



Brand Performance Check

Jack Wolfskin

This report covers the evaluation period 01-01-2020 to 31-12-2020

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.

This years' report covers the response of our members and the impact on their supply chain due to the Covid-19 pandemic which started in 2020. The outbreak of the Covid-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

Brand Performance Check Overview

Jack Wolfskin

Evaluation Period: 01-01-2020 to 31-12-2020

Member company information	
Headquarters:	Idstein/Ts , Germany
Member since:	2010-06-30
Product types:	Outdoor products;Sports & activewear;Bags;Accessories;Outdoorwear;Footwear; Luggage & other travel accessories
Production in countries where Fair Wear is active:	Bangladesh, Cambodia, China, Indonesia, Myanmar, Turkey, Viet Nam
Production in other countries:	Germany, Italy, 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	96%
Benchmarking score	74
Category	Good

Summary:

Jack Wolfskin has met most of Fair Wear's performance requirements. The benchmarking score of 74 means that Fair Wear has awarded Jack Wolfskin the 'Good status'. Although the monitoring threshold does not determine the category this year, the brand has fulfilled the monitoring requirements at suppliers responsible for 96 % of its production volume.

Corona Addendum:

COVID-19 has had a great impact on Jack Wolfskin's operations. Many of its own and 3rd party retail around Europe was closed for multiple months and at the head quarters many departments were affected with short working times. Starting 2020, Jack Wolfskin had two persons that were working on improvement of labour standards at suppliers. One person left and was not replaced so far.

From the start of the pandemic, Jack Wolfskin monitored all suppliers and was in regular contact with them by mail and phone. Moreover, the brand regularly exchanged information with other Fair Wear members, made use of FW guidance and consulted its local teams in China and Viet Nam. Generally, Jack Wolfskin has a strong system in place for doing human rights due diligence and it is aware of the risks prevailing in its production countries. For the COVID-19 related risks, the brands' efforts were focused on its most important production partners where the brand could make the biggest difference for the supplier and workers by its behaviour. The main risks that the brand identified were: consequences of factory lockdowns for workers' income and labour rights, risk of workers getting infected with COVID-19 during work and, production delays due to lower capacity because of COVID-19 measures.

To remediate those risks, the brand was in constant dialogue with its suppliers. When factories faced capacity issues and there were production delays, the brand adapted its planning and accepted all late deliveries without penalising its suppliers. When factories reported that they had a COVID-19 case in the factory, the Head of Vendor Control actively followed up to learn what support there was set up for the worker and how the general safety measures were in the factory. In 2020, there was one audit finding in Cambodia related to payment below legal minimum wages of security guards and two findings related to payment below legal minimum wages in Bangladesh. Jack Wolfskin has been able to remediate the cases in Bangladesh but the case in Cambodia was not resolved.

In addition, In several production countries of Jack Wolfskin, by local law factories were allowed to pay workers below legal minimum wage during lockdown periods. Jack Wolfskin was aware of this issue and has discussed it with several other Fair Wear brands. The brand has prioritised the relationship with the suppliers to avoid bankruptcy of suppliers and thereby indirectly the continuation of payment to the workers. At the same time Jack Wolfskin did not emphasise the importance of payment of 100% of LMW, as mentioned in the Fair Wear guidance on loss of jobs and wages, in its discussion with suppliers.

Jack Wolfskin has cancelled 10 % of the third delivery drop from the winter collection which was already ordered at suppliers. Moreover, the brand decided not to order the fourth delivery drop. To ensure none of the suppliers would be greatly impacted by the cancellations, the brand took a systematic way to inform all suppliers and later discussed the situation case by case with the suppliers. In case raw materials had been ordered already, Jack Wolfskin covered the costs and stocking of the material and used it for the following season. All cancelations were recorded in an overview to ensure all factories would receive fair payment and so that no information would get lost.

To sum up, Jack Wolfskin's robust monitoring system and long-term relationships with suppliers have proved to support the company in coping with a crisis such as the Corona pandemic. The crisis has shown that priorities shifted to keeping the business healthy and constantly having to adapt to a new situation. Therefore, activities such as that of increasing wages levels in the factories have shown less progress. Fair Wear recommends Jack Wolfskin to ensure it remains to have enough capacity in CSR to monitor working conditions and work on projects such as increasing wages.

