



BRAND PERFORMANCE CHECK

Jack Wolfskin

PUBLICATION DATE: SEPTEMBER 2016

this report covers the evaluation period 01-10-2014 to 30-09-2015

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of 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. They evaluate the parts of affiliate supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

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.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with affiliate employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Jack Wolfskin

Evaluation Period: 01-10-2014 to 30-09-2015

AFFILIATE INFORMATION	
Headquarters:	Idstein/Ts., Germany
Member since:	01-07-2010
Product types:	Outdoor
Production in countries where FWF is active:	Bangladesh, China, Turkey, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Cambodia, Indonesia, Italy, Republic of Korea, Myanmar, Slovenia, Taiwan, Thailand
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	100%
Benchmarking score	87
Category	Leader

Summary:

Jack Wolfskin meets most of FWF's management system requirements and goes beyond several. It has 100% of its supply chain monitored, hence meets the monitoring threshold of 90% for this financial year.

Jack Wolfskin has build up close partnerships with its main suppliers which allows them to cooperate and work effectively on remediation of monitoring findings. Jack Wolfskin works closely with an external auditing company, which audits its suppliers frequently.

Jack Wolfskin has engaged in advanced public reporting. Its direct supplier list is published online, allowing a high degree of transparency. In addition, the Brand Performance Check has been published on its website.

Jack Wolfskin has started to promote participation in FWF's Workplace Education Programme (WEP). Several suppliers have joined in this evaluation period. FWF recommends Jack Wolfskin to keep motivate its suppliers to join the WEP aiming at improving social dialogue and preventing gender-based violence at factory level.

With four complex complaints received in the last evaluation period, Jack Wolfskin has shown great efforts in complaints handling involving well the factory management and worker as well as stakeholders on various levels.

FWF expects Jack Wolfskin to take a more pro-active role in discussing living wages with its suppliers. It could proceed with its efforts at one or more main suppliers where it has a high leverage, to start discussing how to move up the wage ladder towards living wages, possibly in a joint effort with other (FWF member) buyers. Jack Wolfskin is also advised to look more closely into the root causes of overtime with its suppliers and seek joint approaches to tackle these causes.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

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	64%	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 this evaluation period, Jack Wolfskin bought at least 10% of production capacity from 64% of its suppliers. In the previous evaluation period, it had been 78%. The reduced percentage is mainly due to the fact that some suppliers added subcontractors while at the same time new products have been introduced. Jack Wolfskin started relationships with new production locations for these products.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	66%	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
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Comment: Two thirds of the production volume is bought at suppliers with whom Jack Wolfskin has a business relation which exists for at least 5 years.

1.3 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.	2	2	0
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1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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Comment: Jack Wolfskin follows an assessment process and evaluation system for selecting new suppliers. Technicians and sourcing staff are usually the ones traveling to the production site already at a very early stage. They are informed well about CSR issues and what needs extra checking for example via the OHS checklist. Sometimes Jack Wolfskin commissions a test order before an independent 3rd party audit is scheduled, but bigger orders are placed only after an own social audit.

In addition to the 3rd party audits, Jack Wolfskin collects and evaluates existing audit reports. The supplier evaluation includes topics like technical skills of a supplier, their communication, social compliance aspects, product development, purchasing etc. Representatives of different departments (including CSR) are part of the rating process. The final decision if a new supplier is ready to produce for Jack Wolfskin is made in these meetings based on the assessment.

In general, Jack Wolfskin aims to limit the selection of new suppliers to countries they already source from, for example decided actively against sourcing from Ethiopia for now after conducting a country due diligence.

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
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Comment: Jack Wolfskin has a supplier rating system. Supplier evaluation is done after production for each season (twice a year) and used for future sourcing decisions. For this also the progress over various years is evaluated. Results are shared with the suppliers.

Jack Wolfskin could show it increased orders at a supplier performing well. However, whether it is possible to increase orders, also depends on the product production needed and the acceptance of a larger order by the supplier itself.

Existing suppliers from the past with a low score, who may not have passed current human right due diligence standards of Jack Wolfskin for new suppliers, are more intensively monitored and efforts put in place to improve. Jack Wolfskin stopped sourcing at a Chinese supplier in 2014, which scored low in the rating system, and did not show willingness to improve.

The whole rating system is based on a traffic light system. In case a supplier is rated "red", the supplier is informed and special care for this supplier is given. CSR has a veto right in case social standards are not improving even if a supplier performs well in other categories.

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
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Comment: Jack Wolfskin showed to have an elaborate planning system, with order forecasting per season. The brand sees fabric availability, quality and delays as a issues of concern when it comes to overtime hours at the production site.

