



## BRAND PERFORMANCE CHECK

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van Laack GmbH

this report covers the evaluation period 01-05-2018 to 30-04-2019

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company 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 product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location 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 product location 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 member company 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# BRAND PERFORMANCE CHECK OVERVIEW

van Laack GmbH

Evaluation Period: 01-05-2018 to 30-04-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Monchengladbach, Germany
Member since:	01-03-2017
Product types:	Fashion
Production in countries where FWF is active:	Tunisia, Turkey, Viet Nam
Production in other countries:	Germany, Italy, Slovenia
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
SCORING OVERVIEW	
% of own production under monitoring	90%
Benchmarking score	56
Category	Good

## Summary:

van Laack GmbH has met most of Fair Wear's performance requirements. The brand monitored 90% of its total purchasing volume, which is well above the 60% required by members after two years of membership. The benchmarking score of 56 places van Laack GmbH in the 'Good' category.

In the past financial year, van Laack GmbH has made some good progress on brand performance indicators. van Laack GmbH owns two factories located in Tunisia and Vietnam, works closely with them in planning the production and has insight into total factory production capacity in minutes. Since its first performance check, the company's due diligence and monitoring processes on implementing the Code of Labour Practices have improved, mainly by assigning designated staff.

Fair Wear recommends that van Laack GmbH expand its knowledge of cost break downs learned from owned factories to all its production locations. The next step would be to analyse in-depth the link between the buying prices and the exact cost of labour through open costing. Together with its suppliers, van Laack GmbH should define a target wage and start implementing measures to close this gap.

Besides monitoring its efforts on the payment of a living wage, Fair Wear requires van Laack GmbH to work on a systematic approach that will integrate social compliance into normal business processes and support good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

## PERFORMANCE CATEGORY OVERVIEW

**Leader:** This category is for member companies 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 member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—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 member companies will receive a 'Good' rating.

**Needs Improvement:** Member companies 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. Member companies 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:** Member companies 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. Member companies 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
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	92%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: In total, 92% of the production volume came from locations where the company buys at least 10% of the production capacity. This is an improvement by 6% in comparison to the previous performance check.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	6%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: Almost 6% of the production volume came from locations where the company buys less than 2% of its total FOB. This is an increase of 3% in comparison to the previous financial year mostly caused by the production of ties and garments made of silk.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	100%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: van Laack GmbH values long-term relationships, especially with its own main suppliers (van Laack Tunisie and van Laack Asia) with which it has been working for decades. The percentage of production volume where a business relation longer than five years exists is 100%, which is a small increase in comparison to the previous financial year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	2nd years + member and no new production locations selected	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	N/A	2	0

Comment: van Laack GmbH did not onboard a new production location in this financial year, therefore this indicator is marked as N/A. For its existing suppliers, a random check was done and the brand was able to show the signed questionnaires. The questionnaire is part of the 'new factory onboarding process' and therefore the requirement from the previous brand performance check has been fulfilled.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

**Comment:** The business strategy of the brand is customisation, which is translated into high-end and long-lasting products made at the factories with high craftsmanship skills. The brand has a due diligence process to identify general country risks by checking published studies, common websites and working with communities in specific countries. The due diligence at the supplier level is done by visits (reports and pictures are made) and by collecting and checking existing audit reports. In Slovenia and Turkey, the brand's technician(s) are monitoring the factories not only on the quality issues but also on the CoLP. Also, the CEO visits the suppliers and does checks on workers' turnover rate and workers' absence. For the owned factories, those checks would indicate if the factory is in line with a 'Feel-good management' strategy, which should ensure a safe and healthy environment for all workers.

