



**Brand Performance Check**  
**SANDQVIST Bags and Items AB**

This report covers the evaluation period 01-01-2021 to 31-12-2021

## 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 [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

*This year's 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 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

## SANDQVIST Bags and Items AB

Evaluation Period: 01-01-2021 to 31-12-2021

Member company information	
Headquarters:	Stockholm , Sweden
Member since:	2016-02-29
Product types:	Outdoor products;Bags;Accessories;Luggage & other travel accessories
Production in countries where Fair Wear is active:	China, India, Viet Nam
Production in other countries:	Italy, Sweden
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	89%
Benchmarking score	15
Category	Needs Improvement

## Summary:

SANDQVIST has shown insufficient progress on almost all performance indicators leading to a benchmark of 15 points. As a result, SANDQVIST is placed in the 'Needs Improvement' category. SANDQVIST has a monitoring threshold of 89%.

## Corona Addendum:

SANDQVIST is a company producing bags and backpacks, mainly for travel purposes. In 2020 the COVID-19 pandemic had a severe impact on the brand's business, but in 2021, SANDQVIST was able to stabilise the situation. The brand has a small number of suppliers and only sources in five countries. To be more resilient in the future, SANDQVIST decided to focus more on active bags and backpacks. As this requires different materials and production knowledge, SANDQVIST shifted a significant amount of production volume from its Indian supplier to its Vietnamese supplier.

SANDQVIST does not have a system in place describing all necessary steps for proper Human Rights Due Diligence for sourcing at new production locations. Since the CSR manager had left the brand and the position was not replaced, the member brand was not able to uphold the CSR-related tasks. Until August 2021, the product manager was responsible for implementing, monitoring, and remediation of Fair Wear's code of labour practices. From August 2021 on, the brand hired a consultant to support the product manager with these tasks. However, due to the product manager's workload and the consultant's limited hours, very little work was done in 2021. In addition, Sandqvist does not have a process in place to systematically follow up on CAP issues. In 2021 this led to a delay of nine to twelve months to follow up on CAP issues.

Two suppliers in India and Vietnam were in lockdown between May and October 2021. Still, only in December 2021 SANDQVIST reacted to this issue by sending out a COVID-19 questionnaire to learn more about the order situation at the suppliers, layoffs, working hours, wages, and health and safety of the workers.

As a result, SANDQVIST has shown insufficient progress on almost all performance indicators. For the two indicators, 1.9 and 2.7, SANDQVIST received an insufficient score in the previous Brand Performance Check. In this year's Brand Performance Check, SANDQVIST again received an insufficient score on these indicators which means that the brand is automatically placed in the 'Needs Improvement' category.

Fair Wear requires SANDQVIST to ensure enough capacity to monitor, remediate and mitigate potential risks at its suppliers as soon as possible. This includes a thorough risk assessment of all production countries and (potentially new) suppliers and linking the assessed risks to its suppliers. After prioritising the risks, SANDQVIST should set up a work plan on how to start the remediation and mitigation process in cooperation with its suppliers and the worker representatives. Fair Wear strongly recommends beginning work on the Responsible Business Conduct Policy.

## 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.	10%	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.	1	4	0

**Comment:** In 2021, SANDQVIST bought 10% of its production from production locations where it buys at least 10% of production capacity. As SANDQVIST shifted a significant amount of its production volume to a supplier in Viet Nam, where the member brand has low leverage, and had a decline of its annual turnover, this number decreased by 7% compared to the previous year.

**Recommendation:** Fair Wear recommends SANDQVIST to take leverage into consideration when moving its production to Vietnamese production locations. SANDQVIST should consider the risk of human rights violations at suppliers, the influence it has to bring change, and the impact it can have at a factory level.

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.	0%	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.	4	4	0

**Comment:** SANDQVIST maintains a consolidated supplier base. In 2021, the brand onboarded four new suppliers for the brands' accessories collection and started first production with low volumes. In total, 0,5% of SANDQVIST's production volume comes from production locations, the brand buys less than 2% of its total FOB.



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.	10%	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.	1	4	0

**Comment:** SANDQVIST does have a long-lasting relationship with one supplier in India. This relationship exists since 2009. In 2019, this supplier built a new production site. In 2020, the supplier had to close down one production site due to loss of orders and loss of workforce capacity as a result of the COVID-19 pandemic. The workers and management were shifted to the new production site. As the management and most of the workers remained the same, Fair Wear does count this new production site to the percentage of production volume where business relationship has existed for at least five years.

