



Brand Performance Check

Greiff Mode GmbH & Co.

Publication date: February 2021

This report covers the evaluation period 01-05-2019 to 30-04-2020

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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Brand Performance Check Overview

Greiff Mode GmbH & Co.

Evaluation Period: 01-05-2019 to 30-04-2020

Member company information	
Headquarters:	Bamberg , Germany
Member since:	2015-03-15
Product types:	Workwear
Production in countries where Fair Wear is active:	China, North Macedonia, Romania, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Germany, Morocco, Pakistan, Republic of Moldova, Ukraine
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	85%
Benchmarking score	74
Category	Good

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

GREIFF has shown progress and met most of Fair Wear's performance requirements. With a monitoring percentage of 85%, GREIFF goes beyond the 80% required after its third year of membership. With a benchmarking score of 74 points, Fair Wear places GREIFF in the 'Good' category.

GREIFF has a strong sourcing system that is systematically integrated with its implementation of the Fair Wear Code of Labour Practice. Long-term relationships with many suppliers, combined with often high degrees of leverage and regular visits to production sites, mean GREIFF is in a good position to work on the implementation of social standards.

Due to its production locations mainly outside of Fair Wear focus countries, GREIFF works closely with the company Sumations which conducts audits, training and helps with the follow up of corrective actions. Sumations is well-briefed on Fair Wear requirements, which are followed as best possible.

One long-term production site in Romania making up 11% of GREIFF's production volume has faced a worker shortage for years. After in-depth discussions it was decided to leave the factory and to establish a new production site in another country in 2018, where shortage of workers is not a common problem. The termination process was as required by Fair Wear. This switch in suppliers can remarkably be seen in several indicators throughout this Brand Performance Check where GREIFF loses points in comparison to last year. Especially in the first indicators in chapter 1 but also when looking at the monitoring threshold. The monitoring threshold fell from 96 to 85 at the new production site in Ukraine, where an audit was not possible to be conducted before the outbreak and restrictions of the covid-19 pandemic. A 2015 BSCI audit report of poor quality is in hand and working conditions are being discussed during visits as well as possible without a report / with an old report of poor quality in hand.

GREIFF has a good understanding of production planning processes, overtime at the production sites could not be found. Looking at wages, GREIFF's pricing practice provides the brand valuable insight on the labour minutes needed per product. This needs being brought together with labour minute costs to be able to judge whether the wages paid are enough to pay a minimum wage and then evaluate the gap needed to pay living wages. This is the biggest challenge for GREIFF to work on in the coming years.

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.	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 2019, GREIFF continued to work with its four main suppliers from Bosnia, Ukraine, Morocco and Romania. GREIFF aims to work with small to medium suppliers where it can have significant leverage. At most of its suppliers, GREIFF has considerable leverage, giving them the opportunity to influence working conditions.

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.	2%	Fair Wear 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 Fair Wear.	3	4	0

Comment: In 2019, GREIFF bought 2% of its production volume from production locations where it buys less than 2% of its total FOB. This is a drop from 5% and shows that GREIFF has again managed to consolidate its supply base limiting its number of suppliers in hence its 'tail end' in the past financial year. GREIFF sources small quantities of specific products like ties and caps from these suppliers to offer its costumers a complete product range.

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.	81%	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: GREIFF bought 81% of its production volume from production locations where a business relationship has existed for at least five years. GREIFF has a strategy that prioritizes building long term relations with their suppliers.

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: In its financial year 2019/2020, no new production locations were added to GREIFF's supply chain.

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: Since February 2019, GREIFF distributes a sustainability guideline with all its suppliers. This guide includes GREIFF's own internal sourcing policies and has integrated the Fair Wear Code of Labour Standards, which all suppliers need to confirm and sign.

In the past financial year, GREIFF did not work together with a new supplier. However, in general, when selecting new suppliers, GREIFF tries to stay in countries where they are already active and have done a risk analysis as part of their due diligence approach. Additional visits to all new suppliers are conducted before placing bulk orders and labour standards are discussed. Any existing audit report is requested and its quality checked. Experience is that the quality of the report differs a lot and that most of them do not contain enough information to thoroughly be able to follow up on findings. GREIFF conducts a Health and Safety Check with the Fair Wear Health and Safety checklist. GREIFF also checks the factory wage level at new suppliers to ensure that at least legal minimum wage is paid. The collective outcome of these checks provides GREIFF with enough information to make sourcing decisions.

GREIFF selects small and medium production locations where GREIFF has significant leverage and also looks for factories where other Fair Wear members source from.

