



## **Brand Performance Check**

**Jack Wolfskin**

**Publication date: August 2020**

This report covers the evaluation period 01-10-2018 to 30-09-2019

## About the Brand Performance Check

Fair Wear Foundation (Fair Wear) 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. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear'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 Fair Wear 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 Fair Wear 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 Fair Wear'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

## Jack Wolfskin

Evaluation Period: 01-10-2018 to 30-09-2019

Member company information	
Headquarters:	Idstein/Ts. , Germany
Member since:	2010-07-01
Product types:	Outdoor, sports & activewear, bags, accessories, footwear, luggage & travel accessories
Production in countries where Fair Wear is active:	Bangladesh, Cambodia, China, Indonesia, Myanmar, Turkey, Viet Nam
Production in other countries:	Germany, Italy, Portugal, Republic of Korea, Slovenia, Taiwan
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	99%
Benchmarking score	80
Category	Leader

## Summary:

Jack Wolfskin has shown advanced results on performance indicators and has made exceptional progress. Jack Wolfskin has monitored 99% of its total purchasing volume, which is well above the 80% required of brands in 3+ years of membership. Combined with a benchmarking score of 80, Jack Wolfskin maintains its 'Leader' status.

Its strong monitoring system - including frequent visits and close relationships with key suppliers - allows Jack Wolfskin to work effectively on improving working conditions. While excessive overtime was still documented within the supply chain, the brand's production planning system does facilitate reasonable working hours.

Jack Wolfskin has set target wages for its key markets (Vietnam and Bangladesh) and could demonstrate that the majority of workers at 24% of its production locations receive a living wage. Fair Wear recommends that Jack Wolfskin determines target wages that meet or exceed estimates recommended by Fair Wear in its Living Wage policy, and document the link between its buying prices and wages more clearly.

Fair Wear encourages Jack Wolfskin to involve worker representation in the process of setting a target wage as well as in the remediation of labour rights violations in general.

During its last financial year, the company also dealt with a high number of complex complaints and invested a significant amount of time in resolving them in accordance with Fair Wear's complaints procedure.

Jack Wolfskin follows an advanced approach to transparency. Production locations as well as aggregated audit results are published on its website. CSR staff actively contribute to discussions within the Fair Wear community and frequently collaborate with other members.

## 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 Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear 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.	68%	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.	3	4	0

**Comment:** Jack Wolfskin bought two thirds of its production volume from locations where it accounts for at least 10% of the factories' production capacity. At a number of locations Jack Wolfskin accounts for 20-50% of the factories' total production.

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.	35%	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.	0	4	0

**Comment:** While Jack Wolfskin works with a number of key suppliers, a considerable portion of their production volume (35%) is sourced from locations where the brand buys less than 2% of its total FOB. This is mainly due to a large production range that requires for example different machinery or specific expertise. Jack Wolfskin is aware of the risk associated with such a supply chain and has made efforts to consolidate. At the same time the brand feels that a stronger consolidation push could also increase the risk of unauthorized subcontracting.

**Recommendation:** Fair Wear recommends Jack Wolfskin to continue efforts to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Jack Wolfskin should continue to determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

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.	61%	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.	3	4	0

**Comment:** Jack Wolfskin aims to maintain a stable supply chain and long-term relationships with suppliers. During its last financial year the brand bought 61% of its production volume from production locations where a business relationship has existed for at least 5 years.

In some cases Jack Wolfskin might opt to integrate new suppliers if technical specifications of a product require it or place orders with new production locations operated by suppliers with an existing business relationship.

**Recommendation:** Fair Wear recommends Jack Wolfskin to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

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.	Yes	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.	2	2	0

**Comment:** Jack Wolfskin has established a formal system to ensure all new production locations are required to sign and return the questionnaire with the CoLP before first bulk orders are placed. Due to a sudden bankruptcy of a key footwear supplier, Jack Wolfskin had to on-board a number of new production locations on short notice. The brand was nevertheless able to collect the signed Fair Wear questionnaire before start of bulk production.