**Recommendation:** Fair Wear recommends SANDQVIST to maintain stable business relationships with suppliers. Long-term relationships support most aspects of the Code of Labour Practices and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long-term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff.

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.	No	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.	0	2	0

**Comment:** As already mentioned in indicator 1.1b, SANDQVIST has added four new suppliers from China, Italy, Sweden, and Viet Nam to its supplier base. The Fair Wear Code of Labour Practices (CoLP) questionnaire was completed and signed by the supplier in Italy. The supplier in Sweden did not want to sign Fair Wear's CoLP questionnaire. Both supplier and brand feel that due to the strict European and Swedish regulations, workers are well-protected, which makes the Fair Wear CoLP questionnaire redundant. The suppliers in China and Viet Nam have completed the questionnaire, yet, the signature was missing.

In the CoLP questionnaire, the Vietnamese and Italian suppliers informed the brand about the use of subcontracting partners. The brand did not send out the Fair Wear CoLP questionnaire to the subcontracting partners.

One supplier indicated in the questionnaire the use of two production locations, but the brand did not investigate in which of the two production sites its articles are produced.

**Requirement:** SANDQVIST needs to ensure that new production locations sign and return the CoLP questionnaire before first orders are placed, regardless it is a main supplier or subcontracting partner.

**Recommendation:** Fair Wear recommends SANDQVIST to follow up on the information provided in the Fair Wear Code of Labour questionnaire.

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.	Insufficient	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.	0	4	0

**Comment:** SANDQVIST has a small number of suppliers and only sources in five countries. In 2021, the member added new production countries and new suppliers to its supplier base. SANDQVIST does not have a system in place describing all necessary steps for proper Human Rights Due Diligence for sourcing at new production locations. Since the CSR manager has left the brand and the position was not replaced, the member brand was not able to uphold the CSR-related tasks. Until August 2021, the product manager was responsible for the implementation, monitoring, and remediation of Fair Wear's code of labour practices. From August 2021 on, a consultant was hired to support the product manager with these tasks. However, due to the workload of the product manager and the limited hours of the consultant, only very little work was done in 2021.

In 2021, the member brand assessed possible risks related to sourcing in Italy and its new supplier. The CSR - consultant informed herself via Fair Wear country studies and followed up on risks such as complex and diffuse owner structures, (Chinese) migrant workers, and subcontracting partners. Yet, the brand did not conduct any risk assessment related to its new sourcing partners in China and Vietnam, or Sweden.

In 2021, a significant share of the member brand's production volume was shifted from its supplier in India to one of its suppliers in Viet Nam. Although this supplier takes up 85% of the member brands' annual turnover, no risk assessment was conducted.

After a long onboarding process, the member brand started placing its first orders at its new Chinese supplier. The former CSR manager had conducted a risk assessment, but this has not been updated by the brand before placing the first orders in 2021.

Due to COVID-19 and the travel restrictions, the brand was not able to visit its suppliers. The CEO and product manager stayed in contact with the suppliers by e-mail or digital meetings. However, no systematic monitoring and remediation took place throughout the year. The brand was not able to support its suppliers with additional orders or financially due to the severe impact of COVID-19 on the brand's business,

Two suppliers in India and Viet Nam were in lockdown between May and October 2021. For the lockdown period, the Vietnamese main supplier used 3-on-site, meaning that workers worked and lived in the factory. Only in December 2021, the brand followed up on this issue by sending out a COVID-19 questionnaire to its main suppliers to assess the effects of COVID-19 on workers' wages and health only in December 2021. The results of the questionnaire will be evaluated in 2022. For SANDQVIST, the main risk as a result of the COVID-19 pandemic were wages and lack of capacity. The brand did not identify layoffs as a potential risk.

**Requirement:** A formal process should exist to evaluate the risks of labour violations in the production areas SANDQVIST is operating. This evaluation should influence the decision on whether to start sourcing in a new country, at a new supplier, to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

Fair Wear requests SANDQVIST to ensure enough staff and time capacity for its main due diligence processes. This includes that as long as there is no CSR manager, all staff in contact with suppliers is sufficiently trained and informed.