In 2015, Jack Wolfskin did not have late changes in orders and pre-orders of fabric and placed the orders for fabric well in advance before the 1st order to the garment supplier. Further, Jack Wolfskin takes holiday periods like Chinese New Year and Ramadan into account when planning production and fabric delivery. Since Jack Wolfskin is working with independent factories, the brand has no control over the internal factory production planning. However, the brand asks the factory management to calculate with 8 working hours per day (instead of 10 working hours which include already 2 overtime hours). Jack Wolfskin further checks the actual production situation with each factory twice a month. This is to be able to react early in case of problems during production or delivery delays. In case needed a.o. to avoid excessive overtime, Jack Wolfskin offers to split orders.

In addition, Jack Wolsfkin offered training on production planning systems. Traveling staff such as technicians try to provide guidance whenever visiting the production site.

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
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Recommendation: Jack Wolfskin is recommended to continue the dialogue with suppliers on the root causes of excessive overtime, provide support to manage overtime, and discuss the merit of realistic production planning on the side of the supplier. Where possible, and facing similar challenges, Jack Wolfskin is recommended to seek cooperation with other buyers at shared suppliers, to seek joint approaches where possible on causes of overtime.

Comment: FWF conducted five audits at production sites of Jack Wolfskin in this evaluation period. 3 in China, 1 in Myanmar and another in Vietnam. The audits concluded no overtime at two of the production sites, excessive overtime at two sites and intransparent records at the fifth production site. Jack Wolfskin reports that even well structured factories sometimes ask the brand to approve overtime during a certain period (peak season). The brand asks to stay within the legal framework and not to conduct overtime on a regular basis. Documents need to be well maintained to proof that needed overtime is paid as per law. In 2015 Jack Wolfskin has given a production planning training to suppliers in China and Myanmar which has been well received but did not change much in daily routines. Most important for Jack Wolfskin is that the factory management understands the importance of this topic and is able to change their own mindsets.

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 costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	4	4	0
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Recommendation: Jack Wolfskin is recommended to increase their understanding of labour costs per product. This forms the basis for making steps towards living wages. Jack Wolfskin could start piloting to find out the additional cost of paying a living wage and defining steps up the wage ladder with (one) of its main supplier(s). FWF's report on labour minute costing offers guidance on this process. For this pilot, it could proceed with its efforts started with one supplier in China, and/or a main supplier shared with other outdoor brands member of FWF and seek cooperation in a joint pilot.

Comment: Jack Wolfskin has advanced and detailed shared cost calculation with vendor / supplier, per style, based on fabrics and trimmings. The brand's calculation estimate is compared to the supplier calculation after which the price is negotiated on the CMT part (this includes factory costs of overhead which are not known to Jack Wolfskin, and estimate of working minutes needed per product). The vendor control department provides information on minimum wage levels to purchasing to include in the cost estimation of the CMT part. Jack Wolfskin does not know the exact cost of labour, since labour cost per garment is included in the CMT package and is not specified.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	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.	2	2	-2
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Comment: None of the FWF audits conducted in this evaluation period showed suppliers fail to pay legal minimum wages.

1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1
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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.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0
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Recommendation: FWF encourages the affiliate to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder and discuss with suppliers about possibilities to work towards higher benchmarks. Jack Wolfskin could proceed with its efforts at one or more main suppliers, where it has a high leverage, to start discussing how to move up the wage ladder towards living wages, possibly in a joint effort with other (FWF member) buyers.

Comment: All FWF audits concluded wages below living wages. In two out of five audits, FWF audit teams concluded that the workers do not understand how their wages are calculated. In two factories workers complain about low wages. Suppliers of all production sites audited state that the prices paid by the FWF affiliate do not support living wages.

In 2014, Jack Wolfskin supported a supplier with consultancy on productivity improvements to create space for increasing wages, though not systematically, and not towards living wage benchmarks. Jack Wolfskin has not revised its overall pricing policy to move towards living wages in the last evaluation period. In Myanmar, Jack Wolfskin pays a price which makes payment of living wages possible, however Myanmar is the only country with no minimum wage determination.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories 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.	N/A	1	0
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1.13 Percentage of production volume from factories owned by the affiliate.	None	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.	N/A	2	0
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PURCHASING PRACTICES

Possible Points: 40

Earned Points: 34

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	99%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	1%	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	100%	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
2.2 Degree of progress towards resolution of existing Corrective Action Plans	Advanced	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.	8	8	-2

Comment: Jack Wolfskin conducts frequent audits at its suppliers and monitors follow up closely. Progress of suppliers is generally monitored at least once a year. This is done either by CSR staff or the audit company Sumations, which received training by FWF. In its supplier rating and overview system, reminders pop up on corrective actions that need following up.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	100%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	4	4	0
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2.4 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0
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Comment: Jack Wolfskin merges the corrective action plans of audits implemented by Sumations and FWF, when both are available.