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.	Advanced	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.	4	4	0

**Comment:** Jack Wolfskin follows a thorough assessment process when selecting new production locations.

The sourcing team first evaluates the technical capacity of a supplier and often visits the site at an early stage. In this case staff also uses the Fair Wear health and safety checklist. The results are then presented to different departments including CSR, which conducts a basic check of the production location.

Before a trial order is placed, the production location is asked to return the signed questionnaire including the Fair Wear CoLP and a social audit is conducted. In addition Jack Wolfskin collects and evaluates existing audit reports.

This information is used for a supplier evaluation that includes topics like technical skills of a supplier, their communication, social compliance aspects, product development, purchasing etc. Representatives of different departments (including CSR) are part of the rating process, on which the decision to enter a business relationship is based.

When a key footwear supplier unexpectedly announced bankruptcy, Jack Wolfskin first tried to place scheduled orders with other suppliers in their supply chain and also postponed production. For the remaining production, several new production locations had to be on-boarded on short notice based on recommendation of Jack Wolfskin's network. While it was not possible to conduct full audits before start of production at those locations, Jack Wolfskin collected existing audits as much as possible to identify potential risks.

During its last financial year Jack Wolfskin did not start production in a new sourcing country. The company is aware that this requires thorough due diligence, which it has demonstrated in the past. Jack Wolfskin for example decided against sourcing from Ethiopia partly due to social compliance concerns.

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.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

**Comment:** Jack Wolfskin conducts a formal supplier evaluation for each season (twice a year) and includes the progress over various years.

Suppliers are rated based on a traffic light system in several categories including social compliance. Subcontractors receive a lighter assessment focusing only on social standards and technical capacity. This assessment is then integrated in the total rating of a supplier in direct contact with Jack Wolfskin.



The social standard rating is based mainly on performance in the latest social audit. At the same time Jack Wolfskin is conscious to promote FWF's approach of continuous improvement. This means that they highlight that intransparency as well as unwillingness to remediate can also lead to discontinuation of a relationship in severe cases.

CSR has a veto right in case social standards are not improving even if a supplier performs well in other categories.

Results are shared with suppliers. Suppliers who score low on the human rights due diligence standard of Jack Wolfskin are monitored more intensively and are supported to achieve progress.

The evaluation is used for future sourcing decisions. Whether it is possible to increase orders also depends on the necessary production capacity and the production capacity of the supplier.

With this system Jack Wolfskin aims to align business decisions and social performance as much as possible.

During its last financial year, Jack Wolfskin has started including material supplier in the evaluation. The sustainability assessment for these locations has been focused on chemical safety.

Next to this formal evaluation, CSR meets other departments every second week. During these meetings CSR informs colleagues about the general relationship with a supplier in regards to social standards and possible critical developments, so they can take this into account for their work. This may include updates about complaints and progress on remediation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** Jack Wolfskin has a robust and elaborate planning system in place to support reasonable working hours at the production locations they source from.

Suppliers receive first information about planned orders around 9 months in advance (range fixing). They are able to provide feedback on the proposed timeline. In many cases timelines have already been established in previous seasons and hence allow a level of predictability for the supplier. Suppliers are asked to plan production based on an 8 hour work day. Occasions such as Ramadan and Chinese New Year are also taken into account.

A first capacity forecast is shared in November for orders due between May and August (bulk production). At that time Jack Wolfskin also blocks capacity at material suppliers. Orders are then placed iteratively and forecasts are adjusted weekly. Fluctuations in order volumes compared to the initial planning might vary between -10% to +15%. For winter 2018 Jack Wolfskin could demonstrate that the difference between numbers communicated during range fixing and final orders placed were minimal.

Key process milestones from the brands side are adhered to. Order specifications are not changed.

In previous years Jack Wolfskin identified Special Make Up styles that are produced next to their regular range as a possible contributing factor to production pressure. As a reaction the brand has integrated these styles into their main production planning system.

