



BRAND PERFORMANCE CHECK

GREIFF Mode GmbH & Co.KG

PUBLICATION DATE: DECEMBER 2016

this report covers the evaluation period 01-05-2015 to 30-04-2016

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

GREIFF Mode GmbH & Co.KG

Evaluation Period: 01-05-2015 to 30-04-2016

AFFILIATE INFORMATION	
Headquarters:	Bamberg, Germany
Member since:	15-03-2015
Product types:	Workwear, Corporate wear
Production in countries where FWF is active:	Macedonia, Republic of, Romania, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Germany, Morocco, Netherlands, Pakistan, Ukraine
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	41%
Benchmarking score	53
Category	Good

Summary:

Greiff is in the process of implementing FWFs management system requirements. It has monitored 41% of its supplier base, which meets the required threshold for the first year of membership.

Greiff has a stable supplier base, with suppliers in Eastern European countries, Morocco, Pakistan and Vietnam. With most of these suppliers, it has been cooperating for a long time. In its first year, Greiff focused on implementing FWF requirements, auditing suppliers and following up on Corrective Action Plans. It also has a large amount of External Producers. It has put a lot of effort in learning more about production countries of these producers.

Greiff has set the first steps of following up on issues found at suppliers. Suppliers responded positively to the discussions with Greiff and started to implement changes. Discussions concerning the CAPs mostly evolved around health and safety issues. With its Moroccan supplier, Greiff also discussed breast-feeding time and the registration of working hours. FWF recommends Greiff to also discuss more complex issues like wages and overtime.

Although Greiff is aware of most of its production locations, it is also learning about products which are being sent to subcontractors. Greiff should continue working on ensuring that it knows all of its production locations. Greiff should also ensure that it is aware of high-risks in specific production areas, like gender specific issues, legal minimum wage and the position of trade unions.

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	98%	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.	4	4	0

Comment: At almost all of its suppliers, Greiff has a considerable leverage giving them the opportunity to influence working conditions.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	93%	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.	4	4	0
--	-----	--	---	---	---	---

Comment: Greiff has a stable supplier base. Its strategy is to have long-term suppliers with whom it works on price, quality and labour standards.

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
--	-----	---	---------------------------	---	---	---

Recommendation: FWF recommends Greiff to continue collecting questionnaires from all its suppliers, including all subcontractors.

Comment: Greiff only selects a new supplier when there is a lack of production capacity. It had one new supplier which signed and returned the questionnaire.

Since it was the first year of membership, Greiff has asked all of its known suppliers to sign the questionnaire. It is in the process of identifying all production locations, including subcontractors. Greiff is working towards collecting questionnaires from all its suppliers. It has integrated the questionnaire in its selection process and it ensures that the questionnaire will be signed before first orders are placed.

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
---	-----	---	---	---	---	---

Recommendation: A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems. FWF recommends Greiff to assess the risks associated with operating in specific production areas before selecting a new supplier. FWF advises to use information from FWF country studies and wage ladders. Greiff could cooperate with local stakeholders to further investigate the situation in a specific country. FWF can offer information on local stakeholders.

Comment: When selecting a new supplier, Greiff visits the supplier and discusses labour standards. After having done a sample order, Greiff uses the FWF Health and Safety Check list. Greiff also asks the supplier about the wage levels in the factory, so it knows whether the legal minimum wage is paid. Greiff is in a process of re-designing its selection process and further integrating labour standards in the process.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	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.	1	2	0
--	-----	--	---	---	---	---

Recommendation: FWF encourages Greiff to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Furthermore, FWF recommends Greiff to include technical staff, especially those that are present daily at suppliers in the monitoring process of suppliers.

Comment: In its first year of membership, Greiff started to integrate supplier compliance in a systematic manner. It has done several FWF audits and it is collecting existing audit reports. Greiff has regular discussions with suppliers on CAP follow up. Furthermore, it keeps track of all the improvements. At the time of the Brand Performance Check, Greiff was setting up a supplier management system that should evaluate its suppliers on five topics: order processing, customer service, quality, general conditions and corporate responsibility.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
---	---------------------------	---	---	---	---	---

Recommendation: A production planning system can have a significant impact on the levels of (excessive) overtime at factories. Therefore, FWF recommends Greiff to relate its knowledge on the standard minutes per style and the size of the order to the total production capacity of the factory to know better what the impact of its orders are on the working hours of workers.

