

Brand Performance Check Ortovox Sportartikel GmbH

This report covers the evaluation period 01-07-2020 to 30-06-2021

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 <u>www.fairwear.org</u>. The online <u>Brand Performance Check Guide</u> provides more information about the indicators.

On COVID-19

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

Ortovox Sportartikel GmbH Evaluation Period: 01-07-2020 to 30-06-2021

| Member company information | |
|--|--|
| Headquarters: | Taufkirchen , Germany |
| Member since: | 2015-02-04 |
| Product types: | Outdoor products;Sports & activewear; Outdoorwear |
| Production in countries where Fair Wear is active: | China, Romania, Vietnam |
| Production in other countries: | Austria, Belarus, Germany, Hungary, Italy, Latvia, Lithuania, Poland, Serbia, Taiwan, 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 | 83% |
| Benchmarking score | 77 |
| Category | Leader |

Summary:

Ortovox has shown advanced results on performance indicators. The benchmarking score of 77 means that Fair Wear has again awarded Ortovox the 'Leader' status. Although the monitoring threshold does not determine the category this year, Ortovox has fulfilled the monitoring requirements at suppliers responsible for 83% of its production volume.

Corona Addendum:

At the beginning of COVID-19, there was uncertainty at Ortovox regarding planning security. In 2020/2021 no one from Ortovox was on furlough and no production facility was impacted heavily by lock-downs, infections or order reductions, making it possible for both Ortovox and its partners to continue business as usual. The member even achieved to continue to grow, as the outdoor branch experienced an upswing during COVID-19. Ortovox did not have to cancel or reduce any orders and remained a stable partner for its suppliers.

The biggest challenge was related to quality control, as colleagues could not travel as usual and if there were quality problems this was only discovered after products were delivered (or when the product was already far along in the production process).

Ortovox showed a systematic approach in its risk assessment related to the impact of COVID-19 on its suppliers. In cooperation with another Fair Wear brand, the member developed a risk-assessment tool, in which infection rates and thereby potential lock-downs in the different production countries were closely tracked. The tool also included information about available government support in case of lock-downs. While Ortovox managed to monitor COVID-19 related risks quite well, following up on open CAPs with factories or with brands having the lead in the CAP follow-up could have been more thorough.

Besides the risk-assessment tool, Ortovox was in regular exchange with its suppliers to receive information first-handed. Besides the regular exchange between the production department and the suppliers, the CSR team offered one-on-one calls to all suppliers in order to understand the impact of COVID-19 on its suppliers in depth. While not all suppliers accepted this invitation, Ortovox made sure to monitor all its suppliers via two supplier surveys. In those surveys, suppliers were requested to share information on order status, infection rates, OHS measures and the payment of wages. While Ortovox did not request evidence for the payment of wages, the continuous production throughout 2020/2021 and the information it received via the surveys and personal discussions, confirmed to the member that the payment of wages was not a risk.

The member has not explicitly discussed the impact of increased costs for suppliers related to COVID-19. At the same time, suppliers have not requested financial support from the member to cover these costs.

Due to COVID-19, the plan to proceed with the topic of living wages was slowed down. A scheduled audit could not take place which was needed for the collection of wage data.

Overall it can be said that Ortovox's response to the pandemic was strong thanks to its established systems and its cooperative approach. Ortovox showed how shared responsibility along the supply chain can look like in a global crisis. As shops were partially closed in Europe, Ortovox supported its retailers by shifting revenue from its online shops to those shops that were closed.

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. | 63% | 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 the year 2020/2021 Ortovox bought 63% of its production volume from production locations where the member buys at least 10% of production capacity. This is a slight increase compared to last year. The member has insights into its leverage by requesting data on a yearly basis from its suppliers and uses this data as well to plan the upcoming orders.

| 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. | 26% | 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 | ο |

Comment: Ortovox bought 26% of the production volume from production locations where it buys less than 2% of its total FOB. Compared to last year this number went slightly up. The reason behind this lies in both its continuous growth and its strategy to produce largely in Europe. Its supplier base in Europe cannot take on all the extra volume and therefore Ortovox is constantly seeking new suppliers that meet its high standards. Some suppliers do not accept production above 2% of FOB and some are only needed for special high tech steps of the production. While Ortovox understands the importance of a consolidated supply chain, these reasons make it difficult for Ortovox to shorten the 'tail end'.