Additionally Jack Wolfskin also places pre-orders for carry over styles to alleviate pressure during peak production times.

During its last financial year, Jack Wolfskin further increased local staff capacity in China and Vietnam for quality control and product development to improve production flows.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	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.	3	6	0

**Comment:** Jack Wolfskin is continuously building on the relationships with their suppliers to make sure that they report issues on time and overtime hours can be prevented. Preventive measures may include being flexible with delivery dates or considering air freight.

In more severe cases Jack Wolfskin has reduced orders to alleviate pressure in discussion with their sourcing team.

In all cases Jack Wolfskin discusses root causes with the supplier and tries to find long-term solutions. For example, if material delay has been identified as a key issue, the brand has facilitated closer collaboration between Jack Wolfskin, the fabric supplier and the CMT supplier. Staff responsible for order placement are involved in extensive discussions on the planning process. In other cases Jack Wolfskin has offered training on production planning to the supplier. All suppliers are asked to plan based on 8-hour working days. Traveling staff such as technicians try to provide guidance whenever they visit a production site.

As a standard practice, all fabric delivery delays are analysed and linked back to excessive overtime findings during supplier evaluations. This prevents the CMT supplier receiving negative ratings for factors outside of his control.

Progress is monitored in annual audits.

In one case where it was not possible to reduce overtime hours sufficiently after a lengthy process, Jack Wolfskin decided to switch to a different production location.

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:** Jack Wolfskin conducts detailed cost calculations per style that include material, supplier margins and CMT costs as well as working minute estimates. Jack Wolfskin does not have insights into the exact cost of labour, since labour cost per garment is included in the CMT package and not specified.

Sourcing staff is actively informed about current wage levels, target wage increases and changes in legal minimum wage and considers this during price negotiations. Sourcing staff is also authorized to make product engineering decisions, which means adjusting designs based on supplier feedback to ensure certain price limits are not exceeded. Jack Wolfskin could demonstrate that they increased their payment for CMT costs for carry-over styles to accommodate minimum wage increases. The brand has also raised retail prices, when necessary.

Jack Wolfskin is aware of minimum wage levels and cross-checks through audits (in most cases conducted annually) whether all suppliers pay at least a legal minimum wage.

**Recommendation:** Fair Wear recommends Jack Wolfskin to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

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:** No payment below legal minimum wage was documented by Fair Wear during Jack Wolfskin's last financial year. A limited number of cases where other legal benefits were not extended to workers, such as paid leave or overtime payment, was documented. These have been addressed by Jack Wolfskin as part of its monitoring system. A court case around severance pay is pending.

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

**Comment:** Jack Wolfskin has written payment term agreements with suppliers ranging from 7 to 45 days. No late payments to suppliers were documented by Fair Wear.

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:** Jack Wolfskin has audited (almost) all its production locations and is therefore aware of wage levels in its supply chain. As part of its supplier evaluations and during audit follow-up wages are discussed with suppliers.

For Vietnam and Bangladesh, Jack Wolfskin's main production countries, the company has conducted an in-depth analysis of current wage levels, mapped the results against living wage benchmarks and defined a target wage. Suppliers have been informed about the outcome of the analysis and the defined target wage. Next steps to increase wage levels in collaboration with suppliers were planned for 2020.

Jack Wolfskin's overall strategy regarding wage increases involves building long-term, committed business relationship that allow the supplier more reliability in their financial planning.

**Recommendation:** Fair Wear encourages Jack Wolfskin to continue discussions with suppliers about different strategies to work towards higher wages, especially in cases where living wage benchmarks have not been reached yet. Fair Wear encourages Jack Wolfskin to involve worker representatives and local organisations in assessing root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

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).	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 member company's score.	Supplier information provided by member company.	N/A	2	0

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:** Jack Wolfskin has defined target wages for two key sourcing countries, Bangladesh and Vietnam. In both cases the target wage is defined as 170% of the legal minimum wage. Jack Wolfskin has decided on this target without consulting their suppliers, but has analysed stakeholder benchmarks.

