



Brand Performance Check

Blutsgeschwister GmbH

Publication date: June 2022

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. 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

Blutgeschwister GmbH

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

Member company information	
Headquarters:	Berlin , Germany
Member since:	2013-06-01
Product types:	garments, clothing, fashion apparel, bags
Production in countries where Fair Wear is active:	China, India
Production in other countries:	Lithuania, Portugal
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	100%
Benchmarking score	97
Category	Leader

Summary:

Blutsgeschwister has shown advanced results on performance indicators and has made exceptional progress. With a benchmarking score of 97, Blutsgeschwister is again placed in the Leader category. Although the monitoring threshold does not determine the category this year, Blutsgeschwister has fulfilled the monitoring requirements at suppliers responsible for 100% of its production volume.

This performance check was a self-assessment verified by Fair Wear as part of a pilot.

Corona Addendum:

2021 was another challenging year for Blutsgeschwister, with stores being closed for the first two months and trading partners being cautious with their orders. During the lockdown, Blutsgeschwister kept all temporary workers and student assistants in the company and paid the corresponding compensation payments entirely at its own expense - there was no state support for temporary workers. This enabled the company to build loyalty. In the second half of the year, the member benefited from growing demand and the easing of COVID-19 restrictions. Since June, all colleagues in headquarters and stores have been fully employed.

Blutsgeschwister did not experience many production delays in Asia. Where it did happen, it could easily opt for air-freight. Most production delays occurred in Lithuania and Portugal, and Blutsgeschwister accepted later delivery dates.

As in the first year of the pandemic, the member had a continuous dialogue with its suppliers regarding pandemic-related risks. If there was any doubt about the payment of wages, the member requested wage documentation that it sent to Fair Wear for verification. One Indian supplier had to close its doors in lockdown, and Blutsgeschwister asked if workers continued to receive their wages and organised an audit to verify this. The member visited its production locations in Portugal and Lithuania and organised three Fair Wear audits.

In 2021, Blutsgeschwister continued its efforts on living wages. It has a solid strategy to cost for target wages based on the Global Living Wage Coalition benchmark. It could demonstrate that eight suppliers covering 86% of Blutsgeschwister's total production volume pay out the set target wage.

Blutsgeschwister established that product developers need to request supply chain details from each supplier for every collection, providing detailed information from tier one to four. The member could show details of material and trim origins for three suppliers.

Generally, Blutsgeschwister shows the positive impact of robust and integrated monitoring systems. Even in times of pandemic, it has again made substantial progress on living wages and increased transparency.

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.	72%	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: Blutsgeschwister sources its items from 19 factories. 72% of Blutsgeschwister's production volume is sourced from locations where it buys at least 10% of production capacity.

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.	7%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	3	4	0

Comment: 7% of its production volume comes from production locations where Blutsgeschwister buys less than 2% of its total FOB. These are mainly for embellishments which are vital for the company's styles. Blutsgeschwister acknowledges it has a lot of advantages to have higher leverage at suppliers. Still, these embellishments are essential to the product and cannot be done at the factories where leverage is higher.

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.	75%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: 75% of Blutsgeschwister's FOB is sourced at production locations where a business relationship has existed for at least five years. The member has a fixed supplier base, but a change of subcontractors for embellishments is often needed due to the product type.

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 2021, Blutsgeschwister added one new Lithuanian production site to its supplier list and uploaded the signed questionnaire to Fair Wear's system. It is part of the member's routine to send new production locations the questionnaire with the Code of Labour Practices before placing the first bulk orders.

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: Blutsgeschwister has a robust due diligence process that requires production locations to share the results from previous audits and certifications as part of their onboarding process. Before starting to work with the factory, Blutsgeschwister requests audit reports and photos of the factory and discusses their approach to human rights due diligence with the factory. Potential new suppliers are visited, also by the CSR manager, who has the final say in whether or not a supplier is added to the supplier base. Due diligence has increasingly become a part of the design and product development in the last years. For example, if a particular design requires an extra supplier/subcontractor, it can be reconsidered and changed so that a new supplier is not necessary.

Blutsgeschwister only places orders after receiving a completed questionnaire and agreement to the Code of Labour Practice. The Fair Wear labour standards, including complex topics like open costing and transparency, are included in the contracts with suppliers and are part of the supplier manual. There is a written sourcing policy that includes this approach to due diligence. A standard email is sent to potential new suppliers explaining the processes mentioned above to ensure the production location fully understands what is required of them.