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	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.	1	2	0

**Comment:** SANDQVIST has implemented a supplier evaluation and rating system where the suppliers are monitored on various parameters covering the size of orders, competence, quality, delivery, prices, reliability, communication, and working conditions. Clear action points are developed and the feedback is shared with suppliers. The brand is not able to reward suppliers with additional orders as the orders are defined by sales figures and each supplier works on specific and different styles. The brand uses the results of the evaluation system to engage and support suppliers with low scores to encourage them to address issues. If no change is seen in the long-term the brand works on a phase-out strategy, as a last resort. The evaluation is normally done two times a year, after every season, in discussion with the CEO, buying, design, production, logistics teams. However, for 2021, this evaluation was done only once in December 2021, and the outcome was not shared with the suppliers and has not led to production decisions.

In 2021, one supplier in Viet Nam terminated its cooperation with SANDQVIST. In addition, SANDQVIST decided to stop cooperation with three other suppliers in Viet Nam, where the brand only had small leverages (0,4% - 5,7%). The suppliers were informed about this decision via the brand's agent. SANDQVIST does not have an exit strategy in place and did not assess how its decision influenced the worker's wages and job security.

As SANDQVIST is now producing more active bags, the brand had to shift a significant amount of its production volume from its supplier in India, who produced leather bags to a supplier in Viet Nam. Compared to 2020, the turnover with its Indian supplier dropped by almost 55%. This production shift was discussed with the supplier already a long time before the actual shift took place. Due to a lack of travel possibilities the supplier had difficulties finding new customers. However, no layoffs were needed to cover the loss and the factory was able to pay the wages to its workers.

Throughout the year, the brand stayed in contact with its suppliers, mainly via emails and digital meetings. The meetings took place about every third month. The effect of the COVID-19 pandemic was a frequent topic in the meetings. SANDQVIST informed itself about the COVID-19 preventive health and safety measures of its suppliers. But no photos or videos for verification were requested or shared by the suppliers. For Viet Nam, the member brand informed itself about the working and living conditions of the workers who had to stay in the factory during the two and a half month lockdown of the factory (3-onsite). Besides one audit at its Indian supplier, the brand did not undertake additional monitoring efforts to cover the lack of possible visits. In 2021, the brand did not cancel any orders.

**Requirement:** Fair Wear requests not to terminate a business relationship without first having discussed scenarios and solutions with your supplier. If exit is unavoidable, SANDQVIST should ensure that workers are protected and paid and follow Fair Wear's responsible exit strategy

SANDQVIST should frequently communicate with its suppliers about the impact of the COVID-19 crisis.

SANDQVIST should check whether other clients have canceled orders and what kind of support suppliers need.

**Recommendation:** Fair Wear encourages SANDQVIST to implement a responsible exit strategy and make sure all relevant staff is informed about this. Please see <https://members.fairwear.org/resources/responsible-exit-strategy/5>.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** SANDQVIST has a structured production planning system in place. The company is aware of each supplier's production capacity which is provided by the supplier. For the new suppliers, the brand did not cross-check the information given as the brand feels that its small orders have not any influence on the capacity of the new suppliers. The brand places four orders per supplier throughout the year and the lead time for SANDQVIST's orders is generally six months (starting from production order until shipment to Sweden). Suppliers reports on a weekly basis about the status of the orders.

In 2021, the lack of capacities in India and Viet Nam was the main reason for production delays. The main Vietnamese supplier was in lockdown for two and a half months and did have trouble finding workers after the restart. The lockdown itself and the lack of workers has led to significant production delays, which were accepted by SANDQVIST. Generally, suppliers do not have to pay penalties in case delivery times are not met. To support the suppliers, SANDQVIST decided to skip the order forecast phase and directly place orders, without the final sales confirmation of its retailers. This way the lead-time increased from six months to seven until eight months, which also supports the suppliers to order materials at an earlier stage.

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

**Comment:** An audit conducted at an Indian supplier in February 2021 showed inconsistencies in time recording, which could indicate overtime. The brand only shared the audit report and CAP nine months later.

In 2021, the brand's main supplier in Viet Nam went in lockdown for two and a half months. A group of workers stayed onsite. As no normal production was possible, these workers produced samples. According to SANDQVIST's investigation, overtime happened but on a voluntary basis.

In December 2021, the brand sent out a questionnaire to inform itself about possible overtime. As the supplier's feedback was received only in 2022, the evaluation of the questionnaire will be assessed in the next Brand Performance Check.

