

Brand Performance Check OLYMP BEZNER KG

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

On COVID-19

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

OLYMP BEZNER KG

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

| Member company information | |
|--|---|
| Headquarters: | Bietigheim-Bissingen , Germany |
| Member since: | 2021-01-01 |
| Product types: | Garments, clothing, fashion apparel |
| Production in countries where Fair Wear is active: | Bangladesh, China, India, Indonesia, North Macedonia, Romania, Turkey and Vietnam |
| Production in other countries: | Austria, Croatia, Hungary and Italy |
| 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 | 65 |
| Category | Good |

Summary:

OLYMP showed progress and met most of Fair Wear's performance requirements in its first year of membership. With a score of 65 points, the member is placed in the 'Good' category. The member monitored 100% of its suppliers.

Please note that OLYMP consists of three different legal entities: OLYMP Bezner, OLYMP Retail and Marvelis. OLYMP Bezner and Marvelis are Fair Wear members. We will refer to OLYMP Bezner and Marvelis as OLYMP in this performance check.

Corona Addendum:

At the start of the COVID-19 pandemic in 2020, OLYMP was hit with a severe drop in turnover. In 2021, the year which is under assessment, the brand started to recover slightly. The brand did not cancel any orders and paid on time.

OLYMP monitored whether workers received at least the legal minimum wage during the pandemic. The brand regularly asked for pay slips and wage records to verify the payment of wages. However, at one Vietnamese supplier, where workers did not participate in 3-on-site (working, eating, sleeping on-site), they did not receive the legal minimum wage. The brand should take efforts to ensure workers still receive the legal minimum wage over this period.

Lockdowns, delivery issues, and the slight recovery from the brand led to several challenges for production planning. In dialogue with suppliers, the brand prioritized orders, shifted production, and accepted delays. It has a strong and integrated production planning system in place.

When exiting its Croatian supplier, the brand actively engaged with factory management to understand the consequences of the exit. It provided the supplier time to find another customer and investor. However, as they could not find another customer, the supplier was declared bankrupt. OLYMP should take all reasonable efforts to ensure that workers receive their full severance pay.

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. | 89% | Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes. | Supplier information provided by member company. | 4 | 4 | 0 |

Comment: In 2021, OLYMP had active relationships with 30 suppliers to produce shirts, knitwear, underwear and accessories. The brand has five main suppliers that produces over 80% of its total production volume. The other suppliers are often tail-end suppliers that produce specific products or are subcontractors that provide supporting processes such as embroidery. OLYMP had relationships with two Indian suppliers and started relationships with two other Indian suppliers. At the same time, the brand also started to source from Turkey.

Recommendation: Fair Wear recommends OLYMP to take leverage into consideration when moving its production to Indian and Turkish' production locations. The member 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. | 9% | 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: At 20 factories, OLYMP spends less than 2% of its own production volume. Before and during the COVID-19 pandemic, its main product, office shirts, were less in demand. Because of that, OLYMP started to diversify its product range and will continue to look for new products and suppliers in the near future.

Recommendation: Fair Wear recommends OLYMP to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, OLYMP should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

Furthermore, Fair Wear recommends OLYMP to take a strategic approach towards the expansion of its portfolio in which it also takes human rights risks and leverage at suppliers into account. It is advised to describe this in a sourcing strategy that is agreed upon with top management/sourcing staff.

| 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. | 96% | 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: OLYMP has long-term relationships with its suppliers and works in equal partnership with them. According to OLYMP, investing in production locations, understanding their challenges and providing support is key for its own business model and long-term guarantee of supply and high quality.