**Recommendation:** The member has shown taking due diligence steps for their current suppliers. A due diligence process needs still to be formalized and included in a sourcing strategy to ensure consistency. FWF advises to use information from FWF country studies and wage ladders and use the FWF Health and Safety guidelines. The member can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potential new) sourcing countries.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	No	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.	0	2	0



**Comment:** In its own factories in Tunisia and Vietnam, van Laack GmbH is running special programs and had both factories audited by FW audits. Both factories have their independent factory management, which is responsible for compliance with the Code of Labour Practices and the company's own Code of Conduct. Therefore, the rewarding by HQ is done with different mechanisms such as long term commitments, providing skill training, healthy eating training, free service by a lawyer if needed and some sports activities. Factory Social reports describe and provide more in-depth information on all abovementioned activities. Part of the evaluation is reviewing remediations status of the findings listed in the CAP's for both factories. As 90% of the FOB production volume comes from the brand's own factories, there is a little room for making decisions based on supplier evaluation and awarding the suppliers by placing higher orders. For other suppliers evaluation (not owned 10%), van Laack GmbH does a supplier production evaluation once per season before new orders are placed.

**Requirement:** A systematic approach is required to integrate social compliance into normal business processes and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** Although van Laack GmbH does not work with a classic production planning system based on historical sale and forecasts, the brand has a strong integrated system in planning the production. This planning process has been developed through the years and the internal system has been tested and adjusted to the company's needs. The planning process is in collaboration with several departments. The purchasing department has data available on factory capacity per week, the lead time needed to prepare and labour minutes needed per style. Orders are compiled and placed to make sure volumes are high. To support the preparation, trims are classified based on lead times into categories: A, B, C. The production is divided into continuous production with longer lead times for regular collections (2 collections a year) and flash fashion collections (3-4 collections a year) with short lead times. The production planning is done on a daily and weekly bases to assure the actual factory capacity is available and no overtime is created. The production is planned to keep the balance and respect the factory available capacity in minutes when the flash collection production is involved. The company is able to adjust the shipment by air in case of production delay. This production planning process has been developed not only with the aim to satisfy the customers but the biggest advantage here is no waste creation.

With other (not owned) CMT suppliers located in Turkey and Slovenia, the company has a direct relationship and production capacity is booked in advanced. Fabrics and trims are sourced by van Laack GmbH from Europe and delivered to their CMT production locations.

van Laack GmbH does a supplier production evaluation once per season before new orders are placed

**Recommendation:** FWF recommends van Laack GmbH to learn more about the standard minute per style and how the production of its products impacts the total production capacity of its other (not owned suppliers) suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	N/A	6	0

Comment: No audit findings on excessive overtime.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

**Comment:** At its own factories, which produced 90% of the total FOB in this financial year, van Laack GmbH has good insights into total factory capacity in minutes and product prices, including prices of fabrics and trims. Furthermore, van Laack GmbH is aware of the labour minutes per style and makes the link with sourcing prices through negotiating and setting up the 'price of factory minute.' The company headquarter is analysing increases in paid wages at both factories (Vietnam, Tunisia) each year to gain a better picture of the factory business performance. However, further analysis of this linkage should be made through open costing in order to assess awareness and impact on workers' wages.

For its CMT production locations with a direct business relationship (not owned), van Laack GmbH negotiates the sourcing prices and does not know the built-up of the price per piece related to wages paid to the workers. However, the company ensures its pricing allows at least the payment of the legal minimum wage and started working this year on a product price strategy policy. Furthermore, van Laack GmbH collected all existing audit reports as part of due diligence and it checks if a minimum wage is paid during its product price negotiations.

**Recommendation:** FWF recommends van Laack GmbH to expand their knowledge of cost break downs learned from owned factories to all its production locations. A next step would be to analyze in-depth the link between the buying prices and the exact cost of labour in production locations.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

**Comment:** The initial audit at van Laack Asia showed that although the factory pays the legal minimum wage, some workers were not paid an additional 5% for hazardous work, as per local legislation. The company analyzed this audit finding and found the root cause was that most of the workers were shifting jobs too often during a training period of 3 months. A proposal was made by the factory management to identify and clarify the hazardous jobs and not to move workers too often.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations 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 production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** The initial FW audit at van Laack factory in Tunisia shows that the living wage is paid to the first-line supervisors only. For the wages paid to the workers, the factory mostly pays them according to Trade union demand.