Generally, the brand is aware that overtime happens at its production sites but feels that its small orders do not heavily contribute to excessive overtime.

**Requirement:** With a high risk of excessive overtime in its supply chain due to the COVID-19 pandemic, the member needs to monitor suppliers more actively on excessive overtime. SANDQVIST should have collected information on whether its orders led to excessive overtime.

**Recommendation:** Fair Wear recommends for further guidance on excessive overtime its Fair Working Hours Guide, which is available on the member hub.

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.	Insufficient	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.	0	4	0

**Comment:** When developing new styles, the brand shares its target prices with its suppliers. In case a target price is not feasible, the brand will not negotiate the price but will discuss with the suppliers which changes are needed to come to the target price. All suppliers are required to share the cost breakdowns per article. In these cost breakdowns, the suppliers have to indicate the labour costs per article. The buyers at SANDQVIST do not know how many minutes are needed to produce an article nor are they informed about the labour costs per article.

Price increases due to an increase in labour costs are also accepted. However, the member brand neither informs itself about legal minimum wage increases in its sourcing countries nor does it verify if accepted price increases do lead to an increase in wages. SANDQVIST does not know if the payment from its suppliers to subcontractors covers the legal minimum wage. For its agent in Viet Nam, the member does not investigate if the prices set by the agent cover legal minimum wages.

Overall, the brand does know the labour costs but does not investigate how its buying prices are linked to the wage levels at its suppliers, nor does the brand verify if its prices support payment of at least legal minimum wages. For wage verification, the brand only relies on audit reports.

SANDQVIST does not know the costs for suppliers to implement COVID-19 preventive measures.

**Requirement:** SANDQVIST needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

In addition, Fair Wear requires SANDQVIST to assess, know and ensure, that its prices can at least cover the legal minimum wages.

**Recommendation:** Fair Wear recommends Sandqvist to use the information on labour minutes and exact labour costs and actively link this to their own buying prices.

Fair Wear highly recommends SANDQVIST to actively approach one or more suppliers to work with the available tools of the living wage toolkit by using for example the Fair Price app.

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:** Two suppliers in India and Viet Nam were in lockdown between mid-May and October 2021, but SANDQVIST only reacted in December 2021 by sending out a COVID-19 questionnaire gaining information about payment of at least legal minimum wages.

For India, the brand followed up on the information given in the audit report of November 2020 of one supplier, where payment of legal minimum wages was confirmed. Except for the audit report and the COVID-19 questionnaire of December 2021, the brand did not further investigate about payment of legal minimum wage in 2021. The second supplier India went on lockdown from mid-May 2021 until mid-June 2021. Although not obliged by the government, the supplier supported its workers by paying 70% of the wages during the lockdown. The annual leave was not paid out as agreed with the worker representatives. The factory did not receive government support to cover its loss for the lockdown phase. Workers received coupons for basic food from the government. Overall, the workers earned 30% less than the legal minimum wage during the lockdown. SANDQVIST was not able to support its supplier and the workers with additional orders or financially.

The Vietnamese main supplier was in lockdown for two and half months (mid-July until the end of September 2022). Most workers decided to suspend their working contracts to be eligible for governmental subsidies. A minority of workers stayed working in the factory according to the 3 onsite policy. For the first 14 days, the factory paid at least legal minimum wages. For August and September, the workers could apply for the governmental subsidy. In case workers applied for the governmental subsidy, they received a lost job subsidy and payments out of the unemployment insurance fund. According to the supplier, the subsidies in total exceeded the legal minimum wage. SANDQVIST did not verify the information given by the supplier, as the brand only relies on audits, which have not taken place yet. Also, the brand did not follow up if all workers were able to request governmental support and how long it took until the workers received their money. Since the amount of subsidies decrease the longer the factory remained closed, there is a risk that in September workers received less than the legal minimum wage. SANDQVIST did not follow up on the payment of wages to these workers.

**Requirement:** Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

If a supplier fails to pay minimum wages, members are expected to respond in time, identify root causes with factory management, and resolve the issue. Evidence of remediation must be collected. Factory visits with a documents check or additional verification by Fair Wear may be needed to verify remediation.

**Recommendation:** In case of a crisis such as COVID-19, Fair Wear strongly recommends SANDQVIST to stay in close contact with its suppliers and inform and investigate on time about the worker's wages and health situation.