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.	60%	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: In 2020, 60 % of Jack Wolfskin's production volume came from production locations where it accounts for at least 10 % of the production capacity. This figure is slightly lower than last year when it was 68 %. As a consequence of COVID-19, Jack Wolfskin noticed that suppliers took on more customers in order to spread the risk, which explains the difference in this figure.

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.	31%	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.	0	4	0

Comment: In 2020, 31 % of Jack Wolfskin production volume came from production locations where it bought less than 2% of its total FOB. While that is still a considerable portion of the total production volume, the brand did consolidate its supply chain with 4 % compared to last year. Consolidation took place mainly at suppliers that produced footwear.

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.	56%	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 values long-term relationships with suppliers. This does not only apply to its tier one suppliers, the brand also works directly with nominated material suppliers. Moreover, the brand does not start cooperations with new suppliers for the short-term. In some cases, Jack Wolfskin might opt to integrate new suppliers if technical specifications of a product require it or it places orders with new production locations operated by suppliers with an existing business relationship.

In 2020, the brand bought 56 % of its production volume from suppliers where a business relationship has existed for at least five years.

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: In 2020, Jack Wolfskin added 10 new production locations to its supply chain. All locations have signed and returned the questionnaire with the Fair Wear Code of Labour Practises (CoLP).

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. In 2020, A pre-audit at a potential new supplier in China detected a case of child labour. Jack Wolfskin decided not to start cooperation with the supplier but it took responsibility for the case and ensured it was remediated as soon as possible. The brand collaborated with a local organisation to ensure that the child is now going to school and it continues to monitor the situation. The remediation process will take two years and the related costs and monitoring are arranged for by Jack Wolfskin

Jack Wolfskin conducts a yearly risk assessment for all its production countries, the information in the risk assessment is based on relevant country information, Fair Wear guidance documents, and followed webinars. The risk assessment is linked to the evaluation of suppliers by means of a supplier evaluation form (see 1.5). Jack Wolfskin's strategy is to maintain a stable supply chain. The brand's sourcing strategy includes a due diligence procedure. Subcontractors are integrated into the brand's monitoring activities but not yet integrated into FairForce.

To keep itself informed on the impact of COVID-19 on its sourcing countries and production locations, Jack Wolfskin was in regular contact with all suppliers by mail and phone. Moreover, the brand regularly exchanged information with other Fair Wear members, made use of Fair Wear guidance and consulted its local teams in China and Viet Nam. Generally, Jack Wolfskin has a strong system in place for doing human rights due diligence and it is aware of the risks prevailing in its production countries. For the COVID-19 related risks, the brands' efforts were focused on its most important production partners where the brand could make the biggest difference for the supplier and workers by its behaviour. The main risk identified by the brand were: the consequences of factory lockdowns for workers' income and labour rights, risk of workers getting infected with COVID-19 during work and, production delays due to lower capacity because of COVID-19 measures.

Many of the brands' planned audits could not take place because of COVID-19, which made it more difficult for the brand to assess and monitor the working conditions at the factories. To remain up-to-date on the working conditions, the brand intensified its contact with suppliers and started a pilot with hybrid audits (combination online/offline).

Recommendation: The COVID-19 risk assessment should include country specific information regarding the lockdown and supplier specific information regarding its financial impact. This risk assessment should serve as the basis for dialogue between the member and supplier.

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. 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 Fair Wear's approach of continuous improvement. This means that it highlights that intransparency as well as unwillingness to remediate can also lead to discontinuation of a relationship in severe cases.

The results of the supplier evaluation are shared with suppliers. Suppliers with a low score on the human rights due diligence standard of Jack Wolfskin are monitored more intensively and are supported to achieve progress.

The evaluation is also 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.

Throughout the pandemic, the brand was in regular dialogue with all suppliers and it adapted its purchasing practises when needed to support suppliers. For instance, when many suppliers faced production and delivery delays, Jack Wolfskin adapted its production planning and accepted all late deliveries without penalising factories. When there were cases of COVID-19 in the factories, the Head of Vendor Control proactively followed up to learn what support was given to the workers and what safety measures the factory had in place to prevent further spread of the virus.