The FW follow up audit in 2019 in the factory in Vietnam shows that almost 54% of sewing workers receives the wage above the benchmark of Global Living Wage Coalition (LWC).

Nevertheless, the root cause analysis of wages that are lower than the living wage were not identified yet by the company.

**Requirement:** In case van Laack GmbH buys exclusively at a supplier or owns a supplier, the member is held more accountable for implementing adequate steps. The member is expected to take an active role in discussing living wages with its suppliers and should take steps to work towards living wages.

**Recommendation:** FWF encourages van Laack GmbH to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages.

We advise companies to avoid the concept of a one-time charitable contribution. We strongly recommend members to integrate the financing of wage increases in its own systems, herewith committing to a long term process that leads to sustainable implementation of living wages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	90%	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 member company's score.	Supplier information provided by member company.	2	2	0

**Comment:** van Laack GmbH owns two production facilities: van Laack Tunisie and van Laack Asia accountable for 90% of its total production volume.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	4	0

**Comment:** van Laack headquarter (HQ) has insight into total production minutes per factory and negotiates a price per minute with own factories once per year. Part of this negotiation is also an agreement on extra payment for smaller orders. The factory manager is responsible for negotiating the price list once per year through a contract. The advantage of this process is that the factory manager can negotiate with the HQ in order to comply with local laws in the country but also take full responsibility for the factory workforce. Both factories are evaluated by HQ once per year and the analysis is done to see the financial factory performance including workers salary. According to the overall analysis conducted by HQ, the increase in workers' wages is taken from the company's margin. To determine the exact impact on worker's wages, further in-depth analysis should be made.

For other (not owned supplier), the company is negotiating the price per product per season separately.

**Requirement:** In case the member buys exclusively at a production location or owns a production location, the member company has full influence over the wages and should be able to cost for a living wage.

**Recommendation:** It is advised that the strategy for how to finance wage increases is agreed upon by top management.

In determining what is needed and how wages should be increased, it is recommended to involve worker representation

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	34%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	2	3	0

**Comment:** Although no target wage has been set up yet, the FWF follow-up audit at van Laack Asia in Vietnam in 2019 shows payment of a living wage for a larger part of the workers.

Requirement: van Laack GmbH is expected to begin setting a target wage for its production locations.

Recommendation: FWF encourages the member to show that discussions and plans for wage increases have resulted in the payment of a target wage.

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## PURCHASING PRACTICES

Possible Points: 41

Earned Points: 27

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	90%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	6%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	N/A	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check		
Total of own production under monitoring	90%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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: The Sr. Quality Manager and Supply Chain Manager have been appointed to follow up on the problems identified by the monitoring system.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. 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:** The audit reports and CAP's are shared in time and discussed with the production locations, timelines for CAP follow up are set. van Laack GmbH sends reminders and in case of a late response, company management is looped in the email conversation about CAP follow up.

**Recommendation:** Before an audit takes place, van Laack GmbH is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting.

Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

**Comment:** van Laack GmbH uses the CAPs to communicate and keep track of remediations. Open issues are marked red, partly resolved issues yellow, and resolved issues green. Resolved issues are supported by evidence (documents, photos), which are stored in the company folder. If the update by the factory is taking too long, a reminder email is sent by van Laack GmbH.

van Laack GmbH has two CAP's active, both from its own factory audits and has made improvements on CoLP by implementing CAP's remediations.

A progress on CAP remediations for the factory in Vietnam has been made, most of the findings were resolved or are in progress: on living wage (the factory has stopped the practice to retain workers' wage during their training period, severance allowance has been paid on time to the workers, workers' bonus is paid without delay); on working hours (workers are no longer working 7 consecutive days without one day rest); on health & safety (workers have been trained in first aid, factory has employed one medical staff and the fire alarm has been installed). However, there are still significant findings open in employment (workers are forced to give a termination notice 90 days in advance instead of 45 days as stipulated by local law); on living wage (resigned workers are not paid within 7 days after their resignation).