As part of its membership in the Alliance for Sustainable Textiles (Textilbündnis, Germany) since 2015, a risk analysis is made for all of countries sourced from. As a member of this German alliance Greiff has access to the new online tool called T-Rexs where all risks of all production countries are well defined and always kept updated. T-Rexs is used as an extra source of information.

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: Since 2018, GREIFF has an integrated evaluation system for each production location to collect information and to ensure smooth communication. This evaluation includes supplier prices, quality of the product, timelines of delivery, and the supplier service.

GREIFF organizes supplier evaluations several times per year with relevant staff to discuss current issues at production locations and evaluate supplier progress with regard to CAP follow up. Evaluation of service is based on ease of working relations, trust, openness and responsiveness. Quality is checked in-house and suppliers are also evaluated on performance, which includes deliveries and delays. Additionally, GREIFF evaluates compliance with the Code of Labour Practices, checking whether the questionnaires are filled in, the Worker Information Sheets posted. GREIFF visits the factories and discusses labour standards. GREIFF collects audits in a systematic way and discusses and monitors CAP follow up.

Through this evaluation, GREIFF has started a categorical overview of performance indicators at suppliers. This overview provides information during discussions of which suppliers to continue working with, highlighting the risks and where need be start placing a responsible exit strategy (which exists in a written policy). The supplier evaluation is used often throughout the year and is available as an open tool for all colleagues.

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: GREIFF has two types of products: Never Out of Stock-items (NOS, 80%) and specific products that are being ordered by customers (20%). The catalogues of the NOS- items have a validity of two years and therefore, it does not have a high or low season. GREIFF provides its suppliers with a 12-months forecast of its production planning for the NOS products (always in December for the coming year). This planning is based on input from the production locations about their available hours per month per location per production stage. The actual order placement can differ by about 20 per cent. Last-minute changes are rare.

The lead time for suppliers from Europe and Africa is 10 weeks. GREIFF buys the fabric and sends it to the factories. For Pakistan and Vietnam lead time is between 16 to 26 weeks, these production locations supply ready-made garments.

GREIFF has a large stock and is capable of responding to clients' demands. This enables GREIFF to accept some degree of a delay from the suppliers that supply the NOS-items. For these items, the production status is reconfirmed on a daily basis. Delays of fabric are monitored and handled by GREIFF. It does not influence the lead time for its suppliers.

GREIFF calculates the standard minutes per style and has started to relate it to the production capacity of several of its most important suppliers. GREIFF struggles with worker retention, especially in Eastern Europe where factories have a hard time retaining workers and keeping a stable production force so that the production process is not affected.

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: GREIFF has a general insight in which production countries overtime is an issue. In general, GREIFF accepts delays in delivery because GREIFF has some flexibility with their planning. Due to its high stock amount, GREIFF is able to delay some of their recurring NOS orders which usually can be moved to less busy months. GREIFF prioritizes customer orders before their NOS orders. In case of urgency, part delivery via airfreight at company expenses is possible.

GREIFF had no cases of excessive overtime reported in the audits conducted in the financial year 2018-2019. However there were no audits conducted in this time period in the production countries China and Vietnam where excessive overtime is a common problem to be found during audits. However these production sites account for not even five percent of the brand's total FOB.

GREIFF focuses on supporting planning at suppliers and strengthening communication with suppliers throughout the entire production timeline in order to foresee any potential delays or production pressure. In 2017, GREIFF invested in an interest-free credit for buying new and efficient machinery to increase the productivity at Bosnian suppliers that experienced production pressure. In 2018, GREIFF added another supplier to its production portfolio to ease production pressure due to shortage of workers in production locations in Eastern Europe.

Recommendation: Fair Wear recommends to collect information about overtime at all suppliers.

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: Every year GREIFF conducts wage checks at all suppliers: the lowest, average and highest wages paid to workers are collected. Wage ladders and country studies are used as background information. GREIFF negotiates recurring basic model prices after legal minimum wages have been met. In case needed, cost reduction is achieved through the quality of the fabric used or in the layout and cutting of the product.

To know the minutes needed to produce a single item, GREIFF uses the requirements of the "German Fashion union" which sets standard production minutes for different production steps. Knowing the minutes per production step allows GREIFF to know the production minute per style.

GREIFF calculates the price break down per style and is aware of the percentage of the labour cost in general. Aside knowing the production minutes per style, GREIFF cannot demonstrate a clear understanding of the labour cost components of its buying prices. Labour costs are not fixed.