Jack Wolfskin has cancelled 10 % of the third delivery drop from the winter collection which was already ordered at suppliers. Moreover, the brand decided not to order the fourth delivery drop. To ensure none of the suppliers would be greatly impacted by the cancellations, the brand took a systematic way to inform all suppliers and later discussed the situation case by case with the suppliers. In case raw materials had been ordered already, Jack Wolfskin covered the costs and stocking of the material and used it for the following season. In addition, the brand paid the cancelled orders for which the production already took place. All cancelations were recorded in an overview to ensure all factories would receive fair payment and so that no information would get lost.

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 that supports reasonable working hours at the production locations.

Suppliers receive first information about planned orders around nine 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. Additionally, Jack Wolfskin places pre-orders for carry over styles to alleviate pressure during peak production times. The brand has local staff in China and Viet Nam for quality control and production development to improve production flows.

In 2020, a considerate amount of time and efforts has been made to regularly adapt the production planning in response to the Corona pandemic. When production was delayed because of country and/or factory lockdowns, Jack Wolfskin accepted all later deliveries without penalising its factories. Moreover, the brand started to book capacity and raw materials even more in advance and worked closely with the sales department to forecast its purchase orders.

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

Comment: Jack Wolfskin is continuously building on the relationships with its suppliers to make sure that they report issues on time and overtime hours can be prevented. Preventive measures include in advance capacity and raw material planning and having discussions with suppliers on root causes of excessive overtime. Also, it is discussed with the factories that production planning should be based on eight hours per day without over time. Progress is monitored in annual audits.

In 2020, there were three audits that included findings related to excessive overtime. During the brand performance check, the brand could show it had followed up on all findings. COVID-19 made it more difficult to verify whether improvements have actually been implemented.

In the first case, the factory did not accurately register all working hours and, overtime hours were recorded separately from the standard working hours. The factory has sent evidence that the issue has been solved. Final verification by means of an audit is difficult because of the impact of COVID-19 and the current political development in the country (Myanmar).

The other case concerned a factory located in Viet Nam that is monitored closely to remediate on a repeated non-compliance finding on excessive overtime. The matter has been discussed multiple times with the factory and factory management has stated that overtime has been reduced, verification of that will take place during the next audit.

The last case involved a factory in Bangladesh where excessive overtime hours were registered. Moreover, work on national holidays was not correctly compensated. In CAP follow up, the factory has stated the issues have been solved and wage record information has been sent as proof. The brand is planning to verify the findings with an audit and is also planning to organise a Workplace Education Programme (WEP) training at this factory when the situation allows.

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 Cut Make Trim (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. For 2020, the brand had planned to further deepen its understanding of the link between its buying prices and wage levels in the factory by working together with another Fair Wear brand. However, because of COVID-19 these plans were put on hold.

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 authorised to make product engineering decisions, which means adjusting designs based on supplier feedback to ensure certain price limits are not exceeded.

In 2020 the brand received four audits that contained findings related to the brands' prices being too low to support payment of living wage. The brand has used these findings to ask for more transparency from the suppliers and to ask for more detailed information of their production costs.

Jack Wolfskin is well aware of the additional costs made by suppliers because of COVID-19, especially at its main suppliers. The additional costs were partly absorbed by Jack Wolfskin through open discussions on pricing while the brand could not always increase its retail prices of the products.

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. The newly developed app tool of Fair Wear called 'Fair Price' could support Jack Wolfskin with that.

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	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.	-2	0	-2

Comment: In 2020, Jack Wolfskin received several audit findings related to payment below legal minimum wage.

At one factory in Cambodia, an audit concluded that security guards were paid below Legal Minimum Wage (LMW). Jack Wolfskin did follow up on the matter but received no confirmation of the factory that the issue had been solved. An external audit was commissioned for this factory as well. Although this audit did not confirm the same finding; it also did not contain information on the wages of security guards in the factory. Hence this audit can't verify whether the issue has been solved.

