

BRAND PERFORMANCE CHECK

Vaude Sport GmbH & Co. KG

PUBLICATION DATE: JULY 2014

this report covers the evaluation period 01-01-2013 to 31-12-2013

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 <u>Brand Performance Check Guide</u> provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK OVERVIEW

Vaude Sport GmbH & Co. KG

Evaluation Period: 01-01-2013 to 31-12-2013

| AFFILIATE INFORMATION | |
|---|---|
| Headquarters: | Tettnang, Germany |
| Member since: | 15-11-2010 |
| Product types: | Sportswear, Outdoor |
| Production in countries where FWF is active: | Bulgaria, China, Lithuania, Tunisia, Viet Nam |
| Production in other countries: | Austria, Germany, Korea, Myanmar |
| BASIC REQUIREMENTS | |
| Workplan for this evaluation period 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 | 72% |
| Benchmarking score | 78 |
| Category | Good |

Summary:

Vaude has strong internal systems which lead to a high benchmarking score, however only 72% of production volume was under monitoring in 2013, short of the 90% requirement for brands at 3+ years of membership. The low monitoring score is linked to a process of reducing the number of suppliers, something FWF encourages. This activity, combined with the high score, has lead FWF to award Vaude a 'Good' rating for 2013, with the provision that it must reach the 90% monitoring threshold in 2014.

Vaude has established strong, integrated systems at company level. Due to full-time staff in Asia and frequent travels from Europe to the production sites, Vaude's CSR team has in-depth knowledge about its production sites. Monitoring and remediation of findings at the production sites is a joint effort of all staff in close contact to the production sites.

A wage analysis using FWF audit reports and wage ladders showed that wages at Vaude's production sites are on average 50% higher than legal minimums in China and 100% higher in Vietnam. In both countries, average wages at these suppliers are approaching Asia Floor Wage, with an approximately 20% differential remaining. In 2012/13, Vaude participated in a FWF study with other outdoor companies to assess the impact of hypothetical increases towards living wage benchmarks.

All five complaints filed by workers were followed up on immediately and appropriately; two have been resolved and three are still under investigation. Vaude has taken the lead in following up corrective actions and complaints at shared suppliers with other FWF affiliates. Several of Vaude's production sites have participated in FWF's Workplace Education Programme.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates who are doing exceptionally well, and are operating at an advanced level.

Good: It is FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Affiliates may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Affiliates who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Affiliates may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

1. PURCHASING PRACTICES

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|---|--------|---|---|-------|-----|-----|
| 1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity | 67% | Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes. | Supplier information provided by affiliate. | 3 | 4 | 0 |

Comment: In 2012/13 Vaude consolidated its supplier base. Further consolidation is planned for 2014.

| 1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years | 70% | Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. | Supplier information provided by affiliate. | 3 | 4 | 0 | |
|--|-----|--|---|---|---|---|--|
|--|-----|--|---|---|---|---|--|

Comment: The percentage of production volume from suppliers where a business relationship has existed for at least five years is 70%.

| 1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed. | No new suppliers | 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. | N/A | 2 | 0 | |
|--|------------------|---|---------------------------|-----|---|---|--|
|--|------------------|---|---------------------------|-----|---|---|--|

Comment: No new supplier has been added in the past financial year. The Code of Labour Practices is included in the general requirement which all suppliers have to sign at the beginning of the cooperation.

| 1.4 Company conducts human rights due diligence at all new suppliers before placing orders. |
|---|
|---|

Comment: When a new supplier is needed Vaude has a questionnaire which includes general questions on social audits in the past and includes the FWF health and safety checklist.

| 1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner | Yes, and performance 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. | 2 | 2 | 0 | |
|---|--|--|---|---|---|---|--|
|---|--|--|---|---|---|---|--|

Comment: Suppliers are evaluated twice a year together with all Vaude staff involved with the manufacturers. This evaulation includes social standards and is shared with the supplier on a yearly basis when visiting the production site or on fairs when suppliers are in Europe. Evaluation of suppliers together with top management takes places once a year in addition to the other evaluation meetings.

The supplier's performance on social standards is part of the decision making which lead in the consolidation plan of Vaude. Hence there is a natural way of rewarding suppliers by continuing with suppliers who perform well.

| 1.6 The affiliate's production planning systems support reasonable working hours. | Strong, integrated systems in place. | Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories. | Documentation of robust planning systems. | 4 | 4 | 0 | |
|---|--------------------------------------|---|---|---|---|---|--|
|---|--------------------------------------|---|---|---|---|---|--|

Recommendation: Production capacity according to a supplier can include excessive overtime. Vaude is recommended to check that production capacity alligns with regular working hours.