| 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. | 58% | 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: Good relationship management lies at the core of Ortovox - the relationship to its employees as well as the relationship to its suppliers. Ortovox aims to continue to work with its long-term partners, even though many of them cannot keep up with the increase in order volume. The long-term partners in Europe outsource the extra volume to subcontractors and thereby Ortovox combines the requirements of its growth with its core value of long-term supplier relationship. Working with partners long-term is also needed, as the products of Ortovox are highly technical and not many suppliers exist that can meet those high standards. In the year 2020/2021 Ortovox worked with 58% of its suppliers for a minimum of 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 2020/2021, Ortovox started new business relationships with three suppliers in Romania, Bulgaria and Germany. The member had requested and received the Fair Wear questionnaire of the new suppliers before production took place.

| 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: The continuous growth of Ortovox means that new suppliers are constantly needed. While it is easier to increase production volume at its Asian suppliers, the comparably smaller size of its European partners requires additional production facilities. The additional facilities are subcontracted by Ortovox main partners and the quality department at Ortovox is responsible for the onboarding process.

Before starting a new business relationship, the facility is requested to fill out a comprehensive data sheet, which is crosschecked by the CSR department. Normally, potential facilities are visited beforehand, which was not possible during COVID-19. In order to conduct due diligence, Ortovox conducted personal conversations, requested previous audit reports and as usually preferred suppliers from other Fair Wear members. The member keeps an overview of its supplier base in a comprehensive excel sheet, which includes relevant Fair Wear data. The company is implementing a new Product Lifecycle Management (PLM) system that entails supplier information such as audit reports and pictures. More and more information gets included in the new system, yet until it is able to include all relevant data for proper due diligence, the CSR department continues to work with its previous excel system. In the future, the new system shall get linked to suppliers for an easier exchange of information.

As a member of the Partnership for Sustainable Textiles, Ortovox has developed a risk analysis to track developments within its sourcing countries. The highest risk that was identified in 2020/2021 was the potential shut-down of its European suppliers. Ortovox seeks constant exchange with other brands to foster more collaboration and decrease double work. This collaborative approach was also taken during COVID-19. In order to be informed about the infection rates in its sourcing countries and the linked risk of lock-downs, Ortovox cooperated with another Fair Wear brand to collect relevant data and shared this document with other brands. Eventually, its suppliers did not face major challenges and the production was running as usual. The increase of the outdoor brand during COVID-19 enabled one of its partners to grow by 80%. The outdoor boom and the manageable impact of COVID-19 in 2020/2021 reduced the risk of job and wage loss.

Not being able to travel and to visit the suppliers, was identified as another risk by Ortovox. The member knows how important it is to be on-site to get proper insights into the suppliers' performance and due diligence. In order to balance this risk, Ortovox reached out to all its suppliers to offer one-on-one calls. In total 19 suppliers accepted this offer. The calls helped Ortovox to get deeper insights and to discuss Fair Wear relevant topics. With one Chinese partner, the call was difficult due to language barriers. Additional to these calls, Ortovox conducted two supplier surveys to collect information on OHS measures, order status, COVID-19 cases and subcontractors.

Overall, the Fair Wear information was used less as on the one hand the majority of the members' production countries are non-Fair Wear countries and on the other hand once the information was shared by Fair Wear Ortovox already had implemented necessary measures.

| 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: The production department has the closest contact with the suppliers. Four people divide up the different suppliers and are the main contact for them from sample to packing. The team has regularly one-on-one call with the suppliers and are well informed about their situation. The compliance of suppliers with the Code of Labour Practises is monitored in a supplier evaluation sheet. Each supplier is ranked from one to ten in different labour standards.

Each season a meeting takes place in which different departments participate. In this meeting, the suppliers are discussed from production performance to CoLP compliance. Based on this the upcoming orders are discussed and decided.

The performance of one of its suppliers was not good and therefore Ortovox entered into dialogue to push for improvement. The supplier has shown willingness to improve and has already shown progress, for instance, the supplier hired someone who is just responsible for CSR compliance. Ortovox ends a business relationship only as a very last resort and is committed to continuing business with low performing suppliers when those are willing to improve. In 2020/2021 one supplier showed no willingness to work on CAP findings and Ortovox intended to phase out this supplier step-by-step. It reduced its orders slowly and communicated to the supplier that without improvements the business relationship will be ended. Before an exit strategy was fully implemented, the supplier informed Ortovox that it will stop production and close the factory. Ortovox reached out to the supplier to check if the workers had received their severance pay, which was confirmed by the supplier.