Another finding related to payment below living wage came from a factory in Bangladesh, where a small part of the workers were paid as apprentice. Jack Wolfskin showed active follow up with the factory and factory management has stated all workers now receive at least legal minimum wage. The case is considered as closed; however the brand has not fully closed the case until it can verify the matter by means of an onsite audit.

At another factory in Bangladesh, it was found out that workers were not provided with general holiday during lockdowns, rather, these days were taken as casual and annual paid leave. In discussion with factory management it was found out that this arrangement was done in agreement with the workers as otherwise workers would not receive full payment of the wages.

In several production countries of Jack Wolfskin, by local law factories were allowed to pay workers below legal minimum wage during lockdown periods. Jack Wolfskin was aware of this issue and has discussed it with several other Fair Wear brands. The brand has prioritised the relationship with the suppliers to avoid bankruptcy of suppliers and thereby indirectly the continuation of payment to the workers. At the same time Jack Wolfskin did not emphasise the importance of payment of 100% of LMW, as mentioned in the Fair Wear guidance on loss of jobs and wages, in its discussion with suppliers.

Requirement: If a supplier fails to pay minimum wages, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected or additional verification by Fair Wear may be needed to verify remediation.

The Fair Wear guidance on loss of jobs and wages expects member brands to have a human right based approach and requires proactive brand efforts for payment of 100% legal minimum wage in the situation where payment below the regular legal minimum wage is allowed for by local law. This also applies in cases such as payment with apprentices and wage reduction below legal minimum wage during lock down periods.

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.

From the start of the pandemic until the end of the year, Jack Wolfskin has extended its payment terms at several suppliers from 45 to 90 days. The extension was discussed with suppliers in an open and systematic way. First, the brand sent out an official letter to all suppliers explaining the situation. Next, the brand entered in dialogue with the suppliers by means of calls and emails to learn if it was possible for the supplier to extend the payment-terms to 90 days.

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.	Insufficient	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	0	6	0

Comment: In the previous financial year, the company has conducted an in-depth analysis of current wage levels, mapped the results against living wage benchmarks and defined a target wage for its factories in Vietnam and Bangladesh. Suppliers have been informed about the outcome of the analysis and the defined target wage (see 1.13).

Due to COVID-19, Jack Wolfskin has not continued to analyse the wage levels in the factories over 2020 or discussed the topic of living wage with suppliers.

Requirement: Jack Wolfskin 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. Jack Wolfskin 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.

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	6	0

Comment: In 2019, Jack Wolfskin had defined target wages for two key sourcing countries, Bangladesh and Vietnam. In both cases, the target wage was defined as 170% of the legal minimum wage. Jack Wolfskin has decided on this target without consulting its suppliers, but has analysed stakeholder benchmarks. Several suppliers met the target wage set by Jack Wolfskin in 2019.

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.

As explained under indicator 1.8, Jack Wolfskin cannot yet fully demonstrate the link between its buying price and wage levels.

Due to the impact of COVID-19, Jack Wolfskin has not implemented a new target wage in 2020. The company also did not put effort in further developing its strategy to finance wage increases.

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.

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 Jack Wolfskin 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: In 2019, a target wage was paid for 26% of production volume. As the information for 2020 was not updated, there was no information available about wage levels and relation to target wage in 2020.

Purchasing Practices

Possible Points: 52

Earned Points: 26

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	95%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0.5%	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	
Total monitoring threshold:	96%	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: Jack Wolfskin's Head of Vendor Control is responsible for following up on problems identified by its monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Yes	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.	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: 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: 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. The brand would like to increase its engagement with worker representation but also faces challenges when it comes to language.

Recommendation: In the countries where Jack Wolfskin has local staff, the brand is recommended to investigate if local staff can support the brand's engagement with worker representation. That way, allowing the brand to include workers representation in following up on audit reports.

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: Jack Wolfskin conducts annual audits at most production locations and monitors the follow up in a systematic manner. High urgency issues are prioritised and progress on corrective action plans (CAPs) is monitored by means of a traffic light system. Depending on the issue, follow up may include asking suppliers for status updates including collecting evidence of improvements, monitoring visits by staff or the monitoring partner Sumations. Jack Wolfskin's supplier rating and internal monitoring system include automatic reminders of unresolved corrective actions. So far, worker representation is not systematically involved in the follow up of CAPs.