Comment: Vaude has a strong, integrated system in place. Approx. nine months before delivery, Vaude and the supplier agree on the production capacity and how many pieces of what style will be produced when. This forceast is agreed upon with the supplier according to their capacity. Final orders (which come straight after agreeing on the forecast) are binding and not changed.

| 1.7 Degree to which affiliate mitigates root causes of excessive overtime. | Advanced efforts | Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime. | Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes. | 6 | 6 | 0 | |
|--|---------------------|--|---|---|---|---|--|
|--|---------------------|--|---|---|---|---|--|

Comment: If overtime takes place this is usually raised by Vaude's Asian QC staff who often visit the factories. Generally Vaude addresses the root cause of excessive overtime with suppliers.

A root cause analysis of overtime at the production sites in 2012 showed that excessive overtime is a result of fabric and trim delays. Since then, Vaude has an own department which addresses fabric and trim orders and delays together with the supplier. In 2013 focus was on apparel following all other production groups step by step in 2014.

The production of Vaude products to be sold in summer 2014 showed first results as less fabric delays have been reported by the suppliers / Vaude purchasing team.

| 1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries. | Style-level policy | The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour pasts of garments. | Formal systems to calculate labour costs on per-product | 4 | 4 | 0 | |
|--|-----------------------|--|---|---|---|---|--|
| | | the labour costs of garments. | or country/city level. | | | | |

Comment: Vaude takes local minimum wages into account during product pricing. The company has a formal costing system per style.

| 1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages. | Yes | 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. | 1 | 2 | -2 | |
|---|-----|--|---|---|---|----|--|
|---|-----|--|---|---|---|----|--|

Comment: One of several audits conducted by FWF in 2013 at Vaude's production sites showed fail to pay legal minimum wages. After discussing this issue with the supplier, Vaude requested FWF to conduct another audit just three months later and to verify that the wages have increased to at least minimum wages. Documents and salaries have been checked accordingly and wages have increased to at least minimum wages.

| 1.10 Evidence of late p | ayments to suppliers by | No | Late payments to suppliers can have a | Based on a complaint | 0 | 0 | -1 |
|-------------------------|-------------------------|----|--|-------------------------|---|---|----|
| affiliate. | | | negative impact on factories and their ability | or audit report; review | | | |
| | | | to pay workers on time. Most garment workers | of factory and | | | |
| | | | have minimal savings, and even a brief delay | affiliate financial | | | |
| | | | in payments can cause serious problems. | documents. | | | |

Comment: Vaude has a workflow to pay suppliers right after the final report from local quality control staff. None of the FWF audit reports showed evidence of late payments to suppliers by Vaude.

| 1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages. | Supply chain approach | Sustained progress towards living wages requires adjustments to affiliates' policies. | Documentation of policy assessments and/or concrete progress towards living wages. | 6 | 8 | 0 | |
|---|-----------------------|---|--|---|---|---|--|
|---|-----------------------|---|--|---|---|---|--|

Comment: In 2013, Vaude has compared FWF wage ladders from various factories, in China and Vietnam (main production countries for Vaude). A detailed analysis has been made using audit report results from 2012 and 2013. Payments according to the FWF wage ladders in the production sites in China and Vietnam have been compared to local minimum wages and Asia Floor Wage benchmarks. This analysis showed that factories of Vaude pay on average 50% higher than minimum wage in China and 100% higher than minimum wage in Vietnam. In both countries wages were max. 20% lower than the Asia Floor Wage benchmarks. Vaude will concentrate in 2014 to improve wages of departments and workers which are lowest.

In 2012/13, Vaude participated in FWF's project with various outdoor companies to assess the impact of

Through this engagement, the company shows that it is committed to working towards implementation of living wages.

hypothetical increases towards living wage benchmarks.

| 1.12 Affiliate sources from an FWF factory member. No When possible, FWF encours source from FWF factory member of the small number of fact 'bonus' indicator. Extra point the indicator will not negating affiliate's score. | embers. On account provided by affiliate. ories this is a ts are possible, but | N/A | 1 | U |
|---|--|-----|---|---|
|---|--|-----|---|---|

| 1.13 Percentage of production volume from factories owned by the affiliate. | 20% | Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score. | Supplier information provided by affiliate. | 1 | 2 | 0 | |
|---|-----|---|---|---|---|---|--|
|---|-----|---|---|---|---|---|--|

Comment: Vaude owns 2 factories where backpacks are made; one in China and one in Vietnam.