In 2021 Blutsgeschwister added a new Lithuanian supplier. An important consideration in selecting this factory was that it already produces for other Fair Wear members. The factory is already paying a living wage and used to open costing. The onboarding started already in 2020 and took almost a year. The member visited the location prior to production, after the lockdown period ended in 2021. The new production site several times and followed all due diligence procedures before starting the first bulk production. The supplier agreed to share open costing with Blutsgeschwister.

Usually, supplier visits are an essential part of the company's due diligence processes. Due to COVID-19, Blutsgeschwister could not visit its suppliers outside of Europe in 2021. The brand was able to organise Fair Wear audits for three of its suppliers. The brand continued its close dialogue with suppliers about potential risks caused by the pandemic and was very aware of the local developments, health and safety measures and payment of wages. The brand could show frequent communication with its Indian suppliers regarding the lockdown. Shortly after the lockdown, Blutsgeschwister planned a Fair Wear audit to verify that workers were paid during the factory closure. The other Indian supplier could stay open but had difficulty attracting new workers.

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: Blutsgeschwister's supplier evaluation criteria are general performance, quality, delivery, product development, cost and CSR. All standards weigh between 10 to 25%. Depending on the overall outcome of the criteria, the production site is rated red, yellow or green. The supplier evaluation is conducted twice a year. Since 2019, suppliers have been informed about their rating compared to other suppliers (other suppliers are anonymised in the overview). The CSR rating in the system includes the performance of the Fair Wear Code of Labour Practices. Since Blutsgeschwister works with a pre-order system, it is hard to reward suppliers with more orders. The supplier evaluation informs Blutsgeschwister's decision-making about where to decrease its orders.

Blutsgeschwister has ended collaboration with one supplier in China because of limited progress on CAP issues and quality problems. Since the start of the relationship, the member has supported the supplier in overcoming these issues. The evaluation card that Blutsgeschwister creates for each supplier shows low scores on quality and even lower on CSR. When its agent informed the member that no more progress was to be expected, the member did not place another order. However, it was not aware by that time the leverage was 11% and considered how to phase out gradually.

Recommendation: Fair Wear encourages BlutsGeschwister to implement a responsible exit strategy and make sure all relevant staff is informed about this. Its leverage at a supplier should be known before it decides to discontinue a relationship. Please see Fair Wear’s guidelines on a responsible exit strategy. As it is not always possible to reward suppliers with more volumes, BlutsGeschwister could look into other incentives that reward suppliers’ commitment towards the CoLP. An example would be to offer training for skill building/capacity development, or placing more NOS styles.

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: BlutsGeschwister has a solid and lengthy production planning system. The product development period is approximately 18 months, including many repeated orders, styles, and fabrics. Leadtimes are at least 90 days. To ensure efficient production planning, BlutsGeschwister has an agreed contact person for each production location, and suppliers communicate in case of unexpected delays and costs. BlutsGeschwister works with three agents who use the same factories each year. The company and agents know the capacity of each production location. Together they decide for 80/90% of the production well in advance which items are produced at what production site. This enables the company to plan the final production dates with the production sites effectively.

In 2021 the member continued to have a more extended sales period for its collections. As experienced the year before, this allowed more room for the suppliers to deliver the goods and produce the next collections. Furthermore, BlutsGeschwister continued simplifying orders by asking for more orders of the same style in more different colours.

The member did not experience a lot of material delay because the production for the next season only started in September, and by then, the fabrics were ready. BlutsGeschwister asked its Chinese suppliers if the electricity cuts impacted their production planning, but the impact was negligible. It only had a small effect on working hours. Other supply chain disruptions delayed sampling and production in Portugal and Lithuania. BlutsGeschwister accepted later delivery dates and opted for airfreight in the case of delays in Asia.

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: From the three Fair Wear audits conducted in 2021, two showed excessive overtime, while one audit showed that working hours had improved. Blutsgeschwister tries to get to the root causes of excessive overtime by sending questionnaires to the suppliers. It then differentiates between root causes that the company has influence over and root causes the supplier can only mitigate. Suppliers mention that workers want to work overtime. Still, the member is aware this is due to wages being lower than the living wage and therefore tackles this factor by working actively on living wage (see indicator 1.11).

Some Chinese suppliers also mention other factors contributing to excessive overtime, such as orders mainly being placed in peak season, delivery dates being kept while the fabric is delayed, and design changes after salesmen samples are approved. Blutsgeschwister discusses these outcomes internally but cannot shift the time of ordering for instance as it is bound by the sales period. As the brand is slowly decreasing at these suppliers, it also has not prioritized follow up on their suggestions.

Recommendation: Fair Wear recommends Blutsgeschwister to actively follow up on the outcomes of the root cause analysis.