During COVID-19 Ortovox increased the personal exchange with its suppliers. Not all suppliers accepted the invitation to the one-on-one calls (see indicator 1.4), however the production department collected extra information via weekly and sometimes even daily contact with the suppliers. Moreover, two supplier surveys were sent to all suppliers and thereby Ortovox felt well informed about the impact of COVID-19 on its partners. None of the suppliers requested financial support and the cost of COVID-19 measurements were not included in the prices.

To support a supplier, a special collection, made out of leftover fabrics was initiated in summer 2021.

Recommendation: As an additional step on top of the supplier evaluation, Ortovox could consider giving suppliers the tools to conduct a self-evaluation. Furthermore, it could ask its suppliers to evaluate the purchasing practices of Ortovox.

| 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: Ortovox has an advanced forecasting system and discusses delivery deadlines in close collaboration with suppliers. The process starts already three years in advance when suppliers receive the first forecast. This first stage of the forecast system is used for capacity planning. This early forecast is especially important for European production, as here capacity issues are more severe than in Asia. The next steps in the forecast system are used for discussing exact numbers and for placing the official order. The production team keeps track of orders through a comprehensive excel sheet, which includes relevant production data such as the start of production, QC release and shipment. The sheet is as well shared with its suppliers, to ensure a smooth exchange of information.

The outdoor boom during COVID-19 increased the demand in production, therefore Ortovox places its order even earlier than pre-COVID-19.

The production planning always includes a buffer to compensate for delays in delivery. During COVID-19, those buffers were not always enough. To avoid excessive overtime, Ortovox accepted delays in deliveries or partial deliveries without financial penalties and when needed shared the costs for airfreight with the suppliers.

Ortovox develops some of the fabrics itself, hence late design changes or a sudden increase in order volume are not possible.

Recommendation: Fair Wear recommends Ortovox to learn more about the standard minutes per style and how the production of its products impacts the total production capacity of the factory. Therefore it encourages Ortovox to move forward with the open costing template it already had drafted.

| 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: In the financial year 2020/2021, no findings of excessive overtime were found at its European suppliers, from which Ortovox had purchased 56% of its production volume. The issue at its European suppliers is that working time is often not properly recorded. In order to remediate this issue, Ortovox is currently drafting a supplier workshop about internal monitoring.

Ortovox is aware of the risk of excessive overtime in its production countries China and Vietnam. The member states that when overtime does occur, the reasons are most likely not because of its orders. The solid production planning system (see indicator 1.6) is a mechanism that aims to prevent overtime from occurring. When audits indicate overtime, Ortovox reaches out to suppliers to double-check if the root causes are the result of its own business practice. In those conversations, suppliers reassured Ortovox that the root cause lies somewhere else.

After a Chinese supplier had shown a lack of cooperation to remediate audit findings, Ortovox decided to exit the supplier slowly (see Brand Performance Check Report 2020). To give the supplier the chance to find new customers, the exit was internally planned after a trade fair in 2021. Shortly before the member announced its exit plan to the supplier, the supplier informed the member that the factory will close in a few days.

In an audit conducted in October 2020 at one of its Vietnamese suppliers, excessive overtime was found. As the CAP lead lies with another brand, Ortovox was not sure about the development regarding this finding.

Recommendation: Ortovox could discuss with factory management the causes of excessive overtime and provide support to manage overtime. If necessary, Ortovox could hire local experts to analyse the root causes of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request.

Fair Wear recommends Ortovox to document the status of joint follow-up actions. Even though one brand commonly takes the lead it is important to be kept informed of the status in order to be aware of required implementation steps before communication with or visits to the factory.

| 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: In order to link its buying prices with the wage levels in production locations, Ortovox developed an open costing template that includes standard minute per style and labour minute costs. This sheet was already distributed to its suppliers and partially the suppliers have sent back their information. The collection of wage data came to a pause, as the supplier calculate wage information differently, making it impossible to compare the returned data. Ortovox joined the living wage lab of the Partnership of Sustainable Textiles. Thereby, the member collected relevant information on how to deal with wage data. In order to solve this properly, Ortovox currently seeks an expert that can support pushing this process further.