Comment: Greiff has two types of products, namely Never Out of Stock-items (NOS) and specific products that are being ordered by customers (20%). The catalog of the NOS- items has a validity of two years. Therefore, it does not have a high or low season. For the NOS-products, Greiff can give its suppliers a 12-months estimate of its production planning. The actual order placement can differ about 10 per cent. Last minute changes are rare.

The lead time for suppliers from Europe and Morocco is 10 weeks while for Pakistan and Vietnam it is approximately 16 to 26 weeks. For the first group of suppliers, Greiff buys the fabric and sends it to the factories. The second group supplies ready-made garments.

Greiff has a large stock and is capable of responding to clients' demands. Since most suppliers supply the stock, some degree of delay is accepted by Greiff and can be discussed. With the first group, delays of fabric are monitored and handled by Greiff and does not influence the lead time for these suppliers.

Greiff calculates the standard minutes per style, but has not yet related it to the production capacity of the factories.

When producing a specific demand of a customer, Greiff discusses production planning with the factories. It can shift production of NOS-items to a later stage. Because several factories produce the same items, Greiff also has the possibility to shift production between suppliers.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Intermediate 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.	3	6	0
--	----------------------	--	---	---	---	---

Recommendation: Greiff should further assess whether excessive overtime takes place at factories. In Morocco, FWF recommends Greiff to discuss with management and other buyers how to prevent overtime.

Comment: At its Moroccan supplier, the audit showed that working hours were not properly recorded by the factory management. Greiff has discussed overtime with its supplier and learnt that much of the overtime is made due to rush orders of another client.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-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.	2	4	0
--	----------------------	--	--	---	---	---

Recommendation: At a minimum, affiliates are recommended to investigate wages levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages. FWF recommends Greiff to investigate what the labour costs per minute are at its suppliers.

Comment: Due to the validity of two years of its catalog, Greiff discusses prices with suppliers over a two-year period. Greiff bases its own prices on the prices given by German Fashion Modeverband, an organisation that represents German fashion brands. Discussions with the supplier about the price is mostly focused on the working minutes per style. Greiff has asked all of its suppliers to let them know the wage level (lowest, medium, highest) in the factory.

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
---	-----------------------------------	--	---	---	---	----

Comment: No minimum wage problems were reported in the audit reports of its Pakistani and Moroccan supplier.

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
---	----	--	--	---	---	----

Comment: FWF audits did not show any proof of late payment by Greiff.

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.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0
---	----------------	---	--	---	---	---

Recommendation: FWF encourages Greiff to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models. FWF recommends Greiff to assess the cost of labour minutes at its suppliers.

Comment: In its first year of membership, Greiff has started to collect information on wage levels through audit reports and by asking suppliers to inform them about the wage levels.

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
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

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 26

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	36%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	5%	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	41%	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: Greiff has a CSR-officer designated to follow up on problems identified by the 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
---	--------------	---	---	---	---	----

Recommendation: FWF recommends Greiff to continue working on monitoring all of their suppliers, setting up CAPs and actively following them up. FWF encourages Greiff to also discuss more complex issues, like wages and overtime.

Comment: Greiff has started to follow up on the CAP at its suppliers.

Immediately after the audit results, Greiff took appropriate action by visiting its Moroccan supplier and discussing the results. The discussions evolved around improving health and safety, working hours, documentation and to ensure that women can use their legal right of one hour of breast-feeding time during work hours for a year after their pregnancy leave.

At its Pakistani supplier, Greiff has a SA8000 report, stating that few issues remain. It has cooperated with another FWF member to improve the situation in the factory, mainly on health and safety.

The Romanian supplier ceased activities due to the age of the factory owner (80 years). Together with Greiff, they ensured that workers found employment at a nearby factory. Greiff is now sourcing from that factory.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	90%	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
---	-----	---	---	---	---	---

Recommendation: Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries). Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: Greiff visits most of its suppliers annually and discusses labour standards. It was not able to also visit all of its smaller suppliers and subcontractors.