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.	Advanced	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.	4	4	0

Comment: In 2021, Blutsgeschwister continued to roll out open costing at all its suppliers. The company now has insight into the labour costs of all of its products at seven suppliers. Blutsgeschwister has complete insight into the labour minute values at these factories and directly relates them to their prices. Blutsgeschwister keeps a structured overview of all this, including the FOB price increases needed in the coming years to contribute to a gradual wage increase at these suppliers (see also indicator 1.13). One supplier which is not willing to show the complete cost breakdown does offer a more general division of costs of the products (labour/fabric/other costs).

Blutsgeschwister has a team for responsible pricing, and they work on open costing. The target wage is fixed in the open costing sheet. The CSR responsible prepares the template for open costing and the fixed target wages before each pricing period. The CSR person and the purchasing team meet before each new season before costing starts and whenever there are adjustments to be made. Additionally, it is a business rule that new suppliers need to be open to open-costing as a requirement to start production at the site.

Two suppliers increased their prices to cover pandemic related costs, which Blutsgeschwister has accepted.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

Comment: Blutsgeschwister stayed on top of pandemic related developments in its production countries. If there was any doubt regarding the payment of wages, Blutsgeschwister asked its suppliers if workers continued to receive their wages. One factory in India had to close its doors briefly. The member checked whether wages continued to be paid and verified this with an audit after reopening. The member requested wage documentation from Chinese suppliers, verified by Fair Wear's local team. This documentation showed continued payment of at least the legal minimum wage.

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: Blutsgeschwister pays a 30% deposit at order placement. There is a payment schedule for the balance amount after receiving shipping documents. The audits conducted did not indicate late payments to the supplier by Blutsgeschwister.

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.	Advanced	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	6	6	0

Comment: Blutsgeschwister addresses the topic of wages below living wages with all its suppliers. Blutsgeschwister uses audits to verify the wage levels at the suppliers, in 2021 three audits were done. The company has created a root cause analysis document to investigate why wages are below living wages and shared this with its suppliers. Blutsgeschwister has a clear strategy with target wages set for its suppliers.

Blutsgeschwister kept in contact with the suppliers about the payment of wages throughout the pandemic and the suppliers assured her that the living wage gap did not increase due to the crisis. Blutsgeschwister verified this by requesting an overview of wages paid from the suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Advanced	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.	6	6	0

Comment: Blutsgeschwister has a clear time-bound plan of wage increases at its factories. In an overview, the company demonstrated per supplier what steps the company plans to take to contribute to a gradual increase in wages. The target wages are defined based on the benchmarks of the Global Living Wage Coalition, and it is noted how much % that is related to the Asia Floor Wage.

In this overview, the labour minute values per higher wage level are calculated, and these labour minute values are then used to calculate the labour cost per product and adapt the FOB prices accordingly. Three suppliers are not yet doing open costing, and therefore, the steps are not clear yet.

In the previous performance check, Blutsgeschwister received the recommendation to include worker representation in the target wage setting. Blutsgeschwister finds this challenging to do in China, given the restrictions on social dialogue. While the member has addressed this in emails, the member plans to discuss this in more detail when it can visit China again.

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.	85%	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.	6	6	0

Comment: Eight of Blutsgeschwister's suppliers pay the target wage or above, covering 85% of its total production volume. This is a significant increase from the previous year when the percentage was 53%.

Purchasing Practices

Possible Points: 52

Earned Points: 47

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	94%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	6%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	100%	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: Blutsgeschwister employs a CSR manager who has been in the position since 2017. The CSR manager is supported by the director of product development, purchasing & production. The CSR person used to work at Blutsgeschwister as a product developer, giving her a strong background and in-depth knowledge about production rhythms. In the past business year, there was a slight change made in the sourcing routine: the CSR person was actively looking for new specific product-related suppliers and was involved in all new sourcing decisions and had a regular monthly meeting with the CEOs of the company.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: Usually, the CSR manager visits all production sites once per year. During the visits, the CAP is discussed, and worker representatives are involved. Whether this is possible strongly depends on the production sites. At some, the CSR person is well known to the worker representatives; at others, it is difficult to establish a relationship.

In 2021, the CSR manager was only travelling to European sites due to travel restrictions. However, Blutsgeschwister continued to include worker representation in the opening and exit meetings and executed it at all factories where an audit took place. After an audit in a factory in India, the Workers Committee was involved in the CAP follow-up. The supplier informed Blutsgeschwister about the discussion points and how it plans to follow up.