The initial FWF audit at van Laack in Tunisia in 2018 indicated some but not excessive overtime by the apprentices and this finding was remediated by assigning an adequate policy. Most of the findings on health & safety are remediated.

For other (not owned) suppliers, van Laack GmbH is collecting and evaluating the BSCI audit reports in addition to the factory visits. In Slovenia and Turkey, the brand's technician(s) are monitoring the factories not only on the quality issues but also on the CoLP.

**Recommendation:** It is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	96%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: 96% of the production locations have been visited by staff of van Laack GmbH, which is an increase of 54% in comparison to the previous financial year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

Comment: Existing audit reports are collected, however, there was no proof of the systematic use of the FWF Audit Quality Assessment Tool and CAP follow up.

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.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	1	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Intermediate			3	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Abrasive blasting-

van Laack GmbH has checked with its denim supplier and found out that this supplier does not use abrasive blasting for its production. van Laack GmbH yet to share the FWF policy on abrasive blasting with its denim supplier (washing subcontractor) and to explain that their FW membership means that abrasive blasting cannot be used.

**Turkey-**

van Laack GmbH stopped sourcing through an agent in Turkey and it works with its only Turkish supplier directly. This supplier has confirmed that Syrian refugees are not employed. The FW policy on the Syrian refugees should be shared with this factory.

**Other risks-**

In Vietnam, the company is aware of endemic issues such as Freedom of Association and Excessive overtime. According to the audit at van Laack Asia, this factory had a union previously but it was dissolved in April 2018. Although the factory management is aware of the country legal law, FWF audit showed a violation that a dialogue meeting has not been organized every 3 months as required by laws. According to audit findings, no issue on excessive overtime was listed.

For Tunisia, the company is aware of endemic issues such as short term contracts. The initial audit at van Laack Tunisie did not show a violation on this issue.

For the suppliers in Italy, no risk assessment has been made to assess its suppliers on migrant workers and forced labour in the Lombardy and Tuscany regions.

**Requirement:** Turkey-

FWF members should ensure that all suppliers have a policy in place on the registering of Syrian refugee workers. FWF policies can be found on FWF member hub. Production locations who appear to be at particular risk of violation to Syrian refugees -or at risk of using unauthorized subcontractors- should be scheduled for an audit focused on these risks; As many Syrian refugee workers are working in subcontractor factories, FWF encourages members to ensure the subcontractors are included whenever main suppliers are audited. All standard FWF procedures (e.g. posting of Code of Labour Practices, option to participate in the Workplace Education Programme, Arabic and Turkish helpline etc.) also apply to subcontractors.

FWF members should schedule visits to Turkish suppliers and their known subcontractors at least annually.

**Recommendation:** FWF recommends van Laack GmbH to more systematically analyze human rights risks per country and integrate that into its organizational and decision-making processes. Per country, it could assess and mitigate risks, set priorities and develop possible solutions. FWF provides policies and country-specific requirements for Member companies. Priorities in remediation efforts are guided by these policies.

**Abrasive sandblasting-**

When alternative production methods are introduced, FWF members must perform a risk assessment of these methods and accept to fully disclose all information related to the health and safety of workers involved. In cooperation with the member, FWF will determine the approach for ensuring safe methods.

**Syrian refugees-**

van Laack GmbH could encourage its Turkish supplier that if a position opens up they can consider employing a Syrian refugee worker. They can discuss with their suppliers to cooperate with United Work, a NGO that collects the CVs of Syrian refugees in Turkey. van Laack could discuss what support they can offer support when Syrian workers are employed.

van Laack GmbH could schedule a WEP module on Syrian refugee workers at a Turkish supplier that employs Syrian refugee workers or that is located in an area where many Syrian refugee workers are working. WEP module on Syrian refugee workers is developed for management and for Turkish and Syrian workers.