For the suppliers in Bosnia, Ukraine, Romania and Morocco GREIFF showed that there was an increased labour price. In general, GREIFF is aware of when and how much increase in salary the suppliers are paying their workers. The wages increased are consistently checked through external audits conducted by Sumations.

Requirement: GREIFF needs to ring fence how much of their pricing contributes to payment of wages.

Recommendation: Fair Wear recommends GREIFF to expand their knowledge of cost break downs of all product groups. A next step would be 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. First priority would be to make sure this level of transparency can be achieved with their suppliers.

GREIFF is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown.

GREIFF could provide suppliers who don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs.

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.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear 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, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

Comment: GREIFF conducts wage checks on a yearly basis, where wage information is gathered and compared to the country minimum wage benchmark. As part of their sourcing strategy, GREIFF has the policy not to work with suppliers that pay below minimum wage.

In the past financial year, there was no failure to pay legal minimum wages issues reported at any of their suppliers. Wages are frequently checked during audits, mainly conducted by Sumations.

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: There is no evidence of late payments to suppliers by GREIFF.

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: GREIFF annually gathers wage reports from suppliers, which are cross-checked with the wage ladder tool and in the audit reports. Additionally, GREIFF uses Fair Wear's country studies as well as information from the Clean Clothes Campaign to get the wage estimates; country profiles that include wages estimates with the wage on average, and lowest wages of workers.

GREIFF has discussed the future of wages with its suppliers, including different strategies to work towards higher wages. For example, in Ukraine due to fluctuating currency, GREIFF agreed-upon price ranges to assure consistent wages, this is to take into account the unstable currency which frequently drops from month to month. During an audit conducted by Sumations in Bosnia, it became clear that the prices paid were 7% too low to enable the supplier to pay at least minimum wages. Without hesitation, the wage increase was implemented with the ongoing order. Whether this increase of 7% is enough to pay a living wage was not evaluated.

The production sites in Vietnam and China have not been audited and no evaluation here is possible.

Requirement: GREIFF must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. GREIFF is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

Principle is that production sites must be audited to know the current situation on wages.

Recommendation: Fair Wear encourages GREIFF to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with the suppliers where the member is responsible for a large percentage of production and long-term business relationship.

Fair Wear encourages GREIFF to also involve worker representatives and other local organisations in assessing root causes of wages lower than 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).	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

Comment: GREIFF does not own any of its factories.

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	6	0

Comment: GREIFF was able to show increase in prices at their supplier, which was also cross-checked during Sumation audits. GREIFF has regular communication with production facilities on wages and adjusts prices accordingly. During an audit conducted by Sumations in Bosnia, it became clear that the prices paid were 7% too low to enable the supplier to pay at least minimum wages. Without hesitation, the wage increase was implemented with the ongoing order. Whether this increase of 7% is enough to pay a living wage was not evaluated.

GREIFF had initial discussions with suppliers about setting a target wage. The brand does not calculate the difference between the lowest paid wages and the living wage benchmarks.

Price discussions are part of production site visits. GREIFF cooperates with other Fair Wear members at shared factories.

Requirement: GREIFF should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

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.

Fair Wear advises 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.

In case Fair Wear members are interested to develop a joint approach to improve wages at a shared supplier, Fair Wear can give advice on measures that need to be taken by GREIFF to ensure compliance with anti-trust/anti-competition legislation in relevant jurisdictions.

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.	0%	Fair Wear 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.	0	6	0

Comment: GREIFF could show evidence of wage discussions with suppliers but has not yet set a target wage with one or more of its suppliers.

Requirement: GREIFF is expected to begin setting a target wage for its production locations.

Purchasing Practices

Possible Points: 50

Earned Points: 32

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	0%	
% of production volume where approved external audits took place.	78%	
% of production volume where Fair Wear audits took place.	0%	
% of production volume where an audit took place.	78%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	7%	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.)
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	85%	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 Fair Wear 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 CSR manager works closely with a product manager who supports sustainability on technical production. Additionally colleagues from purchasing are closely involved. Together they are responsible for 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 Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear 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: Fair Wear 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: Once completed, the audits and CAPs are shared and timelines are established with factory management. There is still no involvement of worker representatives during the CAP follow-up mainly because they are yet to be properly established. GREIFF always tried to have a representative present when the auditors visit the production location.

Recommendation: Before an audit takes place, GREIFF 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. If not, discussions for establishing consistent worker representatives can be started. 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	Fair Wear 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: GREIFF conducts the majority of their audits through Sumations. GREIFF was able to show the audit quality assessment tool and CAPs provided for audits conducted by Sumations. GREIFF has created a collated overview where the CAP follow up progress has been tracked over the years per supplier. GREIFF discusses progress during visits and uses the timelines to set deadlines and regular reminders to suppliers for updates. The technical manager confirms changes to progress of remediation in person during visits and also discusses and open outstanding points from the CAP.