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.	Advanced	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.	8	8	-2

Comment: CSR staff keeps an overview of all corrective actions and frequently contacts the suppliers to request updates. Usually, during yearly on-site visits, Blutsgeschwister discusses corrective actions with the factory management or agent. This was not possible in 2021 but will be done again in the future. Top management is involved in discussions of more severe issues. During the COVID-19 pandemic, the CSR manager shared the CAP and related workplan and asked the suppliers to input the work they had done. This exchange allowed Blutsgeschwister to continue CAP follow-up despite travel restrictions.

Despite the COVID-19 pandemic, audits were conducted at three suppliers in 2021. For two audits, another Fair Wear member was in the lead, and Blutsgeschwister could show it discussed remediation and was up to date about the status. For the other audit, it could show that many findings were remediated, including more complex findings. The factory started organising monthly awareness sessions to address the findings on low awareness of workers about labour rights.

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. Blutsgeschwister visited its suppliers in Portugal and Lithuania in 2021.

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: Blutsgeschwister continuously collects audit reports from its suppliers and follows up on them as part of due diligence. The quality of such reports is assessed, and corrective actions are implemented.

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: Blutsgeschwister monitors and analyses common risks for their sourcing countries and products using the information provided by Fair Wear (country studies, stakeholder information) as well as other non-governmental organisations.

Other risks:

India

Blutsgeschwister is aware of the common risks (bonded labour, gender-based violence) in India and continued efforts to mitigate these risks. Blutsgeschwister verified if the internal complaints committees were still meeting, which they were. One supplier temporarily had to close its doors during the lockdown. The supplier engaged in community activities by paying for oxygen when workers needed it and distributing food. Workers were paid during that time, and vaccination was arranged for workers, for which Blutsgeschwister offered to pay. In 2021, Blutsgeschwister enrolled its key supplier for the second time in Fair Wears WEP module targeting gender-based violence. Another Indian supplier participated in this training in 2019. The member also follows up on risks in fabric production such as spinning mills, one of which is enrolled in an ETI training programme. Blutsgeschwister keeps working on these risks, even though the company has already been doing so since 2015 and a lot of progress has been made, there is an understanding that this is an ongoing process.

China

Blutsgeschwister is aware of country-specific risks related to freedom of association and collective bargaining and the occurrence of excessive overtime. The member tries to improve social dialogue within the existing limitations of freedom of association, for example, involving worker representatives in the audit opening and exit meetings. Blutsgeschwister notices the challenges in China seem to be increasing and especially worries about the risk of forced labour. While this is currently not found in the company's supply chain (the member participated in an external screening), Blutsgeschwister recognises this is not a guarantee for the future. The company finds it is quite challenging to effectively mitigate the risk of bonded labour since the topic can hardly be discussed with Chinese suppliers. The member has already decided to ban cotton from China. Next to that, with the work on getting more transparency up until tier four as described under indicator 5.1, Blutsgeschwister knows increasingly where its material and trims come from. Blutsgeschwister maintains a constant dialogue about excessive overtime and supports its suppliers where possible by having long lead times (see also indicators 1.6 and 1.7).

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: Blutsgeschwister shares three factories with another Fair Wear member and cooperates in resolving corrective actions. The CSR managers meet regularly to discuss the status of resolving corrective actions at its shared suppliers. Meeting protocols are included directly in the corrective action plan and shared with the factory management after the meeting.

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.: N/A (N/A)

Comment: Blutsgeschwister follows all monitoring requirements for its locations in low-risk countries. The member visited suppliers in Portugal and Lithuania last year and could show documentation of the visit, including a health and safety check. Blutsgeschwister selects regularly audited factories and therefore does not need to commission audits but instead works with existing audit reports.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	Yes	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	2	2	0

Comment: Nine production locations fall under tail-end requirements. One tail end supplier in China has been audited by Fair Wear.

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: 25

Earned Points: 27

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 CSR Manager is responsible for handling the 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: All (new) suppliers agree to post the Worker Information Sheet, and Blutsgeschwister has uploaded evidence in the Fair Wear system.

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.	97%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: Since 2019, Blutsgeschwister enrolled production locations representing 97% of the total FOB in the Fair Wear Basic Workplace Education Program and the Fair Wear WEP module Violence Prevention Capacity Building. At the two Indian production sites where the violence prevention training took place, monthly internal complaints committee (I.C.C.) meetings are organised. Every three months, an external non-governmental organisation joined the meetings as required per law.

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: Blutsgeschwister received a complaint via Fair Wears helpline but since the complaint was found not grounded the indicator is non-applicable.

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

Comment: Blutsgeschwister has not received complaints at shared suppliers.