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:** The member has made payments for invoices submitted within agreed timelines.



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 2021 SANDQVIST did not assess and respond to root causes for wages that are lower than living wages at its production locations.

**Requirement:** SANDQVIST must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. SANDQVIST is requested 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.

**Recommendation:** Fair Wear recommends the Living Wage tool kit provided on the member hub.

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.	None	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:** SANDQVIST has not decided on a specific living wage benchmark and has not defined a target wage to increase wages at the suppliers.

**Requirement:** SANDQVIST 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:** SANDQVIST did not pay its share of target wages, as no target wages were agreed upon in 2021.

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

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 7**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	89%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	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	When onboarding new suppliers, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the Fair Wear health and safety checklist must be completed and filed for Fair Wear to assess during a Brand Performance Check. SANDQVIST can collect existing audit reports from the production sites in order to ensure the most up-to-date information on working conditions.	
Total monitoring threshold:	89%	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.	No	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:** When the CSR manager of SANDQVIST left in 2020, the brand decided not to re-hire a CSR manager as the brand was heavily hit by the COVID-19 pandemic, leading to layoffs of staff members. Also in 2021, no CSR manager was hired, but in August 2021, SANDQVIST hired a CSR consultant with limited hours to support the brand. Until the CSR consultant started working for SANDQVIST the product manager was responsible to follow up on problems identified in the monitoring system. Due to the workload of the product manager and the limited hours of the consultant, the brand could not show sufficient follow-up on all Fair Wear labour standards throughout the year.

**Requirement:** Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

SANDQVIST should designate a person with sufficient capacity and resources to follow up on problems identified by the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies’ own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No	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.	-1	2	-1

**Comment:** SANDQVIST only shared the results of a Fair Wear audit from February in December with the supplier. SANDQVIST did not involve worker representatives in the CAP follow-up.

**Requirement:** SANDQVIST Bags is required to share and discuss the audit report and CAP findings with the factory within two months. A reasonable time frame should be specified for resolving findings. In case worker representation is applicable, the CAP should be shared with worker representatives as well as involved in setting the time frame for realizing improvements.

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.	Insufficient	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.	-2	8	-2

**Comment:** Sandqvist does not have a process in place to systematically follow up on CAP issues. In 2021 this led to a delay of nine to twelve months to follow up on CAP issues. SANDQVIST does not include worker representatives in CAP follow-up.

In December 2021, SANDQVIST started remediation on audit findings of the audit of February 2021 at its Indian supplier. The audit revealed issues, among others, with inconsistencies regarding working hours, wages, and occupational health and safety. The brand could show proof of first CAP follow-up and received proof of evidence about improvements done so far. The main concern for the brand is the unclarity of whether overtime happens at this production site. The investigation of this finding will be done in 2022.

In addition, in December 2021 SANDQVIST also started remediation on audit findings of the verification audit of December 2020 at its main Vietnamese supplier. This audit revealed mainly health and safety findings and some minor issues related to freedom of association and working hours. The CAP follow-up will be assessed in 2022.

COVID-19:

Although the Vietnamese supplier went on lockdown from mid-July until October, SANDQVIST only reacted to this information in December 2021 by sending out a COVID-19 questionnaire. Via the questionnaire, the brand informed itself about the living conditions of the workers, who stayed on-site and the payment of legal minimum wages for the workers, who suspended their contracts. Throughout the year, the brand informed itself about the health and safety measures at its suppliers to prevent COVID-19 infections.

**Requirement:** Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

Resolving and remediating non-compliances is one of the most important criteria member companies can do towards improving working conditions. Fair Wear expects SANDQVIST to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

**Recommendation:** Fair Wear recommends installing a systematic monitoring system for CAP follow-up. This includes root cause analysis, a prevention and mitigation program for the assessed risks, as well as cooperation with worker representatives on CAP findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	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 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No	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.	0	3	0

**Comment:** SANDQVIST did collect one external audit of its Italian supplier. The brand did not assess the quality and did no CAP follow up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average insufficient result on 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.	-2	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	Insufficient			-2	6	-2

**Comment:** In 2021, SANDQVIST has not paid attention to specific country risks of its sourcing countries China, India, Sweden, and Viet Nam. Only for Italy, the member brand informed itself about specific country risks such as (Chinese) migrant workers, complex and diffuse owner structures, and subcontracting partners.