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 reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

Comment: In its first year, Greiff has collected a SA8000-audit report of its Pakistani supplier. It has used the FWF Audit Quality Assessment Tool. Greiff is in the process of collecting existing audit reports from all its suppliers.

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
--	-----	---	--	---	---	----

Comment: Greiff sends the audit report and CAP to the factory and discusses follow up with them. It prioritizes improvements and sets up a timeline.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Insufficient 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.	0	6	0
--	-----------------------	---	--	---	---	---

Requirement: Greiffs' monitoring system should identify and address high risk issues that are specific to the affiliates' sourcing practices. FWF provides policies and country-specific requirements to affiliates. Priorities in remediation efforts are guided by these policies.

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Greiff should provide additional measures for support and integrate that in the monitoring system. For example, it should think of the position of trade unions in its production countries, gender (in Pakistan and Morocco) and wages.

Comment: Greiff relies on (FWF-)audits to learn about high risk issues at its suppliers. It is aware of the risk of non-payment of legal minimum wage at suppliers and therefore takes additional steps to mitigate these risks. It also has taken steps to prevent (excessive) overtime.

Greiff is not yet very aware of high risks related to specific production areas and risks specific for its supply chain.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	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.	N/A	3	0
2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	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.	N/A	3	0

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

Comment: Greiff is actively sharing information with other FWF members about its suppliers and follow up of CAPs. It has started cooperation with one other brand to follow up the CAP at its Pakistani supplier.

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
--	-----	---	---	---	---	---

Comment: Greiff has six suppliers from low-risk countries. It has sent the questionnaire to all of these suppliers and also checked whether the CoLP was posted. It regularly visits its suppliers. Despite various efforts, one German supplier did not return the questionnaire, while one Dutch supplier returned the questionnaire but somewhat incomplete. Since Greiff spends less than 1% of their FOB at both suppliers and various efforts were made to have the questionnaires returned, full points will be awarded.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	43%	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.	1	3	0
--	-----	--	-----------------------------	---	---	---

Comment: In its factory outlet store in Bamberg, Greiff sells items from over more than 100 external producers. The size of the orders at a large portion of these external producers is usually very small. Greiff has send the questionnaire to all of its external producers. In total, 32 external producers had returned the questionnaire, amounting to 43% of the total external sales volume.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	4%	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.	0	3	0
---	----	---	---	---	---	---

Comment: One external producer is a FLA member, while another is a FWF member. Greiff is looking for ways to source more products from FWF/FLA members.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 18

3. COMPLAINTS HANDLING

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

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 the CSR-officer and the CEO are responsible for handling complaints.

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
---	-----	---	--	---	---	---

Comment: Greiff has set up a system to check whether the Worker Information Sheet is posted. During factory visits, it checks whether the sheet is posted. It also asks suppliers to send pictures of the Code of Labour Practices.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	0%	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
--	----	--	--	----	---	----

Recommendation: Greiff can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition to sending the worker information sheet, affiliates can use the worker information cards available for download on FWF's website.

Comment: Two FWF-audits were done showing that workers were not yet aware of their labour rights. With one other FWF-member, Greiff is looking for ways to provide training to its Moroccan supplier.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	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.	N/A	6	-2
--	------------------------	---	---	-----	---	----

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	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.	N/A	2	-2
--	--	--	--	-----	---	----

COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 1

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

Recommendation: FWF advises Greiff to develop a standard procedure for all new employees to get familiar with FWF membership. FWF has material available that can be used to inform (sales) staff. More specifically, FWF encourages Greiff to ensure that all staff that is involved in preventing, addressing and the remediation of human rights risks is aware of FWF requirements.

Comment: Greiff has informed its staff through the intranet, emails and notices and it has designed a CSR-Brochure for both staff and customers.

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
--	-----	--	---	---	---	---

Recommendation: A training session on labour standards can be held for purchasing staff. FWF can support or facilitate in providing trainings. In addition, it is recommended to actively take part in training opportunities FWF offers such as: FWF seminars, the FWF annual conference and webinars.

FWF encourages purchasing staff or agents to observe factory audits by FWF audit teams to learn about the audit process and to be able to better follow up on Corrective Action Plans.

