities. Schöffel even invested in a complaint which was filed but taken back during investigation of FWF.</p> <p>Recommendation: Recommendation is to add a root cause analysis for the complaints to not happen again in a broader sense.</p>		
<b>3.5 Cooperation with other customers in addressing worker complaints at shared suppliers</b>	Active Cooperation	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.

### Complaints Comments

Schoeffel has a policy and strategy to follow in case of complaints. The system is also shared with the suppliers.

## Training & Capacity Building

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>4.1 Staff at affiliate is made aware of FWF membership requirements.</b>	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: Regular trainings are given by CSR responsible to different staff. Presentations and discussions are made in a way addressing specifically the targeted audience.		
<b>4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements.</b>	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.
	Comment: All staff is well informed and travels regularly to the suppliers. Briefings take place on a regular basis amongst the staff in direct contact with suppliers as well as the CEO and COO. Travelling staff is well briefed and topics for discussion on social standards		
<b>4.3 Agents are informed of CoLP requirements and act to support their implementation.</b>	Not applicable	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.
<b>4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume).</b>	15%	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.
	Comment: One factory producing for Schöffel joined the Workplace Education Programme in 2012.		
<b>4.5 Factory participation in trainings (where WEP is not offered; by production volume).</b>	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.

Recommendation: Management of 71% of the production sites have been trained by Schöffel on FWF and CoLP. However the FWF training standards foresee that apart from management, line supervisors and workers have to be trained as well. The training of only factory management could not be counted here but is a great effort done by Schöffel which could be used as a base for further trainings with line supervisors and workers at the factory premises in 2013.
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### **Training & Capacity Building Comments**

Schöffel took the recommendations from the brand performance check 2012 seriously into account and established factory based management trainings. At one production site the FWF workplace education programme has been conducted in 2012, more suppliers agreed already to the programme for 2013.
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# Information Management

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>5.1 Supplier register for the previous financial year is verified as being complete and accurate.</b>	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.
<b>5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers.</b>	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: All interviewed Schöffel staff were well informed. Additional store checks showed that personal in Schöffel stores know about FWF membership and can guide the interested customer to information in e.g. catalogues, shop displays or internet.			

## Information Management Comments:

FWF audit reports did not conclude that production takes place at subcontractors which Schöffel is not aware of. Conclusion from existing reports is therefore that subcontractors are listed correctly in the supplier register. However it needs to be mentioned that with most of the production sites Schöffel is in direct contact and in cases where production takes place at more than one site, the information is well listed.

# Transparency

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>6.1 Communication about FWF membership adheres to the FWF communications policy.</b>	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.
	Comment: Aside the information on the website and the catalogue, FWF information is also included in displays in the show rooms, in catalogues and in the product information guideline for sales staff. Schöffel is also eager to use FWF on-garment communication (when allowed).		
<b>6.2 Affiliate engages in advanced reporting activities.</b>	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.
	Comment: Schöffel sees it as their company responsibility to share the content of FWF and to communicate FWF membership. Customer requests rise.		
<b>6.3 Social Report is submitted to FWF and is published on affiliate's website</b>	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.

## Transparency Comments:

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# Evaluation

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.</b>	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: Schöffel meets annually with all department managers and head of the company. FWF is an integrated part of the annual meeting. Additionally meetings with staff in direct contact with suppliers take place every three months.		
<b>7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate.</b>	N/A	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:

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## Comments to FWF

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

Schöffel wishes FWF members to share more actively audits and CAPS. Also FWF requested to work more closely with other organisations in sharing information especially audit reports as work sometimes duplicates at suppliers due to different standards. Schöffel likes the informative and plain communication materials which are based on facts and the FWF process approach. Schöffel would appreciate positive story telling (e.g. statements, pictures) to show the customers good examples of production (aside the negative and shocking pictures of e.g. burned down factories in the news).

## Appendix 1: FWF Audit Finding Summary by Country

This chart summarizes the number of time each finding was reported during an FWF Audit in each country.

	China	Turkey	Vietnam
<b>Total Number of Audits:</b>	<b>3</b>	<b>1</b>	<b>2</b>
<b>Standard Findings</b>			
<b>Sourcing practices</b>			
According to the supplier the prices of the affiliate do not support the payment of living wages.	3	1	2
<b>Monitoring system</b>			
No areas for improvement	3	1	2
<b>Management system of factory to improve working conditions</b>			
No areas for improvement	2	1	2
Other	1: Factory has never reported social standard practices to Schöffel		
<b>Communication and consultation</b>			
Management has not informed workers actively about the FWF Code of Labour Practices and / or relevant national or local legislation.	1	1	
There is no effective internal grievance mechanism in place.	2	1	
No areas for improvement	1		
Other	2: CoLP is not communicated to subcontractors.		2: CoLP is not communicated to subcontractors.
<b>Employment is freely chosen</b>			
No areas for improvement	3	1	2
<b>No discrimination in employment</b>			

Discrimination against a number of workers is found. Discrimination addressed:			1: age of workers; 1: Recruitment policy states age of workers to be hired.
No areas for improvement	3	1	
<b>No exploitation of child labour</b>			
The factory employed juvenile workers without following local regulations to protect these workers.			2
No areas for improvement	3	1	
<b>Freedom of association and the right to collective bargaining</b>			
The factory infringes workers' rights to organise.			1
There is no independent workers' organisation or union, which is run by workers without management's involvement.	2		
No areas for improvement		1	
Other	1: Workers are not aware of their rights of FoA.		1: Work rules have not been registered. Some workers have been dismissed without verification meeting.
<b>Payment of a living wage</b>			
Wages are below living wage level as estimated by local stakeholders.	3	1	2
The factory delays paying workers' wages.	1		
The factory does not pay leaves and benefits to workers according to legal requirements.	2		2
The factory does not pay overtime premium to workers according to legal requirements.	2		
<b>Reasonable hours of work</b>			

Overtime is not voluntary or it is not announced in advanced		1	
The factory is not transparent regarding overtime records.	1	1	
Excessive overtime was found:	3: too many working hours + partly seven days work in a row without day off		2: too many working hours + partly seven days work in a row without day off
<b>Safe and healthy working conditions</b>			
Critical/minor issues regarding fire safety are found	2	1	2
Critical/minor issues regarding chemical safety are found	1		
Critical/minor issues regarding ergonomics are found	3		
Other:		1: Use of PPE	1: Use of PPE
<b>Legally binding employment relationship</b>			
The factory does not provide contracts or appointment letters to workers.		1	
Content of employment contracts does not comply with legal requirements.		1	
Not all social security or insurance fees are paid	3		
Other			2