A video in collaboration with the state fire department was created at GREIFF's Ukrainian supplier, where efforts to improve the fire and safety hazards were addressed.

Recommendation: Fair Wear encourages GREIFF to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices. Additionally, GREIFF could gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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 GREIFF's production volume has been visited by the company 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.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

Comment: Aside asking Sumations to conduct audits in line with Fair Wear requirements, GREIFF collects audit reports from other sources. With Sumation audits, GREIFF makes no difference to Fair Wear audit reports, see indicator 2.4 for more information.

GREIFF does not see the audit quality of other external sources aside Sumations as good enough to work with but faces the problem that in some countries neither Fair Wear nor Sumations is active and can provide qualitative audits. In some cases GREIFF hence uses such audits of poor quality as interim solution to work on corrective actions. However the quality usually does not allow good follow up. GREIFF is aware of this problem and works hard to find better solutions.

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 Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	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.	3	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	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	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: In 2019/2020, GREIFF did not source from Bangladesh and Myanmar and does not make any use of abrasive blasting. As a change from the past financial year, GREIFF also does not source from Turkey anymore.

For country assessments, GREIFF uses country studies, country profiles from the Clean Clothes Campaign, additional risk assessment based on agent information and experience and finally through in-country visits by the technical manager to multiple suppliers to get a grasp of ongoing industry issues. Being associated to the Alliance for Sustainable Textiles (Textilbündnis, Germany), GREIFF has access to T-Rexs which shows brut and net risks per country.

In Eastern Europe, GREIFF has identified the declining worker population as a major risk. GREIFF is experiencing an aging working population with an overall decrease in workers at suppliers within this region.

GREIFF is aware of the general risks sourcing in Morocco, but as GREIFF sources from only one supplier in Morocco, the company mainly focuses on problems occurring at the production site.

In Pakistan, GREIFF worked with another Fair Wear member at their shared supplier on a project as part of their German textile partnership activities. The aim of this project is to enhance suppliers' performance with regards to social and environmental standards as well as productivity and quality levels. The supplier receives training, workshops and one-on-one coaching and an external party reports about progress with regard to the labour standards in a detailed way with monthly follow up and discussions within the factory. The program supported the Pakistani facility in the preparation of the SteP by OEKO-TEX certificate, which was successfully completed in November 2018. The program measures and supports remediation towards issues including child and juvenile labour, wage and benefits, employment relationship, freedom of association, collective bargaining agreements and working hours including overtime. After closing the project in 2018, the supplier informed GREIFF that they kept conducting several trainings on their own initiative. Training reports were shared with GREIFF and covered topics such as electrical safety, environmental topics, first aid and health and safety, fire fighting training, training of trainers, evacuation and fire drill. Staff working for this production site were asked by the management to train its co-workers and to bring in own knowledge. This is what determined the course of classes.

The risks for the production sites in Vietnam and China are analyzed in general but not on factory level.

Recommendation: It is strongly recommended to verify working conditions at the production sites located in Vietnam and China and to work towards remediation of possible country specific findings.

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: GREIFF collaborated with two other Fair Wear Foundation members in 2019/2020 at three production sites in Pakistan and Macedonia and Bosnia.

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.	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. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

Member undertakes additional activities to monitor suppliers.: No (o)

Comment: GREIFF sources from three production sites located in so called low-risk countries. Monitoring requirements for these three production sites in low-risk countries are fulfilled.

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	Fair Wear 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 Fair Wear and recent Audit Reports.	2	2	0

Comment: Five production sites fall under the tail-end production locations. At two making a total of 1.14% of the production volume an audit was conducted and report / CAP followed up upon.

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.	Yes	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	1	2	0

Comment: GREIFF has an outlet in Bamberg where 76 external brands are sold. The questionnaires are sent to all these external brands. 64% of the total external sales volume signed and returned the questionnaires for external brands.

Recommendation: Fair Wear recommends GREIFF to collect the signed questionnaires from all external brands.

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).	4%	Fair Wear 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 Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	1	3	0

Comment: One external brand is member to Fair Labour Association. Two are member to Fair Wear. In total this makes 3.71% of the total external sales volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear 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: 35

Earned Points: 28

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 Fair Wear 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 CSR manager (and were necessary the CEO) is involved in complaint handling.