Recommendation: In diversifying its product range, Fair Wear recommends OLYMP to ensure it selects suppliers with whom it can build up a partnership, long-term relationships and obtain sufficient leverage to influence working conditions.

| 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 its first year of Fair Wear membership, OLYMP sent and collected the Fair Wear questionnaire from its suppliers. The brand went beyond by also including subcontractors that provide supportive processes in its first year. The brand did not collect one questionnaire from a supplier with whom relationships were stopped.

| 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. | Intermediate | 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. | 2 | 4 | 0 |

Comment: OLYMP conducted a product risk assessment (2019) and a country risk assessment (2020) for Bangladesh, China, Indonesia, Croatia, Northern Macedonia and Vietnam that listed risks related to the Fair Wear Code of Labour Practices. Information was collected through Fair Wear country studies and other NGO reports. The assessments were not updated in 2021. Decisions to enter a country are done based on generally known risks and not yet on a country risk assessment prior to the decision to enter a country. For example, it was decided not to source from Myanmar due to the well-known high risks. However, the CSR department was asked to provide specific country risks only after the sourcing department decided to explore collaboration with a new Turkish supplier.

During the second year of the COVID-19 pandemic, the brand actively collected information on risks related to the pandemic and linked these to its suppliers. In case of a lockdown, OLYMP engaged with the supplier to monitor that those wages were paid and workers received severance payment in case of lay-offs, such as in Vietnam. When an audit was not planned, the brand asked for supporting documentation, such as payslips. This information was not yet fed back into its more static country and product-risk assessment.

In its first year of its iMPACT audit programme (see 2.2), the member organised eight audits. Decisions to nominate a supplier were based on the expiry dates of existing audits. However, the existence of (very) high risks were not yet included in the prioritisation of planning audits.

Furthermore, two new suppliers were on-boarded. In the on-boarding phase, the supplier is requested to send in a range of documents including the Fair Wear questionnaire and an already existing audit report. The CSR-manager then compares the audit report to known country risks and engages with the supplier in case of questions. The CSR-team has equal weight in deciding to start a relationship with new suppliers.

Recommendation: Fair Wear recommends OLYMP to further strengthen its human rights due diligence by stronger linking the different elements of its product and country-specific risk assessment to ensure an on-going and continuous risk assessment that is actively shared with and updated by different departments. The brand should include (very) high risks in its decision to prioritise audits at particular production locations. Furthermore, OLYMP could strengthen the due diligence at new suppliers by entering into an active dialogue about working conditions and OLYMP requirements prior to on-boarding. In case existing audit reports are not of sufficient quality, OLYMP could consider organising an iMPACT-audit to learn more about the issues at the factory.

| 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. | No | 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. | 0 | 2 | ο |

Comment: OLYMP evaluates supplier performance in an informal way. Internally, the brand discusses and evaluates the progress suppliers make on quality, price, delivery time and working conditions. The member has not yet developed a formal supplier evaluation system with clear KPIs. Neither does the brand provide incentives to improve working conditions based on the evaluation.

During the COVID-19 pandemic, OLYMP was in regular dialogue with its suppliers to discuss production placement and planning. The brand did not cancel any orders although it was sometimes necessary to change or move production due to lockdowns or delivery issues. After a significant reduction of orders in 2020, the slight recovery of the brand in 2021 meant that the brand needed additional production capacity again. The brand then discussed with the factories where orders could best be placed. Often, factories were struggling to find workers again. In that sense, order placement was not so much done based on priority or performance in light of human rights due diligence but based on available capacity.

The brand ended relationships with one supplier. At the state-owned Croatian supplier with whom OLYMP had been working for more than fifty years, it had a very high leverage. In October 2020, OLYMP decided to stop at the supplier. In 2019, the brand had already cancelled the exclusivity agreement allowing the supplier to look for other customers. In 2020, OLYMP ended relationships with the factory and gave as reasons the lack of transparency on the privatizatio process of the supplier, unreliable planning and concerns over innovation, which it had raised on several occasions with the supplier. At the same time, the state wanted to sell the supplier and OLYMP was also asked to buy the supplier, which it declined as it is company policy not to own any production locations. Throughout this period, the state kept looking for an investor. Discussions were held with a potential investor, but this did not lead to a take over. When COVID-19 hit, orders continued, but the supplier asked the brand to reduce OLYMPs' reserved production capacity so that it could produce facial masks. In July 2020, an audit was conducted that did not identify unpaid wages, but did show that time records were not transparent and were not acknowledged by the workers as correct. The brand then followed up by asking for the correct time records which it did not receive.