Requirement: The member should engage in a dialogue with the supplier about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into their prices.

Recommendation: Ortovox could provide suppliers who don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs. This might help to streamline data, needed for the collection of wage data.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------|---|---|-------|-----|-----|
| 1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid. | Yes | If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, 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. | 0 | 0 | -2 |

Comment: All the suppliers confirmed to Ortovox via the supplier surveys that legal minimum wages were paid throughout 2020/2021. During this time no lock-downs occurred and only some workers were affected by quarantine, so that production was running without big interruptions. Therefore, the impact on the payment of legal minimum wages was manageable during this specific timeframe.

While Ortovox requested information from all its suppliers if legal minimum wages were paid and also about their overall order status, it did not verify the responses by requesting wage slips from all its suppliers. In the financial year 2020/2021 the production in Asia was not heavily affected by COVID-19 and the suppliers (and workers) located within the European Union received support from the governments when needed. Ortovox stated that it is not possible to track the payment of wages from the government. Ortovox also stated that requesting wage slips, in general, is a very sensitive topic and that wage slips are often not shared by both European and Asian suppliers, even when anonymised.

During an audit in 2019, some issues were found linked to this indicator. Wages could not be verified due to inconsistent or incomplete data and allowances, bonuses, or benefits are not paid as legally required. Ortovox followed up with the supplier after the audit. The supplier was frustrated about the auditors and the statements of factory management and auditors were in conflict. To solve this issue, Ortovox initiated another audit with Sumations focusing on wages. Based on this follow-up audit working time is recorded by an electronic time recording system and time records were available for review for each worker with exact in- and out-time. As the setting of the electronic time writers does not record overtime after 6 pm, an extra list documents the overtime manually. The follow-up visit in October 2019 found that overtime is paid correctly with overtime premium as prescribed by the laws. Regarding allowances, the follow-up audit found that the attendance bonus of a 1-day salary and transportation allowance is paid additionally to the monthly basic wage. Free meals are provided for lunch and dinner when workers work more than 2 overtime hours per day. Childcare support is provided to workers who have children under 6 years. This childcare support is very low in comparison with the same allowance provided by the other companies. Also, yearly bonuses are paid 3 times a year.

Another audit of one of its Chinese suppliers revealed that not all workers received a legal minimum wage and recordings of work time are incomplete for temporary and home workers. This is the same supplier that informed Ortovox that the factory will close. Before, the member received this information it had planned a two-year exist scenario, as the supplier was not willing to improve and remediate CAP findings. After the factory ended the business relationship with Ortovox, the member asked if workers received the legal severance pay, the factory confirmed this but did not provide wage slips as evidence.

| 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: No late payments were identified by Fair Wear. In order to support its suppliers with liquidity issues, Ortovox paid when needed invoices directly/before the payment deadline.

| 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: In order to gain transparency about the current wage levels and what is needed to move towards living wages, Ortovox initiated a wage analysis at its Ukrainian supplier. Since 2020, Ortovox planned to kick off this analysis but was slowed down due to COVID-19. As a first step, an audit was scheduled to collect data on wages. Due to COVID-19, this audit was not conducted and therefore the initiative had to be postponed. The delay caused frustration on the side of Ortovox as the member had the goal to have proceeded further with this topic in 2020/2021.

With other suppliers, other issues need to be solved first before a wage analysis can be conducted. For instance, several suppliers do not record working time and therefore capacity-building about internal monitoring needs to be implemented first. Ortovox is planning to develop supplier training for internal monitoring, in order to build skills on side of its suppliers.

Recommendation: Once COVID-19 allows, Fair Wear encourages Ortovox to involve worker representatives and 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 | ο |

Comment: Ortovox has no own 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: Ortovox is working towards analysing the wage gap at one of its Ukrainian suppliers in order to know how much wages need to increase. The process was slowed down due to COVID-19 (see indicator 1.8).

Ortovox started internal discussions around this topic with top management and aims to develop a strategy to ensure all departments are aligned about how a wage increase can get financed.

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

| 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: Until now neither a living wage nor a target was implemented on behalf of Ortovox.