For Vietnam, the estimate of the Global Living Wage Coalition (2016) was the main reference point (172% of legal minimum wage for region 1).

For Bangladesh, the defined target wage of 13,600 Taka is below the Global Living Wage Coalition living wage estimate for Dhaka (16,460 Taka) or the trade union demand of 16,000 Taka for locations outside of Dhaka.

Several suppliers meet the target wage set by Jack Wolfskin. As explained under indicator 1.8, Jack Wolfskin cannot yet fully demonstrate the link between their buying price and wage levels.

**Recommendation:** Fair Wear recommends Jack Wolfskin to determine target wages that meet or exceed estimates recommended by Fair Wear in its Living Wage policy. In determining what is needed and how wages should be increased, it is recommended to involve worker representation and suppliers.

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	26%	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:** As Jack Wolfskin cannot document how its buying prices link to wage levels (see indicator 1.8), it is difficult to assess whether the member company pays its share of the target wage.

However, Jack Wolfskin could demonstrate that the majority of workers at several of its suppliers are paid a living wage. One location in Bangladesh and four locations in Vietnam where the majority of workers received a base wage meeting or exceeding the Global Living Wage Coalition estimate are therefore counted towards this indicator.

**Recommendation:** Linked to the recommendations under indicator 1.8 and 1.13, Fair Wear recommends Jack Wolfskin to ensure their prices are sufficient to pay for its share of an ambitious target wage.

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## **Purchasing Practices**

**Possible Points: 47**

**Earned Points: 31**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of own production under standard monitoring (excluding low-risk countries)	99%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	0.2%	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.	Yes	
Requirement(s) for next performance check		
Total of own production under monitoring	99%	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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Yes	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.	0	0	-1

**Comment:** Jack Wolfskin uses Fair Wear audits and audits by its monitoring partner Sumations to audit its supply chain. Sumations has received training by Fair Wear.



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:** Jack Wolfskin shares corrective action plans with suppliers and establishes improvement timelines in a timely manner. Whenever possible, worker representatives are included in closing meeting of audits (where corrective actions are discussed), but do not systematically receive a copy of the corrective action plan.

**Recommendation:** Fair Wear recommends Jack Wolfskin to share the corrective action plan with worker representatives. 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:** Jack Wolfskin conducts annual audits at most production locations and monitors follow up closely. Depending on the issue this may include asking suppliers for status updates including collecting evidence of improvements, monitoring visits by CSR staff or their their monitoring partner Sumations, which received training by Fair Wear or asking travelling staff to report on improvements. Jack Wolfskin's supplier rating and internal monitoring system include automatic reminders of unresolved corrective actions.

The brand also assesses whether their behaviour may have contributed to a violation and makes adjustments in their policies or practices if needed.

While follow-up is always geared toward the individual situation of each supplier, Jack Wolfskin at time also tries to prevent and address common issues or risks. For example, Fair Wear's guidance on age verification systems to prevent child labour was shared with all production locations in Myanmar. The focus of Jack Wolfskin's remediation efforts is to achieve lasting improvements.

For the corrective action plans discussed during the Brand Performance Check, Jack Wolfskin could demonstrate extensive follow up and progress in resolving corrective actions. More complex issues such as excessive overtime, gender-based violence as well as ensuring independent worker representation is in place were at times still in progress of being resolved.

**Recommendation:** Fair Wear recommends Jack Wolfskin to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

Fair Wear encourages Jack Wolfskin to assess how it can transfer learnings how to resolve and prevent common issues more systematically to other production locations in their supply chain.

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.	99%	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:** Almost all production locations have been visited by Jack Wolfskin staff in the previous financial year.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	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.	N/A	3	0

**Comment:** Jack Wolfskin did collect audit reports of new footwear suppliers that had to be added on short notice. The quality of the report was limited and audits by its monitoring partner Sumations were planned shortly after starting production.