Complaints Handling

Possible Points: 9

Earned Points: 9

4. Training and Capacity Building

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

Comment: All staff is made aware of Fair Wear membership during the onboarding process. All staff in the stores receive a manual that includes information on Fair Wear membership. In 2021, CSR staff conducted only digital meetings for Blutsgeschwister's staff in contact with suppliers and in our retail stores. In addition, the member sent its staff a sustainability brochure to keep the staff not only informed and up-to-date, with personal stories from the production countries.

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: Every product developer (purchasing included) in contact with suppliers on CSR matters is trained on Fair Wear requirements and involved in the monthly Fair Wear meetings. In 2021 monthly meetings to inform everyone continued digitally and were mandatory for staff in contact with suppliers to attend.

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: The agents that Blutsgeschwister uses are entirely informed about everything, as this is how they maintain their relevance. They are involved in CAP follow-up, use the health and safety checklists and report back to the brand. During the height of the pandemic, the agents were the only ones who could still visit the factories, and Blutsgeschwister was able to share the Fair Wear guidance through them. Blutsgeschwister's buyer manual includes the CoLP and specifically mentions the importance of living wage and open costing.

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 training, this indicator is not applicable in 2021. Since 2019, Blutsgeschwister has enrolled its two Indian suppliers in a WEP Violence Prevention module, which totals 31% of the member's total FOB.

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: Blutsgeschwister could show it actively followed up on the WEP Violence Prevention Capacity Building training session, specifically focusing on promoting the sexual harassment policy.

Training and Capacity Building

Possible Points: 7

Earned Points: 7

5. Information Management

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

Comment: The CSR Manager has a background in fashion and sourcing at Blutsgeschwister with a clear understanding of processes and collections. In monthly meetings, the product developers identify the different processes needed to make the products. Due to this background, the CSR manager can match the production with the capacity of the factories, whether direct or indirect, to ensure that there are no hidden subcontractors. Regular visits have shown production at the sites agreed upon. Fair Wear audits did not show any hidden subcontractors.

In 2021 Blutsgeschwister established that for every collection, product developers need to request supply chain details from each supplier, providing detailed information from tier one to four. The member could show spreadsheets with details of material and trim origins for three suppliers.

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: There are meetings between CSR and production teams in which production-level information is shared internally with the different departments to keep everyone up to date with Fair Wear-related issues. All new colleagues are trained on membership when they start at head office and in retail stores. In addition, there is a good level of information sharing between CSR and marketing. Information about Fair Wear membership is also made available to the sales teams during the meetings twice a year.

Information Management

Possible Points: 7

Earned Points: 7

6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: There is a page on the website where the public can access relevant Fair Wear documents. Own magazines produced twice a year also have specific information on Fair Wear membership, themes and examples of their work in this area. Blutsgeschwister regularly participates in Fair Wear online campaigns. During the Brand Performance Check, no problems in compliance with Fair Wear's Communications Policy were found.

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: Blutsgeschwister discloses 100% of its suppliers on the Fair Wear website and details the various suppliers in its social report. There is a link between Blutsgeschwister's website and social media to keep their customer updated with the latest information, including updates on Fair Wear. A booklet available for B2B customers demonstrates the company's relationship with Fair Wear; the Code of Labour Practice is explained in an easy-to-understand format. Labels are provided for multi-brand locations to clarify that Blutsgeschwister is a Fair Wear member and, therefore, easy to identify when placed in busy stores. Blutsgeschwister publishes the Brand Performance Checks and social report.

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

Comment: Blutsgeschwister has submitted a complete and accurate social report to Fair Wear and published it on its website.

Transparency

Possible Points: 6

Earned Points: 6

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: Systematic evaluation takes place on an ongoing basis as the top management and CSR manager meet regularly. When the Brand Performance Check is received, the CSR manager evaluates the report, the recommendations and requirements and then organises a meeting with the CEOs and director of product development & purchasing. The team then decides how improvements are incorporated (the same process goes for the work plan).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Evaluation

Possible Points: 2

Earned Points: 2

Recommendations to Fair Wear

Blutsgeschwister recommends Fair Wear to provide brand performance check reports and social reports from all member brands equally. Up until today, there is no pattern in the display of social reports and brand performance check reports on Fairwear's website. Some reports are displayed, and some are not. The brands' reports should be displayed equally and on purpose to fulfil brands' transparency commitment.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	47	52
Monitoring and Remediation	27	25
Complaints Handling	9	9
Training and Capacity Building	7	7
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	105	108

Benchmarking Score (earned points divided by possible points)

97

Performance Benchmarking Category

Leader

Brand Performance Check details

Date of Brand Performance Check:

30-06-2022

Conducted by:

Self Assessment verified by Niki Janssen

Interviews with:

Katharina Fest