#### COVID-19:

Throughout the year, SANDQVIST stayed in contact with its suppliers. Preventive health and safety measures were discussed, but not verified. SANDQVIST does not know the costs for suppliers to implement COVID-19 preventive measures. Except from Fair Wear worker videos, which have been shared with workers at one of its Indian suppliers, no additional COVID-19 guidance was shared with the suppliers. Only in December 2021, SANDQVIST has sent out a COVID-19 questionnaire to its three main suppliers in India and Viet Nam to learn more about the order situation of the suppliers, possible layoffs, working hours, wages, and the health and safety of the workers. In this questionnaire, SANDQVIST applied the gender lens by inquiring more information about the situation of female workers. The outcome of this questionnaire will be assessed in 2022. SANDQVIST did not cancel any orders and reacted to order delays by accepting late deliveries and adapting its purchasing procedure. Due to the severe impact of COVID-19 on the brand's business, SANDQVIST was not able to support its suppliers with additional orders or financially.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

SANDQVIST's monitoring system should identify and address high-risk issues that are specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies. The member must verify what OHS measures its suppliers took in response to COVID-19.

Fair Wear requires the member to ensure that it allocates necessary resources to continue working on addressing supply chain risks.

**Recommendation:** Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. SANDQVIST could agree on additional commitments that are required to mitigate risks.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No 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.	-1	2	-1

**Comment:** SANDQVIST's main supplier in Viet Nam is a shared supplier with four other Fair Wear members. In 2021, no cooperation with these four member brands took place to work commonly on remediation and mitigation of any findings at this supplier.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	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.	1	2	0

**Member undertakes additional activities to monitor suppliers.:** No (0)

**Comment:** In 2021, SANDQVIST started sourcing in Sweden, which is a low-risk country. The new Swedish supplier did not sign the Fair Wear CoLP questionnaire nor was the Worker Information Sheet posted in the factory. The supplier was not visited.

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

**Recommendation:** Fair Wear encourages SANDQVIST to audit production locations in the tail end as well to mitigate potential social compliance risks, especially when onboarding new suppliers.

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: -7**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	5	

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:** While there is no CSR manager in place, the product manager is responsible to address workers' complaints. Yet, the brand has not defined a follow-up in case the product manager is unavailable.

**Recommendation:** SANDQVIST should ensure that enough capacity is available to follow up on workers' complaints. The responsible person and substitute should be sufficiently trained on complaints handling.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	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:** In 2021, no systematic follow up was done to ensure that factory management and workers are informed about the Fair Wear Code of Labour Practices. Two new suppliers in Sweden and Viet Nam did not (yet) post the Worker Information Sheet. Worker Information Sheets posted at the Indian and Chinese suppliers were not up to date. SANDQVIST did not ensure that the Worker Information Sheets are posted at subcontracting partners.

**Requirement:** Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

SANDQVIST must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories, in a location that is accessible to all workers. SANDQVIST should check whether the Worker Information Sheet is posted in the factories and is up to date.

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.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** Because of COVID-19 restrictions in 2021 that limited the possibility to conduct trainings, this indicator is considered not applicable in this check.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

**Comment:** In 2021, five complaints of 2019 and 2020 about an Indian production site, were closed. Throughout the Brand Performance Check, SANDQVIST could not show any information and follow-up with regards to the completion of the complaints at its Indian supplier. No root-cause analysis was conducted, and no preventive measures were installed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

## Complaints Handling

**Possible Points: 3**

**Earned Points: -1**

## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** SANDQVIST holds monthly meetings with the entire team where important topics pertaining to Fair Wear membership are discussed, such as performance check results, factory training, etc.

That apart, every new employee, including those in the stores, receives a 30 minutes orientation on the company's sustainability approach and initiatives which includes Fair Wear membership.

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:** The product manager is in direct contact with all suppliers. In 2021, the product manager had regular meetings with the CSR consultant on various Fair Wear topics. Some of these meetings were joined by the CEO.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	1	2	0

**Comment:** SANDQVIST works with one agent in Viet Nam. The agent is involved when it comes to monitoring and CAP follow-up. However, in 2021, the brand did not update its agent on Fair Wear-related topics, such as Fair Wear's COVID-19 dossier. Also, SANDQVIST does not investigate if the price negotiations done by the agent cover legal minimum wages.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility to conduct trainings, this indicator is not applicable in 2021.