PURCHASING PRACTICES

Possible Points: 36

2. MONITORING AND REMEDIATION

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|---|--------|--|
| % of own production under standard monitoring (excluding low-risk countries) | 66% | |
| % of own production in low risk production countries where FWF's Low Risk policy has been implemented | 6% | FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries. |
| Total of own production under monitoring | 72% | Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover. |

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|--|---|-------|-----|-----|
| 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 | -2 |

Comment: Vaude works with FWF trained audit teams to monitor working conditions in factories. The company has a designated person in Germany and another full time staff in China to coordinate the CAP follow up process. In addition, Vaude QC staff frequently visits the production locations and have shared responsibility to follow up on problems identified by monitoring system.

| 2.2 Degree of progress towards resolution of existing Corrective Action Plans | Intermediate | 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. | 4 | 8 | -2 | |
|---|--------------|---|---|---|---|----|--|
|---|--------------|---|---|---|---|----|--|

Comment: Findings of all audit reports are discussed with all factories. Audit reports are shared and timelines for implementation agreed upon. Approx. 3-4 months after the audit, Vaude requests feedback from factories on the status of implementation. The feedback from the factory management is cross-checked by Vaude's local QC staff who visits the productions sites regularly. Worker interviews are conducted to verify whether the statement of implementation from factory management is correct. In case the factory management response varies from the answers from the workers, Vaude CSR staff from Germany discusses this discrepancy during one of the visits to ensure the fatcory management takes CAP implementation serious. The process of implementation of all CAPs is analysed per factory on a yearly basis. This analysis is discussed

with the factory management during factory visits.

| 2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year | 93% | visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the | document all factory visits with at least the date and name of | 4 | 0 | |
|---|-----|---|--|---|---|--|
| | | Code of Labour Practices. | the visitor. | | | |

Comment: Production sites are visited each year several times by Vaude staff. This counts especially for all production sites in China, Vietnam and Myanmar.

| 2.4 Existing audit reports from other sources are collected. | 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. Reports of quality assessments. | 2 | 3 | 0 | |
|--|--------------------------|---|--|---|---|---|--|
|--|--------------------------|---|--|---|---|---|--|

Recommendation: Existing audit reports in good quality can be used for implementation of findings rather than auditing the factory again.

Comment: Vaude collects available audit reports from suppliers and conducts the FWF audit quality assessment tool. Results of this analysis are shared with FWF for preparation of audit teams before conducting a new audit. Audit reports from other sources are not followed up yet in an active manner.

| 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 2 Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc. | 2 | -1 |
|--|-----|---|--|---|----|
|--|-----|---|--|---|----|

Comment: Audit reports and corrective action plan findings are shared with factory. Improvement timelines are established in a timely manner.

| | ermediate pacity | Different countries and products have different risks associated with them; monitoring systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain. | Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc. | 3 | 6 | 0 | |
|--|---------------------|--|--|---|---|---|--|
|--|---------------------|--|--|---|---|---|--|

Recommendation: Vaude is recommended to conduct a root cause analysis for those findings and to find ways how to prevent such findings from happening in the future at the production sites where the problems occured as well as preventive at production sites where those problems could occur.

Comment: Vaude complies with FWF's Myanmar policy. Vaude produces in Myanmar since they joined FWF membership and followed up production in this high risk country together with FWF closely. An analysis of all audit reports in China and Vietnam has shown that most problems at the production sites occur within the standards health & safety and communication & consultation.

| 2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers 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. | 2 | 2 | -1 | |
|---|---|---|---|---|----|--|
|---|---|---|---|---|----|--|

Comment: Vaude shares audits and CAPs with other customers of the production site. Typically one of the members takes initiative in coordinating the CAP follow up process and keeps the others informed. Vaude took the lead to follow up CAPs in some of the audits.

| production in low-risk countries p | 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 | 2 | 0 |
|------------------------------------|---|---|---|---|---|
|------------------------------------|---|---|---|---|---|

Comment: The amount of production sites and also the turnover at production sites in low-risk countries is below 6%. Monitoring requirements are fulfilled for production in low-risk countries.