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Purchasing Practices

Possible Points: 52

Earned Points: 29

2. Monitoring and Remediation

| Basic measurements | Result | Comments |
|--|---|--|
| % of production volume where an audit took place. | 52% | |
| % of production volume where monitoring requirements for low-risk countries are fulfilled. | 31% | 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. | No (implementation will be assessed next performance check) | FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check. |
| Requirement(s) for next performance check | All factories must be visited b | y Ortovox staff at least once every 3 years. |
| Total monitoring threshold: | 83% | 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: Ortovox has a designated CSR team to follow up on findings 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 |

Comment: Ortovox makes use of Fair Wear audits and external audits only.



| 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: Ortovox shares the audit report and corrective action plan with its suppliers immediately. When possible the member meets the suppliers directly after the audit to collect their opinion and impression of the audit. Sometimes also virtual closing meetings are conducted, during which worker representatives are present. A direct conversation with worker representatives is not possible due to language barriers. The member feels that the worker representation is often just present for the protocol, but without real involvement. Together with the supplier, Ortovox prioritizes the CAP findings and sets-up timeframes.

Recommendation: Fair Wear recommends to include the audit monitoring process in its supplier workshop on internal monitoring. Thereby suppliers can develop a process that includes worker representatives more closely in the audit process for instance by defining a clear role and tasks for them. To strengthen the role of worker representation, a system can be developed that creates information flow from workers to worker representation.

| 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: To keep track of ongoing CAPs, Ortovox documents the status in an audit overview sheet. The different labour standards are evaluated from one to ten and highlighted in different colours. This helps to get a quick overview of the status of CAPs and the development of suppliers per labour standards. The table also helps to compare the performance of the different suppliers. High-risk findings are additionally inserted as a follow-up task in the task management tool of the CSR department.

One CAP follow-up of one of its Chinese suppliers was tough and work-intensive. Deadlines were constantly missed and Ortovox had to reach out repeatedly. The factory was missing a formalized process to deal with the complaints in the complaint boxes. In a previous audit, the finding was a missing complaint box, which the factory had installed and the management did not understand why a process is needed. To raise awareness about this topic and to remediate it, Ortovox had planned a Fair Wear training on communication, but this was not facilitated due to COVID-19. One of the root causes of this finding is a missing CSR monitoring system of its supplier. While Ortovox plans to organise an internal monitoring workshop for its European suppliers to address root causes of non-compliance, it considers to offer this workshop as well for Asian suppliers. Another solution to this issue is peer learning. Ortovox aims to promote more peer learning amongst its suppliers so not everyone had to tackle issues by themselves. As a first step, a supplier workshop will be hosted for its European suppliers.

The impact of COVID-19 for the specific timeframe 2020/2021 was manageable. Thanks to the COVID-19 specific risk analysis and its supplier surveys, Ortovox was well informed about the situation in its production countries and at its suppliers. None of the member's suppliers was closed and production was running. The boom in the outdoor branch diminished the risk for job and wage loss, as the majority of Ortovox's suppliers had more orders than usual. The COVID-19 risk analysis also included information about available government aid, which helped Ortovox to monitor the risk of wage and job loss during potential lock-downs and quarantine. To monitor the risk of wage loss further, Ortovox requested information on order status and the payment of legal minimum wages via its supplier surveys. None of the suppliers indicated any risk regarding the payment. Verifying the payment of wages is perceived as challenging by Ortovox and as well its suppliers, which often do not approve to share such sensitive data. When some workers of its European suppliers were in quarantine 80% of the wages was paid by the governments. According to Ortovox, the payment of the government was not possible to verify.

The supplier surveys also collected information on the implementation of OHS measures. And those measures were also discussed in the weekly calls between suppliers and production planning.

Recommendation: It is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements. Therefore, Fair Wear encourages Ortovox to go through with its supplier workshop on internal monitoring and to include the involvement of worker representation during audits in a systematic way.

Moreover, Fair Wear recommends Ortovox to only close issues when verification can be provided by showing proof (pictures, documentation) or by on-site visits of Ortovox, by including worker representation, or an independent third party.

| 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 2020/2021 for all Fair Wear members. Nevertheless, Ortovox was able to visit 16% of its production locations in 2020/2021. The quality managers of Ortovox in China and Eastern Europe were able to visit a few production sides.

| 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: Ortovox requested three existing audit reports from its suppliers. The reports were reviewed and relevant findings integrated in its monitoring. When working with a new supplier Ortovox prefers to initiate a new audit as the existing audits often are of poor quality.