Sourcing staff, when visiting potential new suppliers, collect other third party audit reports. CSR staff assesses the quality of these reports. Sumations audits are implemented during the testing phase, before orders are placed and after.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1
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Comment: Proof was shown that corrective action plans are shared and signed by the supplier representatives. Improvement timelines are established in a timely manner. This counts for FWF audits as well as audits conducted by Sumations teams.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Advanced Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted 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.	6	6	0
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Recommendation: Overall/integrated risk for the textile industry is gender discrimination and violence against women. Jack Wolfskin is recommended to expand their efforts including above mentioned risks.

Comment: Thailand: Jack Wolfskin was monitoring the high risk issues in the Maesot area in Thailand. There has been a complaint in 2014 which was closed in 2015 after Jack Wolfskin has paid money to support factory management to pay severance payments.

Turkey: A small amount of Jack Wolfskin's production comes from Turkey where Syrian refugees have become an issue in the labour market recently. The Turkish supplier of Jack Wolfskin responded that Syrian refugees are not employed at the factory. Nevertheless, Jack Wolfskin has informed them sending relevant documents. Additionally, Jack Wolfskin signed a joint letter that FWF and other organizations wrote to Turkish government in order to get Syrian refugees legalized. An audit in September 2015 concluded that no Syrian refugees are employed at the production site.

China: Freedom of Association is an issue along the supply chain in most of the production countries. Training such as the Workplace Education Programme have been focusing on this matter.

Italy: A supplier in Italy is monitored carefully to mitigate the risk of Chinese workers in Italian factories - which were not found at Jack Wolfskin's suppliers so far.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Advanced Capacity	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	3	3	0
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Recommendation: Jack Wolfskin is recommended to address not only fire and building safety with suppliers in Bangladesh, but also violence against women.

Comment: Dialogue with Bangladesh suppliers is shown to be on fire and building safety and all suppliers participated in FWF training on fire and building safety. A training on violence against women prevention was suggested to the supplier but not yet conducted.

All suppliers in Bangladesh are either member of the Accord or Alliance. Reports have been collected and improvements needed implemented.

2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Advanced Capacity	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	3	3	0
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Comment: Jack Wolfskin followed FWF's Myanmar policy and referred to it in its annual social report. Freedom of Association is an issue where Jack Wolfskin together with another FWF affiliates puts high focus on to ensure realization of real and reliable cooperation with unions.

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
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Comment: Jack Wolfskin has shared own audit reports, and has participated in shared FWF audits with other customers. It could show communication on coordinated follow-up of corrective actions at shared suppliers.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	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.	2	2	0
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Comment: Jack Wolfskin has below 1% production in low risk countries, mainly Italy. Jack Wolfskin has ensured with an audit that the code is posted (as Chinese migrant workers are employed at the supplier, the CoLP was also posted in Chinese).

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.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 35

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	4	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	1	

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
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.	2	2	0

Recommendation: It is suggested to ask suppliers to submit a photo of the posted CoLP with the annual questionnaire and include this in the supplier overview. Jack Wolfskin should monitor if its staff (including technicians) visiting a supplier checked if the documents are still posted as indicated on the obtained photo (in the right area, freely accessible to workers) and as checked during Sumations audits.

Comment: Jack Wolfskin has set up a systematic process to provide documents to manufacturers. Sumations checks during annual monitoring visits whether the CoLP has been posted.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	44%	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
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Recommendation: As part of the routine to ensure the worker information sheet is posted, Jack Wolfskin could request suppliers to send pictures of the posted document. In case of a supplier visit, the company representative can check whether is the document is posted.

Comment: During the last evaluation period, FWF conducted five audits at different production sites. At all production sites, FWF audit teams found that workers are not aware of the Code of Labour Practice. At three production sites it was the management not informing the workers. Four production sites participated in the Workplace Education Programme, hence at least half of workers at these production sites are aware of the FWF worker helpline.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes + Preventive steps taken	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	6	-2
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Comment: Remediation of complaints is in process or completed. Jack Wolfskin immediately reacts upon complaints involving other customers of the production site as well as stakeholders if feasible. To prevent complaints from happening again, the complaint case is integrated into the companies internal country study which is used as a base for upcoming audits and travels.

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 in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	-2
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Comment: In case of complaints at shared factories Jack Wolfskin actively cooperates with other brands in addressing worker complaints.

COMPLAINTS HANDLING

Possible Points: 15

Earned Points: 13

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: Everybody with supplier contact is informed in detail during the supplier evaluation at least twice a year.