OLYMP remained in dialogue with the supplier about an investor and other customers where factory management assured them that they will find a new customer. The brand remained in dialogue prior, during and after it announced in October 2020 it would exit the factory. The last orders were produced in April 2021. Although the brand was in dialogue about the consequences of its exit and received reassurances from factory management that the workers could continue working, the brand did not set up a phase out plan together with factory management and the trade union in case no investor or customer was found.

In the end, no customer was found after which the factory became insolvent and was declared bankrupt. On several occasions after the bankruptcy, OLYMP engaged with factory management, the insolvency administrator, the trade unions and the CCC about resuming production, the payment of wages and severance pay. In October 2021, the Croatian court provided a ruling on the severance pay, which resulted in workers receiving a part of their legally owned severance pay through the state fund as immediate relief. However, this does not cover the full severance payment and the other part should be received after the liquidation process has been completed. OLYMP then requested the insolvency administrator to provide more information on the sales of assets and the remaining unpaid severance pay, and after several reminders received this information partially in 2022. The member actively engaged with factory management and the other stakeholders to monitor whether the supplier is compliant with severance laws and whether the supplier is financially able to cover those costs. As the process is still ongoing, Fair Wear will assess to what extent the brand monitored and ensured the full payment of the legally owned severance pay in the next brand performance check.

Requirement: OLYMP should take all reasonable efforts to ensure that the Croatian workers receive their full severance payment, also taking the high leverage it had at the supplier into account.

Recommendation: Fair Wear recommends OLYMP to setup a phase out plan together with factory management and worker representatives when exiting a factory. At a minimum, such a phase out plan should provide clarity on how orders will be reduced over time and in case workers need to be laid off, contain clarity on the severance payment workers should receive and how that will be paid for.

Fair Wear encourages OLYMP to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a system can show whether and what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

| 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: Production planning usually starts 14-18 months with capacity planning. Orders are placed 7-12 months in advance but these orders do not have to contain orders for material yet, that will be done with the fixed order placement. OLYMP nominates the material suppliers and also takes the lead time for fabric delivery into account when planning production. OLYMP follows a detailed production planning where it looks at when products need to be in and then sets specific dates for when fabric needs to be ordered, fixed orders need to be provided, etc. to ensure timely production.

OLYMP plans production differently per product group and sales channel. For its shirts, OLYMP reserved production capacity at its main suppliers by reserving specific production lines. OLYMP knows the output per production line and the total production capacity of a factory. The brand then discussed capacity and production with its suppliers on a weekly basis, ensuring that production lines were filled. OLYMP sells seasonal products, private label, through tenders and Never Out of Stock-items (NOS). If a tender takes priority, the brand can then switch it around with its NOS-production. Four out of its five main suppliers provide the working hours on a weekly basis that allows OLYMP to monitor whether production does not lead to (excessive) overtime.

For its other products, the brand does not reserve capacity, but discusses lead times with its suppliers and also discusses when fixed orders need to be provided. OLYMP is aware of the total production capacity of these suppliers, but has less insight into the use of the capacity.

In the first year of the COVID-19 pandemic, the brand sold significantly less products that caused the brand to reduce production capacity and in some cases also had to let go of reserving production capacity. In 2021, the brand slightly recovered after which the brand had to look for additional production capacity again. The brand did this in consultation with its suppliers. Furthermore, due to lockdowns in production countries, production was some delayed. The member allowed for longer lead times, prioritised orders and discussed late delivery with customers.

Recommendation: Fair Wear recommends OLYMP to go back to reserving production lines again to ensure a stable order flow for the factories. Together with its suppliers where excessive overtime takes place, Fair Wear recommends OLYMP to assess root causes and to verify whether production is planned with overtime or not. If production is planned with overtime, the brand should do a risk assessment and ensure that its products can be produced in regular working hours. Furthermore, we recommend OLYMP to balance orders throughout the season for its non-shirt suppliers as much as possible.

| 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 collected audit reports, OLYMP learned about issues around working hours at four Chinese factories and an Indian factory. Most issues concerned transparency of working hours and the recording of working hours. The brand monitored two Bangladeshi factories through an iMPACT programme audit which showed similar issues. The member is actively following up with the factories to increase transparency in working hours.