Because of COVID-19, not all planned audits for 2020 could take place and it was not always possible to make visits to verify improvements. To monitoring working conditions at the factories, the brand had more regular calls and email exchange with most suppliers. In addition, in Viet Nam, China and Cambodia factories were visited by local staff of the brand. During those visits, local staff checked whether the factory had taken the correct COVID-19 measures.

For the brand performance check a sample of CAPs has been reviewed. Jack Wolfskin could show steady progress on most of the CAPs and evidence was always requested before solving an issue. More complex issues related to working hours, no discrimination and Freedom of Association (FoA) were at time still in progress or open. In some cases, CAPs were not fully resolved until they can be verified during a visit or, so that it can be monitored over a longer period. From the sample of CAPs, there was one factory that has not responded to the status of CAPs since the Corona pandemic has started. To monitor the situation at that supplier, the brand recently requested access to an external audit commissioned by another brand.

Recommendation: Fair Wear recommends Jack Wolfskin to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings. For example, the brand could start in the production countries where it already has local staff to overcome the language barrier.

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.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

Comment: As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2020 for all Fair Wear members.

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: Jack Wolfskin mainly works with Fair Wear audits and audits from its own monitoring partner. However, as audits were not possible in many cases during 2020, the brand has also collected several external audits for (new) suppliers. The Head of Vendor Control assesses the quality of the report based on experience.

In 2020, the Head of Vendor Control noticed an increased risk for labour violations at a potential new supplier based on an external audit report. Consequently it was decided to conduct a Fair Wear audit. As a result of that it was found out that there was a child labour case at the factory. While Jack Wolfskin decided not to start cooperation with this factory it actively involved in remediation of the case (see more information 1.4).

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.	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	Advanced			6	6	-2

Comment: Bangladesh:

All of Jack Wolfskin's production location in Bangladesh have been audited by either the Accord or Alliance. Remediation status is currently over 90%. All suppliers also received training by Fair Wear on fire and building safety. Despite Fair Wear's requirement for all members to become member of the Bangladesh Accord, Jack Wolfskin has decided not to do so as it is of the opinion that building safety should be safeguarded by factories themselves.

To follow up on the requirement of last year, that asked Jack Wolfskin to assess whether the programme established by its main Bangladesh supplier had resulted in a functional system to promote gender quality and prevent gender based violence, the brand has set up several meetings with the supplier and its facilities. From the conversations. the brand learned that each of the facilities now has a female worker counsellor on site for the workers. In addition, regular meetings take place between the counsellors and management of the factory. Jack Wolfskin welcomes the initiative of the supplier to create a functional system for these issues that is adapted to its own business.

Myanmar:

Jack Wolfskin has implemented the monitoring requirements established by Fair Wear for production in Myanmar. Jack Wolfskin places particular emphasis on Freedom of Association (FoA) and is trying to stimulate constructive collaboration between their suppliers and unions. Two locations are currently following 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 followed this practice and actively remediated the case. In 2020 it was confirmed that the supplier no longer has this practice and all workers receive at least legal minimum wage.

Turkey:

Jack Wolfskin sources less than 2% of its total production from two production locations in Turkey. The suppliers are informed by about possible labour rights violations linked to employing Syrian refugees. Both factories have been audited in 2020 (one external audit and one Fair Wear audit), neither detected the employment of Syrian refugees.

FoA is another high risk in Turkey. In 2020, Jack Wolfskin has supported in the remediation of a complaint related to FoA that it had received two years ago for a shared supplier with a Fair Labour Association (FLA) member. To remediate the case, a series of training was given at the factory and new elections were hold, both activities were observed by FLA.

Other risks

Jack Wolfskin is well-aware of the other risks related to its production countries and has regular discussions with suppliers about those risks. For example, in Cambodia the brand has defined women health and gender discrimination as high risks. In conversations with suppliers the brand discusses how the factories ensure healthy and safe working conditions for workers and ensures there is no discrimination against pregnant women. For China, excessive overtime, non-payment of social insurances, wage calculation models are seen as high risks.