FWF has established an Arabic-language version of its worker helpline and developed worker information sheets in Arabic, with contact information for the helpline. Member brand could distribute these cards to all suppliers and subcontractors during factory visits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

**Comment:** No shared production locations with other FWF member.

**Recommendation:** Cooperation among FWF members is required. In addition, it is advised to identify other clients and their commitment to improving working conditions. Involving more customers of the factory increases leverage, the chances of successful outcomes and long term improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	3	0

**Comment:** van Laack GmbH sources from other (not owned) suppliers located in Slovenia, Italy and Germany. Most of the questionnaires have been collected and production locations have been visited by the company's staff or local brand representatives. However, van Laack GmbH did not check for all locations whether the Worker Information Sheet was posted. Although there is a small improvement in comparison to the previous brand performance check, the company needs to make sure that all production locations in production countries Germany and Italy have a WIS posted.

**Requirement:** Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Ensure up to date information on the labour conditions in the location either by a regular visit and/or a report by a third party;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.



**Recommendation:** FW recommends to the member to have the FW Worker Information Sheet (WIS) posted in local languages in its all production locations.

FW members are advised to conduct a mapping of its supply chain in Italy that includes: an investigation of subcontractors, the ownership structure of production locations, the number of workers and the type of employment relationship (irregular and migrant employment) to identify and mitigate potential labour rights violations. Members are encouraged to visit their production locations in Italy to discuss the risks associated with irregular and migrant employment relationships. Please note we will publish an Italy risk analysis and guidance paper shortly.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	FWF encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	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	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

## MONITORING AND REMEDIATION

Possible Points: 28

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: The Head of Supply Chain Logistics is designated to address worker complaints. If not available, the Quality Manager is second. In addition, a specific CSR e-mail address has been created to receive the complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the FWF Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

Comment: van Laack GmbH has informed factory management and workers of its biggest suppliers about FWF CoLP and complaints hotline. Although some evidence (Slovenia) was provided, not all production locations have posted WIS. The evidence of posted WIS at Turkish, Italien and German production locations was not provided.

**Requirement:** The member must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers. Member company should check by means of a visit whether the Worker Information Sheet is posted in the factories.

**Recommendation:** It is suggested to ask production locations to submit a photo of the posted Worker Information Sheet and to ask staff visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	0%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

**Comment:** Two production locations were audited by FWF. Both audits reported that despite verifiable efforts of the employer, less than 50% of interviewed workers were aware of the FWF CoLP and complaints mechanism.

**Requirement:** FWF requires members to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline. The member should ensure good quality systematic training of workers and management on these topics. To this end, members can either use FWF's Workplace Education Programme (WEP) basic module or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF's guidance on training quality standards is available on the Member Hub.

**Recommendation:** FWF recommends members to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline among a larger portion of its suppliers. The member should ensure good quality systematic training of workers and management on these topics. To this end, members can either use FWF's Workplace Education Programme (WEP) basic module or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location 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. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company 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	0

## COMPLAINTS HANDLING

Possible Points: 9

Earned Points: -1

## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	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	0

**Comment:** The FWF membership is discussed with both factory managers (Vietnam, Tunisia) during the regular visits to the headquarter office in Germany. Internally, the company has three layers of meetings to inform all its staff about FWF requirements: top management meetings, management meetings and departments meetings.

Sourcing and purchasing staff possess the knowledge necessary to implement FWF requirements, however, the process is still to be implemented internally.

van Laack staff has gathered relevant knowledge by attending stakeholders meetings and seminars organized by FWF in Vietnam, Amsterdam, Germany and Tunisia.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	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	-1

**Comment:** The purchasing department is responsible for informing all its suppliers about FWF requirements.

**Recommendation:** FWF encourages purchasing staff or agent 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.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
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 member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	0

**Comment:** van Laack GmbH actively informs all its sourcing contractors about the FWF memberships and CoLP. Agents are only involved in fabric sourcing but not in the sourcing of CMT production.

**Recommendation:** FWF recommends the member to actively train their sourcing contractors/agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

Comment: All programmes mentioned in indicator 4.4 are continuous and managed by the factory management.

## TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 4

### Additional comments on Training and Capacity Building:

In its own factory in Tunisia, van Laack designed and implemented concept 'Feel good management'. It's horizontal management, by the smile, by transparency, by trust, by the force of the group, by equity and by the human potential. In the centre of the company's interest is a reevaluation of social justice, safety at work, health, training, sports and cultural activities. As most of those training and activities support the transformative process relate to human rights, points were awarded.



## 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 member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Laack GmbH confirmed their list of suppliers and provided relevant financial data to FWF at the end of the financial year.

van Laack GmbH knows where its production is located. This is also checked through its own local staff responsible for quality check. However, an audit report indicated a subcontractor which was not disclosed to FWF. The washing facility in Tunisia was used for the test order and salesman samples. Although the bulk production will start in the new financial year, this facility should be listed in the FWF database.

**Recommendation:** FWF recommends van Laack GmbH to periodically check with its agents and direct factories whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including subcontractors.

FWF recommends van Laack GmbH to ensure that the supplier platform cannot select and place production at new production locations before van Laack GmbH has completed the human rights due diligence process. FWF recommends to put this agreement with the intermediary platform in writing. Furthermore, FWF recommends the member to develop a responsible sourcing strategy towards the selection of new production locations. After the end of each financial year, members must confirm their list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production, including salesman sample.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	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: Monthly reports on CSR information are shared internally in addition to weekly and monthly meetings including several departments.

## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company 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.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	2	0

**Comment:** There is a link to FWF website on the van Laack's webpage but the company's social report and previous brand performance check report are not posted.

**Recommendation:** FWF recommends the member 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 the member and FWF's

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report submitted to FWF	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	1	2	-1

Comment: van Laack GmbH submitted its social report to FWF.

## TRANSPARENCY

Possible Points: 6

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: The FWF membership is evaluated by top management and by the owner. Audit results of the van Laack GmbH production locations and brand performance check reports are shared.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	60%	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.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

**Comment:** In the previous year Brand Performance Check, ten requirements were included:

- Indicator 1.3: new suppliers sign and return the questionnaire before first orders are placed - all questionnaires were collected - resolved.
  - Indicator 1.4: A formal process should exist to evaluate the risks of labour violations in the production areas - resolved but the company should include this process in the sourcing strategy.
  - Indicator 1.5: A systematic approach is required to integrate social compliance into normal business processes - to be resolved (in progress).
  - Indicator 1.8: To develop a pricing policy, which allows the payment of at least legal minimum wages for different workers in production countries - resolved.
  - Indicator 1.9: Payment of minimum wage - the issue has been analyzed, the proposal made to implement.- in progress.
  - Indicator 1.11: To take an active role in discussing living wages with its suppliers - no progress.
  - Indicator 2.1: Specific staff is designated to follow up on monitoring requirements - resolved.
  - Indicator 2.4: Degree of progress towards resolution of CAP's - A progress made on CAP's remediations and implementations - progress.
  - Indicator 2.7: To actively inform their Turkish supplier about risks related to employing Syrian refugees - no progress.
  - Indicator 2.9: Monitoring requirements need to be fulfilled for production in low-risk - to be resolved.
- For nine out of fourteen requirements, van Laack GmbH has made a progress or they are resolved.

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## EVALUATION

Possible Points: 6

**Earned Points: 6**

## RECOMMENDATIONS TO FWF

A proactive approach from brand liaison after receiving the audit report and CAP.

Better communication from FWF and preferably schedule three calls per year with the brand liaison.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	27	41
Monitoring and Remediation	18	28
Complaints Handling	-1	9
Training and Capacity Building	4	11
Information Management	4	7
Transparency	3	6
Evaluation	6	6
Totals:	61	108

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

56

PERFORMANCE BENCHMARKING CATEGORY

Good



## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

30-10-2019

Conducted by:

Terezia Haselhoff

Interviews with:

Mr. Christian von Daniels - CEO

Mr. Dr. Wendelin Sitter - CFO

Mr. Markus Becker - Supply Chain Manager

Mrs. Catharina von Spee - Senior Quality Manager

Mr. Julian Wossak - Head of Purchasing

Mr. Ralf Kittner - Head of Production Logistics and Planning