Furthermore, in dealing with the lockdowns in Vietnam, the brand closely engaged with the factory to plan production after the factories were re-opened. Orders were prioritized or shifted and longer lead times were provided. However, the factory also requested to do more overtime hours (not exceeding the legal overtime hours per week) and work two Sundays per month. OLYMP agreed to this to support the factory in recovering from a lack of production during the lockdowns. However, workers should have a day off for every seven-day period to prevent excessive overtime. **Requirement:** When its (Vietnamese) suppliers request allowing workers to work more than 6 days consecutively for OLYMPs' production, OLYMP should not agree to working days exceeding legal limits even in case of exceptional circumstances such as lockdowns due to the COVID-19 pandemic. The brand should then enter into a dialogue with the supplier to find other solutions to prevent excessive overtime.

Recommendation: OLYMP could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, OLYMP could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request. Fair Wear recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

| 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. | Ο | 4 | 0 |

Comment: OLYMP discusses the prices of the shirts in a collaborative way with its suppliers. The brand knows about the price build up and actively collects supplier information on wages and working hours. Price increases through wage increases are generally accepted. However, it does not yet know the labour minutes which is needed to link wages and prices. Neither does the brand estimate prices prior to placing orders to check that prices would be sufficient to cover the labour costs.

Requirement: OLYMP 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.

Recommendation: Fair Wear recommends OLYMP to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices, for example by using the FairPrice app. The FairPrice app also enables suppliers to include any COVID-19 related costs. OLYMP BEZNER KG could consider offering training by a local representative on FairPrice to its suppliers. Such training is available in all Fair Wear countries.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------|---|---|-------|-----|-----|
| 1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid. | Yes | If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently. | Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved. | 0 | 0 | -2 |

Comment: OLYMP followed up on legal minimum wage issues that were identified at three suppliers. At one Chinese supplier, wage records were not transparent. The brand is engaging the factory to increase transparency and requested time and wage records. At two Indian suppliers, workers were paid in accordance with the legal minimum wage levels for hosiery instead of tailoring. The brand discussed which legal minimum wage applies with its agent and Fair Wear. Although it is not illegal to pay the LMW for hosiery, Fair Wear recommends its members to ensure that workers are paid the higher legal minimum wage for tailoring. There were also issues with transparency of working hour records. OLYMP mainly focuses on transparency of records.

Indonesian law allowed its Indonesian supplier to negotiate wages with the trade union below the provincial legal minimum wage. Factory management and the trade union agreed to pay the lower district legal minimum wage. The brand learned about the lower legal minimum wage through its iMPACT programme audit. It then engaged with Fair Wear country staff, the factory trade union and the factory to learn more about the situation. Wages for 2021 were paid in line with the district legal minimum wage, while the brand engaged the factory to ensure that workers would receive their regular (provincial legal minimum) wages for 2022.

During the lockdown in Vietnam, its two Vietnamese suppliers had a separate approach. One factory decided to close and pay the legal minimum wage to the workers. OLYMP verified this by asking for wage records and pay slips. The other factory implemented 3-on-site, meaning that workers were working, eating and sleeping in the factory and were not able to go outside. Workers were provided the choice to do 3-on-site or not work. Contracts of workers that chose not to work were paused and also did not receive their wages. OLYMP did not yet actively follow up to ensure that workers who did not work received at least the legal minimum wage.

Requirement: OLYMP should actively follow up with its Vietnamese supplier to ensure that workers who did not participate in 3-on-site at least receive the legal minimum wage.

Please note that this is a repeated non-compliance indicator. However, despite the member receiving a requirement, it also scored 'yes' on this indicator, meaning that a 'no' score in the next performance check will not lead to 'needs improvement'.