COVID-19:

As mentioned at indicator 1.4, Jack Wolfskin kept itself informed on the impact of COVID-19 in its sourcing countries by having monitoring its suppliers and having regular contact with all suppliers, exchange with other Fair Wear members and consulting FW guidance and that of other relevant initiatives. As main risks, the brand identified for all its sourcing countries: the consequences of factory lockdowns for workers' income and labour rights, risk of workers getting infected with COVID-19 during work and, production delays due to lower capacity because of COVID-19 measures in the factory.

To remediate those risks, the brand was in constant dialogue with its suppliers. When factories faced capacity issues and there were production delays, the brand accepted all late deliveries without penalising its suppliers. When factories reported that there was a COVID-19 case in the factory, the Head of Vendor Control actively followed up to learn what support there was set up for the worker and how the general safety measures were in the factory. Using the FW COVID-19 Factory Health and Safety Discussion sheet, Jack Wolfskin made its own questionnaire that served as a basis for these conversations.

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 its monitoring partner with other Fair Wear members and has participated in Fair Wear audits at production locations shared with other Fair Wear member brands. In collaborating with other brands on CAP follow up, Jack Wolfskin usually does not define a brand that is in the lead. Rather, the efforts are shared among brands and information and learnings from the different brands are exchanged on a regular basis.

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.: Yes (1)

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.

Recommendation: From next years' brand performance check, Italy will no longer be considered as a low risk country and regular monitoring requirements will apply.

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: Jack Wolfskin has monitored 96% 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	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.	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	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.	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	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: 26

Earned Points: 25

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	4	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	4	
Number of worker complaints resolved since last check.	4	

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 Head of Vendor Control is designated to follow-up on worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	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: Jack Wolfskin has set up a systematic process to provide the Fair Wear Worker Information Sheet (WIS) to suppliers. In normal circumstances, its monitoring partner as well as staff visiting suppliers would check if the CoLP has been posted.

In 2020, the brand conducted less audits and, visits to suppliers were not possible for obvious reasons. In the countries where the brand has local staff, China, Viet Nam and Cambodia some factories were visited and during the visit the posting of the WIS was verified.

There were two audits in 2020 that contained findings related to the WIS not being posted or up-to-date. In one case, the factory openly shared its difficulties with having the WIS posted in the factory because of the Fair Wear CoLP related payment of living wage. A meeting was set up with the other members sourcing at this factory and Fair Wear. Through the discussions, a joint solution was found to add an explanatory note about this CoLP next to the WIS in the factory. In the other case, the WIS posted in the factory was not up-to-date. The brand proactively followed up with the factory and ensured the updated WIS including logo of the brand was posted in the factory.

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.	21%	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.	4	6	0

Comment: Due to the spread of the COVID-19, there were little possibilities to conduct trainings in 2020. In total, five production locations of Jack Wolfskin completed Fair Wear's Workplace Education Programme Basic module in the past three financial years and one factory participated in a Better Work training on OHS. In addition, the Fair Wear worker rights videos were shared at two production locations in Turkey. In total, this accounts for 21 % of Jack Wolfskin's production volume.

In addition to organising trainings, Jack Wolfskin recommends to its factories to hand out the Worker Information Sheets or Cards at least once per year together with pay slips to all workers so that they have the complaints number at home and might feel more comfortable to read it and make use of it.

Recommendation: The spread of COVID-19 continues to be a high risk in many production countries and physical trainings are in many cases not possible. Therefore, members are invited to share the FW COVID-19 videos that were made available for Indonesia and Turkey with their suppliers. In addition, members are recommended to search for alternative tools that can be used to raise awareness in the factories about worker rights.

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 seven 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 proactive follow up on all complaints received, not only in solving the complaints but also in investigating the root causes. For example, after the brand had received multiple complaints for one production site it took several steps to understand the culture and working conditions at the site. As a result of that, the brand found out that middle-management could benefit from receiving behavioural trainings and that top management should focus more knowledge transfer to middle-management. As a next step, it has discussed these findings with top management of the factory and a WEP communication training was planned at this factory. As COVID-19 currently does not allow for physical trainings to take place at the production site, the brand would like to investigate with Fair Wear if the training could be given online.