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 Fair Wear 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: GREIFF has made sure that the Fair Wear CoLP and complaints hotline are posted in the factory. The posting of the Worker Information Sheet is checked during all visits and audits at the production locations.

Additionally, the new sustainability policy created in 2018, was distributed amongst all suppliers, fabric suppliers and agents who work with GREIFF.

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.	81%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: GREIFF organized a basic level external training through Sumations for 81% of their suppliers which count towards this indicator.

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 Fair Wear 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: 9

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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: GREIFF makes use of their internal intranet workplace to inform all staff of activities including Fair Wear membership. Additionally, GREIFF publishes a CSR brochure available for staff and customers where Fair Wear membership is publicized. Lastly, the CSR manager sends an information email on any updates, there have been organized in-house training in collaboration with hessnatur-Stiftung.

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 Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: GREIFF makes use of the sustainability policy which is distributed to the purchasing team as well. There is also internal CSR material and labour policies where further information on Fair Wear requirements are discussed. GREIFF has regular meetings internally and also participates in different Fair Wear seminars, webinars and stakeholder meetings to make sure the responsible staff stays informed.

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, Fair Wear audit findings.	2	2	0

Comment: GREIFF is in direct contact with all its production sites. No matter whether an agent is involved or not. Communication is with the agent and supplier at production sites located in Macedonia, Vietnam and Romania.

GREIFF's agents also have to sign the company's sustainability policy with additional agents related sourcing policies and requirements. These include policies against change in production locations without agreement and anti-subcontracting agreements. The agents also agree with Fair Wear's Code of Labour Practices and support its implementation at production facilities through regular checks of posted information sheets.

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. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: None of the production sites participated in training programmes that support transformative processes related to human rights.

Recommendation: Fair Wear recommends GREIFF to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, 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 and structural change to improve working conditions. To this end, GREIFF can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist 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.	Active 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.	2	2	0

Comment: GREIFF follows up on training conducted through calls with suppliers, and have a feedback loop were suppliers can report on the outcomes of the training and remaining needs. GREIFF also has close contact with Sumations who conducted some of the trainings, where a follow-up report and outcomes are discussed.

Training and Capacity Building

Possible Points: 13

Earned Points: 7

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: Since 2018, GREIFF has a specific written agreement with all suppliers against subcontracting which is encompassed in the sustainability policy. All suppliers and agents were informed of these policies in 2018 already. Subcontracting is discussed in the bi-annual visits to suppliers. The Quality Controller in-house checks any inconsistency in the sewing and the technical manager frequently visits production locations to see products in the line. All the questionnaires were completed, there were no new subcontractors in this financial year. Previously found subcontractors from the previous year have been added into their supplier register on the database.

Audits conducted in 2019/2020 do not indicate any hidden subcontracting.

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: The CSR and other relevant staff at GREIFF use the office intranet, calls and regular meetings to share all information with each other about working conditions at production locations.

Information Management

Possible Points: 7

Earned Points: 7

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	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: Greiff communicates about Fair Wear on its website, in tenders and to its customers. On the MyGREIFF website, in the online and printed version of the CSR Brochure, there was one unclarity found about audits "completed by Fair Wear Foundation". After the Brand Performance Check, the CSR manager has changed the text on the website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear'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.	1	2	0

Comment: GREIFF is transparent through MyGREIFF. The myGREIFF-Code can be found on a label on every our NOS-garments. Using the myGREIFF code, the customer knows all steps of the production chain on country-level. In addition to this, GREIFF publishes its brand performance check report.

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 Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: GREIFF has submitted their social report and published it on their website.

Transparency

Possible Points: 6

Earned Points: 5

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 Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Evaluation of the Fair Wear membership is conducted in close collaboration between the CSR manager and top management. The CEO is actively involved in the Fair Wear membership and supports needed actions.

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.	No requirements were included in previous Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Comment: GREIFF had no requirement to work off from its previous Brand Performance Check.

Evaluation

Possible Points: 2

Earned Points: 2

Recommendations to Fair Wear

GREIFF recommends Fair Wear to share information on how audits, trainings and stakeholder consultation can well be done sourcing from production countries where Fair Wear is not active in.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	32	50
Monitoring and Remediation	28	35
Complaints Handling	9	9
Training and Capacity Building	7	13
Information Management	7	7
Transparency	5	6
Evaluation	2	2
Totals:	90	122

Benchmarking Score (earned points divided by possible points)

74

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

26-10-2020

Conducted by:

Stefanie Santila Krause

Interviews with:

Nicole Wagner, Corporate Social Responsibility