Recommendation: For its Indian suppliers, OLYMP should make sure that wages are paid at tailoring industry rates, as the wage of hosiery industry is 40% short of the tailoring 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 | Ο | -1 |

Comment: OLYMP has different agreements with its suppliers on payment terms. Some are paid through a Letter of Credit, which means suppliers are paid when the goods are on the ship or plane. Others are paid through TT payment, which means that payment is done when an invoice is sent and the goods arrive in Germany. This means that all products are paid before or upon receipt of the products.

During the COVID-19 pandemic, the brand did not pay late. Neither did it ask for discounts or reduce prices.

The brand does support several of its suppliers by pre-financing fabric and materials.

| 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: OLYMP actively collected wage information from its suppliers. It does this through the audits in its iMPACT-programme and by asking for wage sheets on an annual basis. Wage information includes actual wages and living wage benchmarks. The brand did not yet actively assess the root causes per supplier.

Recommendation: Fair Wear encourages OLYMP to involve worker representatives and local organisations in assessing root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

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

Comment: OLYMP does not own any production location.

| 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: In its first year of membership, OLYMP focused on getting insight into wage levels. The brand has not yet agreed on target wages with its suppliers.

| 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 |

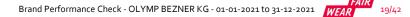
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Comment: The brand has not yet set any target wages. None of its suppliers meet the living wage benchmarks.

Additional comments: Olymp consists of three different legal entities: Olymp Bezner, Olymp Retail and Marvelis. Olymp Bezner and Marvelis are Fair Wear member. In this performance check, we will refer to Olymp Bezner and Marvelis as Olymp.

Purchasing Practices

Possible Points: 52 Earned Points: 22



2. Monitoring and Remediation

| Basic measurements | Result | Comments |
|--|--|--|
| % of production volume where an audit took place. | 98% | |
| % of production volume where monitoring requirements for low-risk countries are fulfilled. | 1.5% | To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.) |
| Member meets monitoring requirements for tail-end production locations. | First or second year member and tail-end monitoring requirements do not apply | 1st or 2nd year member and tail-end monitoring requirements do not apply. |
| 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: Olymp has two CSR staff persons that 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. | Yes | In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system. | Information on audit methodology. | 0 | 0 | -1 |

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Comment: Together with Fair Wear member Hakro, OLYMP has set up its own auditing system called the iMPACT-programme. This programme consists of tailor-made audits around which the brands focus their remediation efforts. The audits make use of a Worker Sentiment Survey, which is a mobile phone survey which covers 15 questions on plans to stay at the factory, the relationship with their supervisor, trust in grievance mechanisms, working hours and wages. Workers fill this in anonymously. In 2021, the brands have been in regular discussion with Fair Wear to align their methodology with Fair Wear's.

The audits meet Fair Wear's standards, although information on a range of topics, such as living wages are not sufficiently covered or integrated yet.

Recommendation: Fair Wear strongly recommends OLYMP to further align the iMPACT programme with Fair Wear's audit methodology.

| 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: OLYMP shares the audit report and remediation plans in a timely manner. After the brand shared the report, the factory is requested to respond and propose improvement timelines, after which this is discussed with the brand. Worker representatives are invited to participate in closing meetings of the audit, but do not yet receive the audit reports and are not yet included in the follow up.

Recommendation: Fair Wear recommends OLYMP to ensure that worker representatives receive a copy of the audit report in a language accessible to them. When following up on audit reports, it gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------------|--|--|-------|-----|-----|
| 2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems. | Intermediate | Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions. | CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues. | 6 | 8 | -2 |

Comment: OLYMP actively follows up on issues identified in the audit reports. It regularly discusses issues with the suppliers and tracks progress made. When suppliers indicate that issues have been resolved, OLYMP asks for additional proof, such as photographic evidence, documentation or a check upon visiting the factory by the CSR-staff. The agents and Quality Control-staff are not yet actively involved in following up on CAPs, while they are on-site. In its first year of Fair Wear membership and the iMPACT-programme, the member audited more than half of its production volume through the iMPACT-programme, but has not yet used the auditors to verify progress made for document checks or monitoring visits.