Comment: Staff of Greiff participated in the seminar, webinars and the annual conference. It has not yet provided training to staff related to the promotion of labour standards.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	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.	1	2	-2
--	-----	---	---	---	---	----

Recommendation: FWF recommends Greiff to discuss with its agents how to further include them in monitoring and following up on human rights issues at its suppliers, especially since Greiff itself is not in touch with these suppliers. Greiff could get in touch with its suppliers and discuss labour standards in cooperation with the agent.

Comment: Greiff uses 4 intermediaries. They were all informed of FWF membership, but are not yet involved in monitoring and following up on labour standards.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	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.	0	6	0
---	----	--	--	---	---	---

Recommendation: In order 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, FWF developed the Workplace Education Programme. Greiff should motivate its main supplier(s) to join WEP trainings.

Comment: No WEP-trainings were conducted at the suppliers of Greiff.

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: Whenever the FWF affiliate contacts a new supplier, this new supplier must be informed on the implications of FWF membership. 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 affiliates 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 participations should be balanced and representative.

Comment: No other trainings were conducted.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 4

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	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.	3	6	-2

Requirement: After the end of each financial year, affiliates must confirm their list of suppliers and provide relevant financial data. Greiff needs to ensure that it knows all of its production locations as soon as possible and start monitoring them.

Recommendation: Affiliates are advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints;
- 2) Business relationships with agents include transparency of production locations;
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

The supplier register of the previous financial year has to be complete and accurate; production locations of all suppliers must be listed, including subcontractors. Correct FOB percentages should be given per supplier to show the relevance of each supplier in relation to the affiliate's total purchasing volume. These can be calculated on the basis of payments made during the previous financial year. Greiff is asked to notify FWF as soon as possible in case unknown subcontractors are discovered.

Comment: In its first year of membership, Greiff is learning more about its suppliers and subcontractors. Through the questionnaire and audit reports, it has already learnt that some of its suppliers outsource its products. At other suppliers where Greiff is not yet aware of subcontracting, there is also a risk of subcontracting. Greiff is making good progress in identifying all of its production locations.

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
--	-----	--	---	---	---	----

Recommendation: It is advised to make relevant staff aware of the available tools FWF offers, such as monitoring CAP documents, reports on living wage and access to FWF's online information system. Purchasing and technical staff is recommended to share reports from factory visits that include a status update of implementing the CoLP.

Comment: Important events and information are exchanged among the head of departments in a weekly meeting; the CSR department receives the notes. Regular meetings between management, CSR, disposition, Head of Purchasing and the Technical manager are held to update them on the working conditions at suppliers.

All staff can access the material on working conditions, including the CAPs of factories.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

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

Recommendation: FWF recommends Greiff to regularly check whether all of its communication is in line with the FWF communication policy. FWF staff can assist by advising on Greiff's communication.

Comment: Greiff communicates about FWF on its website, in tenders and to its customers. Communication adheres to the FWF communications policy. FWF only suggested to make some minor changes to its communication on the website.

6.2 Affiliate engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	1	0
--	----	---	---	---	---	---

Recommendation: FWF recommends Greiff to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of Greiff and FWF's work.

Comment: Greiff does not yet engage in advanced reporting activities.

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
---	----------------------------------	---	---	---	---	----

Comment: Greiff has sent its social report to FWF and posted it on its website.

TRANSPARENCY

Possible Points: 4

Earned Points: 3

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: Due to its first year of membership, Greiff has not yet had an annual evaluation. Top management and the CSR officer did evaluate progress on improving working conditions throughout the year.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	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.	N/A	4	-2
--	---	---	--	-----	---	----

Comment: This is the first Brand Performance Check report for Greiff.

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

No recommendations were given.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	26	40
Monitoring and Remediation	18	35
Complaints Handling	1	7
Training and Capacity Building	4	15
Information Management	4	7
Transparency	3	4
Evaluation	2	2
Totals:	58	110

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

53

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

08-11-2016

Conducted by:

Wilco van Bokhorst

Interviews with:

Hans-Peter Beck - CEO

Nicole Wagner - CSR Manager

Jürgen Lützelberger - Head of Purchasing, Product Management and Marketing

Robert Pröll - Technical manager

Sabine Sahliger, Chief Financial Officer

Michael Schlaug - Sales manager

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.