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.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Advanced			6	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** All of Jack Wolfskin's production location in Bangladesh have been audited by either the Accord or Alliance. Remediation status is currently at 90%. All suppliers also received training by Fair Wear on fire and building safety. Jack Wolfskin is however not an Accord member.

Jack Wolfskin also discussed how to prevent and address gender-based violence with their main supplier and asked them to consider participating in Fair Wear training on the issue. The supplier explained that they have implemented their own training programme which includes establishing sexual harassment counselors on each floor. Training material has been shared with Fair Wear's local team for assessment, who commented that the material did not seem fully tailored to garment workers and examples were generic. The team was invited to observe a training, however the training they attended was about worker rights in general, not specific to gender-based violence and harassment. Fair Wear can at this point not determine the effectiveness of the factories internal system.

The other locations have not participated in Fair Wear's gender-based violence prevention programme in the past three years.

Cases of abuse have been documented in several of the locations.

Jack Wolfskin has implemented monitoring requirements established by Fair Wear for production in Myanmar. Jack Wolfskin places particular emphasis on freedom of association and is trying to stimulate constructive collaboration between their suppliers and unions. Two locations have started Fair Wear's WEP communication training. Jack Wolfskin has published aggregated audit results of Myanmar production locations on its website and shares information on wage levels in its social report. A common risk in Myanmar is that trainee workers are paid below legal minimum wage, which is legal under Myanmar law. Jack Wolfskin determined that one of their production locations follows this practice and reached an agreement with them to phase this out by the beginning of 2020.

Jack Wolfskin sources less than 2% of its total production from one production location in Turkey. The supplier was informed by Jack Wolfskin about possible labour rights violations linked to employing Syrian refugees. An audit confirmed that the supplier does not employ Syrian refugees, does not subcontract production and works with a stable workforce. While the issue does not impact Jack Wolfskin's supplier, the brand nevertheless supported a joint letter that Fair Wear and other organizations wrote to the Turkish government to advocate for a legal framework to employ Syrian refugees.

Beyond implementing country-specific monitoring programmes and policies established by Fair Wear the company has a robust risk management system in place. Jack Wolfskin is well-informed about common risks in their sourcing countries, e.g. by reading Fair Wear country studies, attending webinars and analysing other available sources. Risks are mainly managed by monitoring almost all production locations annually. A supplier in Italy is monitored carefully to mitigate the risk of labour violations linked to Chinese migrant workers in Italian factories - which were not found at Jack Wolfskin's production locations so far. In addition, Jack Wolfskin also tries to address systemic issues such as limited freedom of association in China and Vietnam with their suppliers.

**Requirement:** Fair Wear requires Jack Wolfskin to assess whether the programme established by their main Bangladeshi supplier has resulted in a functional system to promote gender equality and prevent gender based violence. Fair Wear's local team has extensive experience on supporting both employees and employers in setting up anti-harassment systems and could support Jack Wolfskin with this assessment upon request.

Jack Wolfskin should ensure that all their Bangladeshi production locations have a functional system in place.

**Recommendation:** Fair Wear encourages Jack Wolfskin to further strengthen their risk management system by continuing to stimulate meaningful ways of worker representation, particularly in Vietnam and China where legal restrictions on freedom of association and collective bargaining are in place.

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.	Active cooperation	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.	2	2	-1

**Comment:** Jack Wolfskin has shared audit reports conducted by their monitoring partner with other Fair Wear members and has participated in Fair Wear audits at production locations shared with other Fair Wear member brands. Jack Wolfskin could demonstrate coordinated follow-up of corrective actions at shared suppliers.

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% AND member undertakes additional activities to monitor suppliers	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.	3	3	0

**Comment:** Jack Wolfskin sources from six production locations in Slovenia, Italy and Germany. Monitoring requirements were fulfilled for all sites. In addition, Jack Wolfskin conducted full social audits at some of these production locations.

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).	Yes	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.	2	2	0

**Comment:** Jack Wolfskin has monitored 99% of its supply chain, including conducting audits at several tail-end production locations.