In its first year, OLYMP followed up on findings related to wages, working hours, excessive overtime and gender-based violence. Although the iMPACT-audits check whether worker representatives are present and have an active dialogue with management, they are not yet actively included in remediation. The brand did not check whether workers are included in decisions for COVID-19 specific measures.

Recommendation: The feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. OLYMP can use its audit team to verify the supportive evidence in case that is desirable for example through monitoring visits. Furthermore, Fair Wear recommends OLYMP to engage more actively with worker representatives in the remediation of issues.

| 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.

Recommendation: Fair Wear recommends OLYMP to resume visiting its suppliers again and especially focus on building awareness on the Fair Wear CoLP, living wages and social dialogue.

| 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: OLYMP actively collects existing audit reports from its suppliers. After receipt of the audit report, the quality of the report is assessed and a CAP is made. The brand also collects audit reports of production locations where an iMPACT-audit took place to check whether similar issues were found and whether any progress has been made.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|---|--|--|-------|-----|-----|
| 2.7 Compliance with FWF risk policies. | Average score depending on the number of applicable policies and results | Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear. | Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents. | 3 | 6 | -2 |
| Compliance with FWF enhanced monitoring programme Bangladesh | Intermediate | | | 3 | 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 | Intermediate | | | 3 | 6 | -2 |
| Other risks specific to the member's supply chain are addressed by its monitoring system | Intermediate | | | 3 | 6 | -2 |

Comment: Bangladesh:

OLYMP is a member of the Bangladesh Accord. Its five Bangladeshi suppliers are actively monitored by the Accord. Often, few issues remain for the factories to resolve. One case of unapproved subcontracting was found. This factory was part of the same group of the main factory and also falls under the Accord. Furthermore, the brand found one subcontractor for washing.

OLYMP organised iMPACT-audits at three Bangladeshi suppliers and collected audit reports for two more suppliers. OLYMP wishes to ensure a high quality of its audits, but did not yet integrate specific expertise on risks related to Occupational Health and Safety and Gender-based Violence. In one of its worker sentiment surveys, verbal abuse was identified. The brand is now planning a WEP Violence and Harassment Prevention-training.

Turkey:

Turkey is a new country for OLYMP. The brand started relationships with an agent. The brand discussed Fair Wear's policy on Syrian refugees with its agent after which the agent excluded several potential production partners. The brand then started to work with one Turkish supplier so far. The production location was shared with several Fair Wear members. In the end, the collaboration was stopped by the Turkish supplier when the brand wanted to plan an iMPACTaudit.

COVID-19:

OLYMP actively followed up on the risk of non-payment of (legal minimum) wages and severance payment. The brand also made steps to get insight into the loss of jobs at factories. Now that OLYMP is recovering from the pandemic, there is a need for extra production capacity which its current suppliers do not always have available due to the dismissal of workers. In 2020, the brand already sent around a letter with OHS guidelines and a specific questionnaire. However, OHS was mainly monitored through the audits. During the COVID-19 pandemic, the member did not yet check to what extent workers and their representatives were involved in decisions related to COVID-19 that directly affected them.

Other:

The brand is aware of the risk of forced labour through its Chinese suppliers. In December 2020, OLYMP received a report from Fair Wear linking forced labour to its supply chain in China. The follow up of the brand will be assessed in the next performance check.

Recommendation: Bangladesh:

Fair Wear recommends OLYMP to ensure that its iMPACT-programme has integrated specific expertise to identify, monitor and remediate country specific risks in Bangladesh, especially related to OHS and GBV. Furthermore, we recommend OLYMP to ensure that all its factories have functioning anti-harassment committees and provide training through Fair Wear's Workplace Education Programme.

Turkey:

Fair Wear strongly recommends OLYMP to consider the human rights risks and entry costs to become active in Turkey. Furthermore, we recommend OLYMP to ensure that a factory agrees to OLYMP's requirements on social compliance prior to starting a business relationship. The member could consider providing training and conducting an audit before starting the relationship.