Jack Wolfskin has so called Brand Coaches. They travel from store to store to train all store staff twice a year.

This intensive four day training includes two hours information on FWF.

All staff is informed yearly with the social report and in case of bigger complaint cases which need sharing with everybody.

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
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Comment: All staff working directly on the product and with production sites receive a training on social and environmental standards regularly. Details about FWF's work are explained such as the Code of Labour Practice and how to read an audit report.

Traveling technicians and traveling staff are explicitly trained on the OHS guide and on how to use the FWF OHS checklists. This enables them to perform checks on obvious issues during their visits at the production site. After their return, technicians report back to CSR staff about their findings. In addition, traveling technicians are included in supplier evaluation and rating meetings. They also have to participate once in an audit to know how FWF membership works in detail at the production site.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support 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.	2	2	-2
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Comment: Jack Wolfskin works with a limited number of agents for footwear and t-shirt production. The agents are trained, asked to join audits and to follow-up corrective actions with the factory. In addition they partly participate in FWF training provided to factories.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	26%	Lack of knowledge and skills 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.	4	6	0
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Recommendation: Jack Wolfskin should motivate its main supplier(s) to join the Workplace Education Programme trainings. These are designed to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace. In Bangladesh Jack Wolfskin should motivate its suppliers to join the Violence Against Women (VAW) training and set-up VAW committees at factory level.

Comment: 26 percent of Jack Wolfskin's suppliers (by production volume) have received a Workplace Education Programme training in the past three years. Several production sites joined the training in the past financial year. In general, WEPs are well received by the suppliers especially when the training includes participants from different production sites at the same time. High worker turnover at some of the production sites make it challenging to ensure staff keeps being aware of the labour standards.

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
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Recommendation: All factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace FWF recommends Member companies to ensure suppliers participate in trainings. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participation should be balanced and representative.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 9

Additional comments on Training and Capacity Building:

The CSR responsible joins FWF meetings such as the Annual FWF Conference regularly.

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	Any improvements to supply chains require affiliates to first know all of their 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: Jack Wolfskin has a supplier information system which includes all suppliers and their subcontractors. A supplier list is publicly available on Jack Wolfskin's website.

Jack Wolfskin allows its suppliers to use subcontractors but only after the supplier has the company's permission. This rule is shared with the supplier from the beginning of business relationship. Subcontractors are visited by traveling staff from Jack Wolfskin and it is policy that subcontractors are audited.

One of FWF's audits in this evaluation period has shown unauthorized subcontracting. Jack Wolfskin has stopped working with this supplier.

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
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Comment: Different departments have access to suppliers information.

INFORMATION MANAGEMENT

Possible Points: 7

Earned 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: Information on FWF membership is placed on the website in correct wording. The use of on product communication is according to FWF's communication policy.

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
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Comment: Jack Wolfskin published the last brand performance check on its website, and published its direct supplier list online: <https://www.jack-wolfskin.at/supply-chain.html>

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 affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	2	2	-2
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TRANSPARENCY

Possible Points: 4

Earned 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
7.2 Changes from previous Brand Performance Check implemented by affiliate	43%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: Last year's Brand Performance Check included 13 recommendations and one requirement. Seven recommendations have been integrated into Jack Wolfskin's work satisfactory. Some remain open but Jack Wolfskin has started to work on them. Most important is that Jack Wolfskin takes further steps to move towards living wages as estimated by local stakeholders which was last years requirement.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

1. Jack Wolfskin considers updated FWF's Code of Labour Practice document insufficient to inform workers.
2. Due to technical issues, Jack Wolfskin does not receive FWF newsletters which the company wants to receive.
3. Jack Wolfskin finds the process for approval of factory training inefficient and time consuming and recommends FWF to work on an easier system.
4. Jack Wolfskin likes to see FWF more engaged in German initiatives such as the German Textile Partnership. The multi-stakeholder initiative, comprising textile and clothing industry, retailers, trade unions and civil society, wants to pool the strength and expertise of its members in order to bring about social, ecological and economic improvements all along the textile supply chain.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	34	40
Monitoring and Remediation	35	35
Complaints Handling	13	15
Training and Capacity Building	9	15
Information Management	7	7
Transparency	4	4
Evaluation	4	6
Totals:	106	122

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

87

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

11-04-2016

Conducted by:

Ruth Vermeulen, Lisa Suess, Stefanie Karl

Interviews with:

Imen Wong (Vice President Product Development)

Melanie Kuntzawitz (Head of Vendor Control)

Nicole Sieverding (Manager Purchasing)

Andrea Demant (Finance)

Franz-Peter Kaiser (Director Purchase)

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.