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

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## Monitoring and Remediation

**Possible Points: 29**

**Earned Points: 26**

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### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check	9	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	7	
Number of worker complaints resolved since last check	6	

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

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.	Yes	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:** Jack Wolfskin has set up a systematic process to provide the Fair Wear Worker Information Sheet to suppliers. Their monitoring partner as well as staff check during visits (at least annually) if the CoLP has been posted.



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.	25%	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.	4	6	0

**Comment:** 16 production locations of Jack Wolfskin, 25% of their production volume in high-risk countries, completed Fair Wear's Workplace Education Programme Basic module in the past three financial years.

**Recommendation:** Fair Wear recommends Jack Wolfskin to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. Jack Wolfskin should ensure good quality systematic training of workers and management on these topics. To this end, members can either use Fair Wear's Workplace Education Programme (WEP) basic module, or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear 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	Yes + Preventive steps taken	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.	6	6	-2

**Comment:** During Jack Wolfskin's last financial year 13 complaints were newly received or in the process of being remediated (received in previous financial years). Reports on each complaint are available on Fair Wear's website.

Jack Wolfskin has shown fast engagement in accordance with Fair Wear's complaint procedure in all cases. They have set up fixed calls every other week with their Fair Wear contact person to stay updated about developments and action points.

Jack Wolfskin is also working to prevent issues from re-occurring by stimulating long-term, systemic improvements. For example, in one case Jack Wolfskin agreed with the suppliers to train workers on freedom of association and to organise a worker representative election. In another case concerning abusive behaviour by supervisors, training was organised and Jack Wolfskin discussed what structures are in place at other locations of the same suppliers to prevent abusive behaviour.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	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.	2	2	0

**Comment:** Most complaints were received by suppliers shared with other Fair Wear members. Jack Wolfskin cooperated actively with these brands in all cases; in one case collaboration also included a member of the Fair Labor Association.

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## Complaints Handling

**Possible Points: 17**

**Earned Points: 15**

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## 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:** Fair Wear membership is included in the introduction programme for new staff.

Staff working in Jack Wolfskin stores is trained twice a year. Their training includes two hours of information on Fair Wear.

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:** All staff working directly on the product and with production sites receives regular training on social and environmental standards. Details about Fair Wear's work are explained such as the Code of Labour Practice and how to read an audit report.

Staff that visits production locations is explicitly trained on health and safety and on how to use the Fair Wear health and safety checklist. This enables them to assess progress on issues that can be verified physically during their visits at the production site. After their return, staff reports back to CSR about their findings. During its last financial year, Jack Wolfskin increased local capacity in China and Vietnam and trained these staff members as well.

In addition technicians and other departments involved in production are included in supplier evaluations. They also at times participate in audits to know how Fair Wear membership works in detail at the production site.

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 + actively support COLP	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.	2	2	0

**Comment:** Jack Wolfskin has one agent for one production location in Indonesia. The person is well informed about Fair Wear's Code of Labour Practices. As Jack Wolfskin is also in direct contact with the factory, CoLP implementation efforts are mainly led by the brand itself.

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.	27%	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.	4	6	0

**Comment:** Five production locations of Jack Wolfskin in Vietnam and Myanmar participated in Fair Wear's WEP Communication module. A production location in Bangladesh has participated in Fair Wear's WEP violence-prevention module. Six production locations in Vietnam, Cambodia and Indonesia participated in the ILO Better Work programme, which is counted towards this indicator. Together these locations account for 27% of Jack Wolfskin's production volume

Jack Wolfskin indicated that several other production locations have participated in training programmes initiated or conducted by other brands, but were not permitted to share additional information with Jack Wolfskin. Therefore it cannot be assessed whether these training programmes can count toward the indicator.