Ortovox sources from a couple of countries, in which Fair Wear is not active. Therefore, the brand is dependent on external organisations. The brand collaborates with mainly one audit company, which matches its quality requirements.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--|--|--|-------|-----|-----|
| 2.7 Compliance with FWF risk policies. | Advanced result on all relevant policies | 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. | 6 | 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 | Advanced | | | 6 | 6 | -2 |

Comment: Ortovox does not have production in Bangladesh, Myanmar or Turkey and does not produce denim products. To monitor risks at subcontractors, Ortovox conducts full audits at subcontractors and also invited subcontractors to the one-one calls.

COVID-19 Risk identification and follow-up:

When it comes to COVID-19, OHS measures were already in place when the financial year 2020/2021 started. The continuation of the OHS measures was followed-up via the supplier questionnaires and in personal conversations. Additionally, the COVID-19 specific risk assessment supported Ortovox to be up to date about recent developments in its production countries and to monitor potential risks closely. Fortunately, during the timeframe 2020/2021, the impact of the pandemic was manageable. Ortovox did not investigate the added costs for suppliers for implementing COVID-19 protective measures and it did not factor these costs into its buying prices. However, the member asked its suppliers if support was needed. Support was given when needed in form of earlier payment and sharing the costs for air freight. The Fair Wear Worker Information videos were not shared with factories.

Vietnam and China:

To monitor the risk regarding forced labour in China, Ortovox first assessed the origin of its cotton with the help of the fabric department. Thereby, the member found out that its cotton comes from Turkey and India. Additionally, Ortovox participated in Global Works Project by Fair Wear to learn more about its tier 1 and tier 2 suppliers in China. The business licenses of those suppliers were uploaded by the member in the Fair Wear database.

Regarding the labour standard Freedom of Association and the risk of non-compliance in Vietnam, Ortovox has already taken some first steps. One of its Vietnamese suppliers already participated in the WEP on communication and another training was already requested for another supplier. Fair Wear expects Ortovox to follow up on those trainings in more detail to ensure that the next steps are taken by its suppliers. Moreover, Ortovox is encouraged to follow up on excessive overtime at its Chinese and Vietnamese suppliers more thoroughly.

Italy:

While Italy is considered a high-risk country due to migrant labour, it is not a risk at the Italian supplier of Ortovox. The supplier in Italy has lots of automated processes as it is producing socks. The supplier is certified with SA 8000 and based on the audit report no migrants are employed.

Gender:

Being aware of gender discrimination in the garment supply chain, Ortvox initiated a training on sexual violence at one of its Chinese suppliers in 2020.

| 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: Ortovox actively cooperates where possible with Fair Wear members to address issues related to labour conditions. Besides the joint risk assessment during COVID-19, Ortovox reached out to a brand sourcing at the same supplier to exchange ideas. In general, Ortovox hopes for more collaboration within this industry.

| 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: In the last three years, only one supplier in Lithuania has not been visited. Production only started in 2020, so this visit was not possible due to COVID-19. Also, a few audits were conducted in the last three years in Italy and Latvia.

Extra monitoring activities in low-risk countries include supplier surveys and one-on-one phone calls.

Recommendation: Ortovox is advised to conduct a mapping of its supply chain in Italy that includes: investigation of subcontractors, the ownership structure of production locations, the number of workers and the type of employment relationship (irregular and migrant employment) to identify and mitigate potential labour rights violations. Ortovox is encouraged to visit its production locations in Italy to discuss the risks associated with irregular and migrant employment relationships.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------|--|---|-------|-----|-----|
| 2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met). | No | 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. | N/A | 2 | 0 |

Comment: Ortovox has not audited all production locations where it produces more than 2% of FOB or is responsible for more than 10% of production.

| 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 |

Comment: No external brands resold (N/A).

| 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 |

Comment: No external brands resold (N/A).

27/42

| 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 |

Comment: No licensees (N/A).

Monitoring and Remediation

Possible Points: 26

Earned Points: 24

28/42

3. Complaints Handling

| Basic measurements | Result | Comments |
|---|--------|--|
| Number of worker complaints received since last check. | 1 | 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. | 1 | |

| 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 two heads of CSR are responsible for addressing 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: Worker information sheets are regularly checked during production location visits as well as in the annual data survey. In times of COVID-19, visits were not possible and suppliers provided Ortovox with pictures via email to show evidence of the posted worker information sheets with complaints hotline details.