| 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. | N/A | 3 | 0 |
|--|------------------------------|--|---|-----|---|---|
| 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. | N/A | 3 | 0 |

MONITORING AND REMEDIATION

Possible Points: 29

3. COMPLAINTS HANDLING

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|--|--------|--|
| Number of worker complaints received since last check | 5 | 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 | 3 | |
| Number of worker complaints resolved since last check | 2 | |

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|--|---|-------|-----|-----|
| 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. | 1 | 1 | -1 |

Comment: Both CSR responsibles at Vaude in Germany and Asia are responsible for handling complaints. Both travel to the production sites frequently and see addressing worker complaints as a shared responsibility which is best addressed face-to-face with the factory management.

| 3.2 System exists to check that the Worker Information Sheet is a key first step in alerting workers to their rights. | t Photos by company staff, audit reports, checklists from factory visits, etc. | 2 | 2 | 0 |
|---|--|---|---|---|
|---|--|---|---|---|

Comment: Local Vaude staff visits the production sites regularly. Checking the posting of the worker information sheet is part of every visit.

| 3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline. | 42% | 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. Factory participation in the Workplace Education Programme also count towards this indicator. | Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme. | 2 | 4 | -2 | |
|--|-----|--|--|---|---|----|--|
|--|-----|--|--|---|---|----|--|

Comment: Some of the audit reports showed that at least half of the workers are aware of the FWF worker helpline. Some factories of Vaude have participated in the FWF workplace education programme. Aside other topics, workers have been trained on grievance mechanisms and are now aware of the FWF worker helpline.

| 3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure | Yes | Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues. | Documentation that affiliate has completed all required steps in the complaints handling process. | 6 | -2 | |
|--|-----|---|---|---|----|--|
|--|-----|---|---|---|----|--|

Recommendation: Vaude is recommended to take extra steps and efforts to prevent the problems from recurring at other factories with likely similar problems.

Comment: All complaints received from factory workers were addresses in accordance with the FWF Complaints Procedure by the CSR staff in Germany and Asia. Vaude's standard complaints procedure includes a process to understand root causes of the complaints every time a new complaint is filed.

| 3.5 Cooperation with other customers in addressing worker complaints at shared suppliers | Active cooperation | Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical | Documentation of joint efforts, e.g. emails, sharing of | 2 | 2 | -2 | |
|--|-----------------------|--|---|---|---|----|--|
| | | in resolving a complaint at a supplier. | complaint data, etc. | | | | |

Comment: Two out of five complaints received have been at a shared production site with another FWF affiliate. Vaude has actively cooperated with the other FWF affiliate in addressing the worker complaints at the shared supplier.

COMPLAINTS HANDLING

Possible Points: 15

4. TRAINING AND CAPACITY BUILDING

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|--|--|-------|-----|-----|
| 4.1 All staff 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. | 1 | 1 | -1 |

Comment: FWF information can be found online, all staff at Vaude has access to the FWF documents on the company's server.

Staff at Vaude is made aware of FWF membership in several ways:

The Vaude Academy offers two sessions about social standards and Fair Wear Foundation every year. All employees of Vaude are free to join Vaude's Academy programme. The programme is mandatory for new staff. Every summer there is a sales meeting where sales staff is trained. FWF membership is always on the agenda. In addition news on current happenings (such as the new FWF policy to source in Myanmar). Updates on social standards are part of the monthly meetings with the head of the product departments. Vaude's top management is informed and updated on a yearly basis.

| 4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers. | 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. | 2 | 2 | 0 | |
|--|-----|--|---|---|---|---|--|
|--|-----|--|---|---|---|---|--|

Comment: No additional training is needed aside Vaude Academy. All staff in direct contact with suppliers are involved in the follow up of FWF's monitoring systems. Weekly meetings take place to ensure that everybody is aware of current happenings.