COVID-19:

Fair Wear recommends OLYMP to engage with factories to seek active support for additional production planning and to ensure that former workers are hired as much as possible. Furthermore, we recommend OLYMP to include workers and their representatives more actively in the follow up of issues.

Other:

Fair Wear recommends OLYMP to assess the risks related to forced labour in its supply chain. We can recommend organisations that can provide support in identifying forced labour deeper in its supply chain. We recommend OLYMP to actively follow up on the reports provided and to responsibly exit suppliers where needed.

| 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: OLYMP actively collaborates with several Fair Wear members at shared suppliers. However, the brand shares more suppliers with Fair Wear members where collaboration yet has to start.

Recommendation: Fair Wear recommends OLYMP to learn more about shared suppliers and set up collaboration with other Fair Wear members.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|--|---|-------|-----|-----|
| 2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled. | 100% | Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries. | Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires. | 2 | 2 | 0 |

Member undertakes additional activities to monitor suppliers.: Yes (1)

Comment: OLYMP sourced from three suppliers that were located in Hungary, Croatia and Austria, which accounted for less than two percent of its production volume. The member collected the questionnaires and worker information sheets. However, due to the precarious situation at its Croatian supplier, the brand decided not to follow through on the questionnaire and sheet. An audit was held at its Croatian supplier to monitor working conditions.

| 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 |

| 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 |

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| 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. | Yes, and member has information of production locations | 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. | 1 | 1 | ο |

Comment: OLYMP has one licensee which uses a production location of OLYMP. Prior to starting the agreement, the brand explained its commitment to decent working conditions. The questionnaire was only collected in 2022, but since the brand already knew the production location, full points are awarded.

Monitoring and Remediation

Possible Points: 27

Earned Points: 22

3. Complaints Handling

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

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|--|---|-------|-----|-----|
| 3.1 A specific employee has been designated to address worker complaints. | Yes | Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis. | Manuals, emails, etc., demonstrating who the designated staff person is. | 1 | 1 | -1 |

Comment: Olymp has two dedicated CSR staff members who follow up on worker complaints.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|---|--|-------|-----|-----|
| 3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline. | Yes | Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations. | Photos by company staff, audit reports, checklists from production location visits, etc. | 2 | 2 | -2 |

Comment: OLYMP has a system in place to check whether the Worker Information Sheet is posted in its factories. The brand makes use of audits, on-site visits and photographic evidence to check whether the sheets are posted. However, irregularities were found in a couple of cases.

Recommendation: Fair Wear recommends OLYMP to check whether the correct sheet is posted and whether the sheet is posted in at a location that is easy accessible and safe for workers.

| 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: During the audits of its iMPACT-programme, worker information cards are actively distributed among workers.

Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

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

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

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Complaints Handling

Possible Points: 3

Earned Points: 3

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: Due to the COVID-19 pandemic, OLYMP was not able to organize a large staff meeting to announce Fair Wear membership. It did so via its intranet and internal publications.

Recommendation: It is advised to develop a standard procedure for all new employees to get familiar with Fair Wear membership. Fair Wear has material available that can be used to inform (sales) staff.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------|---|--|-------|-----|-----|
| 4.2 All staff in direct contact with suppliers are informed of FWF requirements. | Yes | Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations. | Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc. | 2 | 2 | -1 |

Comment: CSR staff of OLYMP actively informed the purchasing department of Fair Wear requirement through meetings and presentations. Audit outcomes are also shared with buyers and they are included in calls when audit follow up is discussed with the factory.

Recommendation: Fair Wear encourages OLYMP to train purchasing staff and its agents on the audit process, remediation and purchasing practices and to include them more actively in the follow up on corrective action plans.

| erformance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|---|--|-------|-----|-----|
| 3 All sourcing contractors/agents are informed out 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: OLYMP works with seven agents. The agents are informed of Fair Wear membership and the expectations with regards to improving working conditions. Four updates were shared with the agents, in which the grievance mechanism was also highlighted.

Recommendation: Fair Wear recommends OLYMP to actively train its agents on monitoring and remediating genderrelated problems and enable them to support the implementation of the Fair Wear 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 of conducting training, 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

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: OLYMP has a policy in place for subcontracting. This is allowed but needs to be approved beforehand. The brand conducted a product risk assessment in which it assessed whether all processes needed to produce a particular product can be done at the production location.