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



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## **Training and Capacity Building**

**Possible Points: 5**

**Earned Points: 4**

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## 5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** SANDQVIST's suppliers have to sign the supplier agreement, which does not allow subcontracting without prior approval of SANDQVIST. In Viet Nam, the agent's local team checks several times a month the production and therefore the risk of outsourcing is very small. While visits were not possible in 2021, the brand did have to rely on its quality control to detect any inconsistencies in its articles, especially coming from India, which could indicate the use of subcontracting. The brand did not specifically ask its suppliers about the use of (unknown) subcontracting partners in 2021.

Two new suppliers mentioned the use of subcontractors in Fair Wear's CoLP questionnaire. SANDQVIST followed up on this information only for one supplier.

SANDQVIST did not add its printing and embroidery subcontracting suppliers to Fair Wear's database. These suppliers did not sign the Fair Wear CoLP questionnaire and are not monitored by the brand, nor were the workers informed about Fair Wear's complaint hotline.

**Recommendation:** In case (new) suppliers are indicating the use of subcontracting partners (for example in Fair Wear's CoLP questionnaire), Fair Wear strongly recommends SANDQVIST to follow up on this information and include these suppliers in its monitoring procedure. Subcontracting partners are obliged to sign the Fair Wear CoLP questionnaire, and have to inform the workers about Fair Wear's complaints hotline.

After the end of each financial year, SANDQVIST must confirm its list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production.

Fair Wear recommends SANDQVIST to train its suppliers about monitoring subcontracting partners.

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:** Information pertaining to working conditions at production locations is shared with relevant staff in the meetings by the production manager and the CSR consultant, in coordination with the CEO.

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## Information Management

**Possible Points: 7**

**Earned Points: 4**

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## 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	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:** The brand communicates about FWF membership through different channels like Instagram, Facebook, in stores, press releases, etc. The head of marketing provides all relevant information, including the correct communication about Fair Wear to the brand's stores and retailers in Europe and around the world. The Wholesale director is in charge to check upon compliance with Fair Wear's communication policy.

SANDQVIST does not participate in campaigns like Fair Friday or Fashion Revolution.

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:** The brand has disclosed 100% of factories to other Fair Wear members in the internal Fair Wear system and on the Fair Wear website. The four new production sites in Italy, Sweden, China, and Viet Nam counting for 0,5% of SANDQVIST's FOB are not yet disclosed.

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.	For new member companies	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.	N/A	2	-1

**Comment:** The Brand Performance Check took place before the deadline of the social report.

## Transparency

**Possible Points: 4**

**Earned Points: 4**

## 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 CEO keeps herself informed of developments and issues through meetings and discussions. Fair Wear's membership has been evaluated, the brand's workplan and results of the last Brand Performance Check have been discussed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	5%	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.	2	4	-2

**Comment:** In the previous Brand Performance Check, SANDQVIST was given eight requirements pertaining to human rights due diligence, payment of legal minimum wages, living wages, CAP follow up and compliance with Fair Wear risk policies, raising awareness of Fair Wear Code of Labour Practices, trainings and follow up on trainings. The requirements related to living wages are not applicable due to the impact of COVID-19 on the business. The requirements given for trainings and follow-up are also not applicable this year. For the remaining indicators, the brand made partially progress on one indicator. For three requirements the brand could not show any follow-up in 2021.

**Requirement:** It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

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## Evaluation

**Possible Points: 6**

**Earned Points: 4**

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## Recommendations to Fair Wear

SANDQVIST did not have any recommendations for Fair Wear.

The brand hopes, that Fair Wear will support the new CSR manager, once this position is re-installed.



## Scoring Overview

Category	Earned	Possible
Purchasing Practices	7	52
Monitoring and Remediation	-7	26
Complaints Handling	-1	3
Training and Capacity Building	4	5
Information Management	4	7
Transparency	4	4
Evaluation	4	6
Totals:	15	103

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

15

### Performance Benchmarking Category

Needs Improvement

## Brand Performance Check details

Date of Brand Performance Check:

08-03-2022

Conducted by:

Annet Baldus

Interviews with:

Caroline Lind = CEO

Emma Guttormsen = Product manager

Karin Iseman = Consultant

Anna Emas = Accounting Manager

Tora Grape = Head of Marketing & Brand Communication