Vaude will train it's Asian staff on health and safety in 2014 to enable them better to detect health & safety violations at the production sites which they visit frequently for quality checks.

| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. | 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. | N/A | 2 | -2 | |
|--|-------------------------------------|---|---|-----|---|----|--|
|--|-------------------------------------|---|---|-----|---|----|--|

Comment: Vaude keeps direct contact with its suppliers.

| sustainable improvements. Programme. | E | 4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume) | 28% | Lack of knowledge and skills on best practices related to labour standards is acommon 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 | 4 | 6 | 0 | |
|--------------------------------------|---|---|-----|--|---|---|---|---|--|
|--------------------------------------|---|---|-----|--|---|---|---|---|--|

Comment: Three factories have participated in FWF's Workplace Education Programme in 2013. All factories were open for the training and reported that the training was useful. They wish for more follow up possibilities after the training and trainings which go beyond labour standards and grievance mechanisms addressing factory specific needs.

| 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 or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator. | Curricula, other documentation of training content, participation and outcomes. | 0 | 4 | 0 |
|---|----|--|---|---|---|---|
|---|----|--|---|---|---|---|

Recommendation: It is recommended to start finding ways on how to ensure that workers are trained on labour rights in production countries where WEP is not offered.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

5. INFORMATION MANAGEMENT

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|---|----------|---|--|-------|-----|-----|
| 5.1 Level of effort to identify all production locations and update supplier information. | Advanced | Any improvements to supply chains require affiliates to first know all of their suppliers and production locations. | Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities. | 6 | 6 | -2 |

Comment: Vaude staff is regularly at the production sites. Especially Asian QC staff is at the fatcories during production frequently. None of the audit reports indicated subcontractors in use for Vaude production.

| 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. | 1 | 1 | -1 |
|--|-----|--|---|---|---|----|
|--|-----|--|---|---|---|----|

Comment: Everybody at Vaude has access to the server where all information with regard to labour conditions at the production sites are filed. Information is shared explicitly with staff in contact with production sites after receival of news.

INFORMATION MANAGEMENT

Possible Points: 7

6. TRANSPARENCY

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|---|--------|---|---|-------|-----|-----|
| 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. | 1 | 1 | -2 |

Comment: Communication about FWF membership adheres to the FWF communication policy. Vaude has produced a video filming the companies production at a supplier in China including interviews with FWF's Chinese audit supervisor, factory management, Vaude's CEO and FWF staff. This seven minute video has been broadcasted during fairs, at the Vaude headquarter, online and during several meetings/trainings. FWF information is also disributed via social media e.g. facebook and youtube.

| 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. | 1 | 1 | 0 |
|--|-----|---|---|---|---|---|
|--|-----|---|---|---|---|---|

Comment: Vaude includes the results of the brand performance check in its sustainability report which is shared in printing and online. The sustainability report is according to GRI standards.

| 6.3 Social Report is submitted to FWF and is | Published on | The Social Report is an important tool for | Report adheres to | 2 | 2 | -2 | ı |
|--|--------------|--|------------------------|---|---|----|---|
| published on affiliate's website | affiliate's | brands to transparently share their efforts with | FWF guidelines for | | | | ı |
| | website | stakeholders. | Social Report content. | | | | ĺ |

Comment: The social report of Vaude is submitted and published on Vaude's website as part of the sustainability report.

TRANSPARENCY

Possible Points: 4

7. EVALUATION

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|---|--|-------|-----|-----|
| 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. | 2 | 2 | 0 |

Comment: Top management is involved to systematically evaluate FWF membership on a yearly basis.

| 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. | 8 | 8 | -4 | |
|---|------|---|--|---|---|----|--|
|---|------|---|--|---|---|----|--|

EVALUATION

Possible Points: 10

RECOMMENDATIONS TO FWF

- 1. Due to several shared audits and CAPs, Vaude asks FWF to enhance clarity on what is asked from a brand which takes the lead with regard to remediation of audit report findings.
- 2. Vaude would appreciate FWF to ensure brands involved in the same audit/complaint to be informed in a structured manner.
- 3. Vaude would like FWF to write training reports which the brand could follow up upon.
- 4. WEP offers in Vietnam would be appreciated.

SCORING OVERVIEW

| CATEGORY | EARNED | POSSIBLE |
|--------------------------------|--------|----------|
| Purchasing Practices | 30 | 36 |
| Monitoring and Remediation | 21 | 29 |
| Complaints Handling | 10 | 15 |
| Training and Capacity Building | 7 | 13 |
| Information Management | 7 | 7 |
| Transparency | 4 | 4 |
| Evaluation | 10 | 10 |
| Totals: | 89 | 114 |

BENCHMARKING SCORE (EARNED POINTS + POSSIBLE POINTS)

78

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

06-03-2014

Conducted by:

Stefanie Santila Karl

Interviews with:

Jan Lorch, International Sales & General Manager Susanne Medesi, Head of production management & CSR

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.