**Recommendation:** Fair Wear recommends Jack Wolfskin to continue implementing training programmes that support factory-level transformation such as improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions. To this end, members can make use of Fair Wear's Workplace Education Programme Communication or violence prevention module or implement advanced training through service providers or brand staff. Fair Wear's guidance on good quality training is available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No follow-up	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.	0	2	0

**Comment:** No follow up steps were implemented by Jack Wolfskin after the violence-prevention module (conducted in December 2017). The Communication training programmes, in which several locations participated, consist of several sessions and were still on-going in 2019. Follow up will be assessed in the next Brand Performance Check.

**Recommendation:** For the violence prevention module, Fair Wear recommends members to check whether their supplier conducts regular anti-harassment committee meetings, whether an external expert attends these meetings and whether complaints are reported to the committee. The member should also communicate to suppliers that reported incidents will not result in negative consequences (such as withdrawing orders) as long as the factory investigates and remediates them accordingly. Jack Wolfskin could also check whether committee members and management are organizing awareness raising activities about sexual harassment and whether re-elections of the committee and/or re-training are needed, e.g. due to worker turnover.

For the WEP Communication module, Fair Wear recommends Jack Wolfskin to discuss what steps management is planning to further strengthen dialogue between workers and management. This may include holding an independent worker representative election; regular meetings between worker representatives and management to discuss improvements to working conditions or allowing worker representatives to conduct a worker survey on specific issues.

If applicable, the member should also investigate how they can contribute to implementing the action plan workers and management have agreed on (e.g. by adjusting sourcing practices).

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## **Training and Capacity Building**

**Possible Points: 13**

**Earned Points: 9**

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## 5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations	Advanced	Any improvements to supply chains require 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.	6	6	-2

**Comment:** Jack Wolfskin has a supplier information system which includes all suppliers and their subcontractors. A supplier list is available on Jack Wolfskin's website. Jack Wolfskin allows its suppliers to use subcontractors but only after the supplier has the company's permission. This rule is shared with the supplier from the beginning of the business relationship.

Jack Wolfskin visits (almost) all production locations annually, including subcontractor. As part of Jack Wolfskin's policy, subcontractors are also audited.

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:** All departments have access to suppliers' information and meet regularly to exchange updates.

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## Information Management

**Possible Points: 7**

**Earned Points: 7**

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## 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

**Comment:** Fair Wear membership is communicated in compliance with Fair Wear's communication policy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities	Supplier list is disclosed to the public.	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.	2	2	0

**Comment:** Jack Wolfskin published last year's Brand Performance Check on its website as well as a list of direct suppliers.

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 AND published on member's website.	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.	2	2	-1

**Comment:** Jack Wolfskin has submitted a social report on its last financial year to Fair Wear and has published the report on its website.

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## Transparency

**Possible Points: 6**

**Earned Points: 6**

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## 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:** CSR regularly exchanges information with top management about Fair Wear membership and CSR-related issues. After key moments such as the annual Brand Performance Check Fair Wear membership and necessary steps are also discussed.

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.	100%	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:** The last performance check included two requirements.

- 1) In the tail end of Jack Wolfskin's supplier base, Fair Wear requires Jack Wolfskin to ensure it audits all production locations where the member has more than 10% leverage.
  - 2) Fair Wear members sourcing in Myanmar are required to develop and publish wage ladders for each factory where production takes place.
- Jack Wolfskin has implemented both requirements.

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## Evaluation

**Possible Points: 6**

**Earned Points: 6**

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## Recommendations to Fair Wear

Jack Wolfskin is part of Fair Wear's member expert committee. They would like Fair Wear to consult the committee on strategic matters.

Jack Wolfskin would like Fair Wear to connect more closely with members to align responses on activist campaigns targeting brands.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	31	47
Monitoring and Remediation	26	29
Complaints Handling	15	17
Training and Capacity Building	9	13
Information Management	7	7
Transparency	6	6
Evaluation	6	6
Totals:	100	125

### Benchmarking Score (earned points divided by possible points)

80

### Performance Benchmarking Category

Leader

## Brand Performance Check details

Date of Brand Performance Check:

25-05-2020

Conducted by:

Lisa Suess

Interviews with:

Melanie Kuntznawitz, Head of Vendor Control