One audit at the end of 2019 found that the Fair Wear Code of Labour Practices was not provided in the local language of one factory. Ortovox stated that they had requested the supplier regularly to do this, even the head of product was requested for support, but nothing made the supplier react. Eventually, the supplier informed Ortovox that it will close and therefore the relationship got ended.

| 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. | 8% | 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: Two WEP Basic trainings were implemented within the last three years. Those training initiatives account for 8% of FOB in high-risk production countries.

| 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: Ortovox received one complaint in 2020/2021 from a factory located in China. The complainant stated that materials were taken by the factory management to production sites from relatives. According to the complainant, this led to less work for the workers and thereby to lower wages. The factory management responded that these claims are not true and that a misunderstanding must have occurred. According to the management, some machinery had to be maintained and to compensate for this some orders were moved to another factory under the same group to ensure the production deadline. Global Services also analysed the wage slips and did not find evidence backing up the complainant statement. Global Services reached out to the complainant to request more information such as the wage slip, but the complainant denied further exchange of information. Eventually, the complaint was closed as no further evidence was handed in to move forward with the process.

Throughout the steps of the complaint mechanism, Ortovox was in regular exchange with the brand that had the lead in solving the complaint.

| 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: Ortovox was cooperating with other brands throughout the process.

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 | ο |

Comment: The entire staff of Ortovox is informed and regularly updated about Fair Wear related topics. After an audit, a small audit summary is drafted by the CSR department to inform other departments about recent developments at suppliers.

Additionally, once per year an internal training on sustainability is facilitated to raise awareness amongst the entire staff.

| 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: Regular jour fixes between the CSR with the quality departments take place, as the quality department is an important contact for the suppliers and therefore well informed about the situation.

Recommendation: Fair Wear encourages QC staff to observe factory audits conducted by the Fair Wear audit teams to learn about the audit process and to be able to better follow up on corrective action plans.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------------------------------|---|--|-------|-----|-----|
| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. | Yes + 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: Ortovox does not work with agents, but it cooperates with its main suppliers in Europe in sourcing decisions and CAP follow-ups. Ortovox would like to involve them more strategically in terms of monitoring.

Recommendation: Fair Wear encourages Ortovox to follow through with its idea to actively train its quality control team and its main European suppliers on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|---|---|-------|-----|-----|
| 4.4 Factory participation in training programmes that support transformative processes related to human rights. | 35% | 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: The WEP Communication training was conducted at two Vietnamese suppliers accounting for 35% of FOB from high-risk production countries.

| 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: After the WEP Communication module was implemented at two of its suppliers, Ortovox discussed the outcome with the factory management and requested their feedback.

Recommendation: Fair Wear recommends Ortovox to discuss outcomes of dialogue sessions with their supplier and what steps management is planning to further strengthen dialogue between workers and management. This may include holding an independent worker representative election; regular meetings between worker representatives and management to discuss improvements to working conditions or allowing worker representatives to conduct a worker survey on specific issues. Ortovox should also investigate how they can contribute to implementing the action plan workers and management have agreed on (e.g. by adjusting sourcing practices).

Training and Capacity Building

Possible Points: 13 Earned Points: 11

34/42

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: Ortovox is well aware of the locations that are used for its production. Once per year suppliers are requested to fill-out a comprehensive data sheets, which includes questions for subcontractors. The member includes in its supplier contracts a clause that requires transparency and disclosures from suppliers on subcontracting. According to this clause, no subcontracting is allowed without the approval of the member. Ortovox treats direct suppliers and subcontractors the same and initiates full audits at subcontractors.

Currently, the supplier contract is in revision to add incentives and penalties for upholding/breaching the clause on 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: All staff involved in production has access to relevant supplier information. More details in indicators 4.1 and 4.2

Information Management

Possible Points: 7

Earned Points: 7

36/42

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: All information of Ortovox regarding Fair Wear adheres to Fair Wear's communications policy. Ortovox communicates on its website about its membership. Ortovox also actively supports retailers and provides them with information material.

| 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: Ortovox publishes Brand Performance Check reports on its website and includes summaries of audit results in the annual Sustainability Report. To enhance its transparency efforts in terms of materials, Ortovox initiated a cooperation with the Hessnatur foundation, which consults the department responsible for materials.