Through audits and on-site visits, the member checks for subcontracting. The brand aims to visit all factories once a year, especially when production takes place. However, in 2021 few visits were made. QC-staff is present at four of its five main suppliers and actively checks for subcontracting through in-line inspections. At one Bangladeshi supplier, OLYMPs' travelling technicians found the unapproved use of subcontracting.

At several suppliers, OLYMP already identified the use of subcontractors that are used for supporting processes and started to include them in its monitoring system.

Recommendation: Fair Wear encourages OLYMP to start visiting the factories again more actively. Furthermore, we encourage OLYMP to continue the identification of subcontractors that provide supporting processes and include them in its monitoring system.

| 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: CSR staff share a summary of the audit reports with its buyers. Travel reports are also shared but due to the COVID-19 pandemic, few visits to factories were made. The OLYMP Quality Control staff that are located at factories are not highly involved in monitoring working conditions, but do monitor subcontracting and keep an eye on working hours.

Recommendation: Fair Wear recommends OLYMP to further integrate and share information about working conditions of production locations with relevant staff. Buyers could be given a bigger role in monitoring the link between wages and prices, while QC-staff could also be involved in following up on health and safety-issues. We encourage OLYMP to agree with factories how to monitor working condition and how QC-staff could be of support to both parties.

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: OLYMP communicates about Fair Wear Foundation on its website, social media and its sustainability report. A minor issue was found during the performance check which OLYMP agreed to correct.

| 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: OLYMP disclosed 99% of its production volume to other Fair Wear members in Fair Force, Fair Wear's internal data management system. OLYMP is discussing with its suppliers to disclose them on the Fair Wear website. In its sustainability report, the production locations are already disclosed.

This is OLYMP's first Brand Performance Check report and hence, no previous reports could be published online.

Recommendation: Fair Wear recommends OLYMP to publish its first Brand Performance Check report online.

| 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: OLYMP has a sustainability report in which it also reports on the progress made on improving working conditions. The report was shared with Fair Wear and published online.

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: This is Olymp's first performance check. Therefore, an evaluation of the check's result has not yet been held.

The CEO, CFO, CPO, Corporate Responsibility staff, Marketing, the Area Manager Supply Chain come together twice a year to evaluate the progress made on implementing and integrating human rights due diligence and progress on Fair wear requirements in the company. Strategic decisions towards sustainability are taken during these meetings.

| 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

- OLYMP would like to have more information and guidance on how to involve its agents in improving working conditions
- OLYMP would also like Fair Wear to be more clear on which documents they can or cannot share with suppliers
- OLYMP would also like more guidance on supplier engagement e.g. on how suppliers can improve and how OLYMP could support that process.
- OLYMP recommends Fair Wear to ensure that information is more easily accessible and traceable on the member hub.
- OLYMP recommends Fair Wear to stay focussed as a specialist and maintain its high credibility and standards.

Scoring Overview

| Category | Earned | Possible |
|--------------------------------|--------|----------|
| Purchasing Practices | 22 | 52 |
| Monitoring and Remediation | 22 | 27 |
| Complaints Handling | 3 | 3 |
| Training and Capacity Building | 4 | 5 |
| Information Management | 7 | 7 |
| Transparency | 6 | 6 |
| Evaluation | 2 | 2 |
| Totals: | 66 | 102 |

Benchmarking Score (earned points divided by possible points)

65

| Performance Benchmarking Category | |
|-----------------------------------|--|
| Good | |

Brand Performance Check details

Date of Brand Performance Check:

02-05-2022

Conducted by:

Wilco van Bokhorst

Interviews with:

CEO & owner: Mr. Bezner Director Operation & Purchase: Mr. Trischberger Head of Accounting: Mrs. Wolkenhauer Head of Corporate Responsibility: Ms LaCombe Corporate Responsibility Manager Social Compliance: Ms Zitzelfsberger