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 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.	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.

Complaints Handling

Possible Points: 17

Earned Points: 15

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: Jack Wolfskin has made Fair Wear membership part of the introduction program for all new staff. The topic was also properly introduced to the new CEO. Staff working in Jack Wolfskin stores is trained twice a year. Their training includes two hours of information on Fair Wear. This year, the trainings were organised online due to COVID-19.

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: 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.

When international travel is allowed, staff visiting 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. In addition technicians and other departments involved in production are included in supplier evaluations.

Jack Wolfskin has local staff in Vietnam and China and they are trained on the Fair Wear requirements as well. In assessing the situation of COVID-19 in China and Vietnam, local staff in these countries have been of great support to monitor the situation.

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: Jack Wolfskin has one intermediary for three production locations in Indonesia that also acts an agent. The intermediary is well informed about Fair Wear's Code of Labour Practices. As Jack Wolfskin is also in direct contact with the factories, 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.	25%	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.	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. Due to COVID-19, most follow up trainings could not take place in 2020.

Seven production locations in Vietnam, Cambodia and Indonesia participated in the ILO Better Work programme, of which part are counted for this indicator.

Together all trainings account for 25% of Jack Wolfskin's production volume.

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 training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

Training and Capacity Building

Possible Points: 11

Earned Points: 9

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. 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 has made efforts to identify and monitor subcontractors further down the supply chain together with its tier one suppliers through a programme of the Sustainable Apparel Coalition (SAC). So far, these subcontractors are not registered in FairForce as they change too frequently.

In normal circumstances, Jack Wolfskin visits (almost) all production locations annually, including subcontractors. Due to COVID-19 this has not been possible in most countries apart from the countries where the company has local staff.

Through a Fair Wear audit, it was discovered that one of the brands' suppliers had not posted the Fair Wear WIS at one of its subcontractors. The brand has proactively followed up on the matter, asked the factory to ensure the WIS was posted and verified if that was the case by means of picture proof.

Recommendation: Fair Wear recommends Jack Wolfskin to register all known subcontractors in FairForce so that possible complaints can be registered in the information system of Fair Wear and to deepen the understanding of the brands' supply chain set up.

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: Head of Vendor Control and other relevant staff that is in contact with supplier regularly share information about suppliers, their social performance and outcomes of audits. Moreover, the suppliers' overall performance including social is evaluated twice per year and this is also shared with all relevant staff including top management.

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: 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 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.	2	2	0

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

In addition, the brand has opted-in for the Fair Wear transparency policy and it has disclosed 100 % of its supply chain both to the members in FairForce and on the Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	1	2	-1

Comment: Jack Wolfskin has submitted a social report on its last financial year to Fair Wear. On its website, it has published the social report of the year before.

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: Head of Vendor Control 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 necessary steps are also discussed. Moreover, since Jack Wolfskin became part of Callaway Golf Company CSR and the Fair Wear membership is also discussed with relevant staff of the other brands that are part of the portfolio of Callaway.

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, 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.	4	4	-2

Comment: The last performance check included one requirement for indicator 2.7:

'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.'

Jack Wolfskin has implemented the requirement, for more information see indicator 2.7

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

Jack Wolfskin recommends Fair Wear to include brands and if applicable its management from an early stage when deciding on (new) strategic directions. In addition, Fair Wear is recommended to consider the challenges brands face in their engagement with worker representation and to create more guidance on that topic. Lastly, Jack Wolfskin advises Fair Wear to consider certification of its membership to adapt to the needs of the public.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	26	52
Monitoring and Remediation	25	26
Complaints Handling	15	17
Training and Capacity Building	9	11
Information Management	7	7
Transparency	5	6
Evaluation	6	6
Totals:	93	125

Benchmarking Score (earned points divided by possible points)

74

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

26-07-2021

Conducted by:

Annemiek Smits

Interviews with:

Melanie Kuntawitz, Head of Vendor Control

Imen Wong, Vice President of Product Development