Ortovox has disclosed 79% of its supply chain both to other Fair Wear members and on the Fair Wear website. Beyond that Ortovox aims to disclose its suppliers in the Open Apparel Registry and is just waiting for consent from its suppliers.

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

Comment: Ortovox submitted a complete and accurate social report. The report, known as Ortovox's Sustainability Report is published on the member's website.

Transparency

Possible Points: 6

Earned Points: 6

38/42

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: The CSR department is in regular contact with top management via jour fixes and meetings of the management board. The membership of Fair Wear is evaluated constantly. While Ortovox values its membership at Fair Wear and the open dialogue with Fair Wear staff, it stated that in the last few years other players entered the market such as the Partnership for Sustainable Textiles, which supports them quite well too.

| 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. | 50% | 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: In the past performance check, Ortovox received only the requirement to set a target wage to move forward with the living wage indicators. Before Ortovox can set a target wage, it wants to conduct a wage analysis to determine a reasonable target wage. Therefore an audit was scheduled, which could not be conducted due to COVID-19. Therefore, Fair Wear applies leniency regarding this indicator.

Evaluation

Possible Points: 6

Earned Points: 6



Recommendations to Fair Wear

* Ortovox appreciates the open dialogue with Fair Wear and the support received through the Brand Liaison. Furthermore, the division between the role of Brand Liaison and Performance Checker is welcomed.

* Ortovox would appreciate more, quicker and practical support from Fair Wear. The member feels that Fair Wear focuses too much on details and would prefer a more high-level approach.

* While Fair Wear has high expectations from its members, Ortovox feels that those expectations are sometimes unrealistic. * Ortovox appreciates the risk-based approach taken by Fair Wear. The implementation however is to short-noticed and

Ortovox hopes for more flexibility and realistic timeframes.

* The member feels that Fair Wear as a Multi-Stakeholder-Initiative is not considering enough the perspective of brands, but focuses mainly on NGOs. And the pressure from NGOs is forwarded to the brands. Ortovox stated that it is good to have high expectations and to push brands to meet those, but Fair Wear should support better with tools to meet those expectations.

* Marketing campaigns from Fair Wear should be communicated earlier and not so last minute, so it is easier for brands to participate.

* One of the biggest challenges is to convince suppliers to implement internal monitoring systems. Ortovox would appreciate it if Fair Wear can develop a guideline for that - a practical one that is easy to be implemented on the supplier level.

* Sometimes the audit reports of Fair Wear do not provide clear to do's for the supplier.

* For a member it can be confusing to navigate through all the information, updates and guides provided by Fair Wear. Ortovox hopes for a more structured information sharing approach. For instance, the newsletter only shows two highlights and thereby other not-highlighted information gets lost. The previous newsletter design was better.

* As Ortovox is producing in many non-Fair Wear countries, the grievance mechanism is only working with an e-mail. Thereby it is not anonymous and might prevent workers from sharing complaints. There are solutions already in place to share complaints anonymously via email. Ortovox would appreciate if Fair Wear changes this.

* Ortovox did not feel well guided during their first complaint. They missed a proper guideline, about what is expected. * More and more shops request information about how products are produced. As shops are crucial when it comes to consumer awareness, the brand would appreciate if Fair Wear provided to the members relevant material. For instance, a small clip that shows how QC, the shops, the brand the consumer etc. all play a crucial role when pushing for more sustainability. The clip could show the different roles and their importance.

* Also, a small clip about living wages would be helpful.

Scoring Overview

| Category | Earned | Possible |
|--------------------------------|--------|----------|
| Purchasing Practices | 29 | 52 |
| Monitoring and Remediation | 24 | 26 |
| Complaints Handling | 15 | 17 |
| Training and Capacity Building | 11 | 13 |
| Information Management | 7 | 7 |
| Transparency | 6 | 6 |
| Evaluation | 6 | 6 |
| Totals: | 98 | 127 |

Benchmarking Score (earned points divided by possible points)

77

| Performance Benchmarking Category | |
|-----------------------------------|--|
| Leader | |

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Brand Performance Check details

Date of Brand Performance Check:

15-11-2021

Conducted by:

Hannah Ringwald

Interviews with:

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