

# Brand Performance Check SALEWA, DYNAFIT, Wild Country & LaMunt

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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> 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**

## **SALEWA, DYNAFIT, Wild Country & LaMunt Evaluation Period: 01-01-2021 to 31-12-2021**

Member company information					
Headquarters:	Bolzano , Italy				
Member since:	2013-09-24				
Product types:	Outdoor products; Outdoorwear				
Production in countries where Fair Wear is active:	Bangladesh, China, India, Myanmar, Romania, Tunisia, Turkey, Viet Nam				
Production in other countries:	Albania, Austria, Belarus, Cambodia, Czechia, Germany, Italy, Lithuania, Republic of Moldova, Slovakia, Slovenia, Switzerland, Taiwan, Ukraine				
Basic requirements					
Scoring overview					
% of own production under monitoring	79%				
Benchmarking score	79				
Category	Leader				

## **Summary:**

SALEWA, DYNAFIT, Wild Country & LaMunt has shown advanced results on performance indicators and has made progress. With a benchmarking score of 79, SALEWA, DYNAFIT, Wild Country & LaMunt is once again placed in the Leader category. The member has fulfilled the monitoring requirements at suppliers covering 79% of its production volume.

#### **Corona Addendum:**

With the increased demand for outdoor products, 2021 was SALEWA, DYNAFIT, Wild Country and LaMunt's best year yet. COVID-19 continued to impact the member's supply chain. However, as it preponed the forecasting, leading to an extension of lead times by at least one to three months, the production for the member was not too much impacted by the lockdown in Vietnam as most production was already in the finishing stage. By starting the forecasting much earlier, the member enables suppliers to spread orders and ensure material is bought well in advance. In cases where orders were delayed, these were accepted without negotiating discounts.

Despite the pandemic, the local quality controllers based in Bangladesh, China, Myanmar and Vietnam continued to visit production locations. This way, the member could continue monitoring its supply chain when audits were often impossible. The company immediately started gathering information about local regulations when factories closed in Vietnam. By requesting its suppliers to complete a thorough questionnaire, SALEWA, DYNAFIT, Wild Country & LaMunt collected detailed information about wage payments and government subsidies that workers received. The company plans to organise audits for its Vietnamese suppliers to assess wage documentation. Fair Wear strongly recommends that the member decides on the follow-up of the below legal minimum wage payments as soon as the information is verified.

The member is recommended to ensure it follows up on urgent CAP findings sooner. When follow-up stalls, the company could use different tools than CAP exchange or sending of emails. Fair Wear recommends the company reassesses the supplier evaluation system to ensure that it does not portray a too optimistic picture of suppliers with continuous concerning CAP findings.

Positive is the continuation of the member's living wage work. The company uses a costing tool that calculates using labour minutes and the target wage, which SALEWA, DYNAFIT, Wild Country and LaMunt increased to 130% of the legal minimum wage in 2021. The member could show that this is paid for most workers at 17 of its suppliers.

SALEWA, DYNAFIT, Wild Country and LaMunt recognise the importance of social dialogue for enabling labour rights to be respected. The member started collecting information about the existence and functioning of worker representation at all its suppliers.

## **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.	64%	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:** At 64% of its suppliers, SALEWA, DYNAFIT, Wild Country & LaMunt buys at least 10% of production capacity. This percentage has steadily increased over the last few years. Supply chain consolidation is central to the sourcing strategy of SALEWA, DYNAFIT, Wild Country & LaMunt. Between 2020 and 2021 the member consolidated the number of factories from 66 to 63. However, the member needs specialised suppliers for its technical accessories.

In 2021 SALEWA, DYNAFIT, Wild Country & LaMunt stopped with 16 suppliers and started with 11 new suppliers. Some suppliers decided to allocate production to another facility. Next to that the member also tries to limit the number of small suppliers in China. The reason for starting most of the other new business relations was the need for new technical or specialised partners. SALEWA, DYNAFIT, Wild Country & LaMunt added the remaining three factories due to the termination of other relationships and strategic decisions.

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.	23%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

**Comment:** 23% of the production volume from production locations comes from sites where SALEWA, DYNAFIT, Wild Country & LaMunt buys less than 2% of its total FOB.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT, Wild Country & LaMunt to continue consolidating its supply base by limiting the number of production locations in its 'tail end'. To achieve this, SALEWA, DYNAFIT, Wild Country & LaMunt 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.

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.	69%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

**Comment:** In 2021, 69% of its total FOB volume came from factories SALEWA, DYNAFIT, Wild Country & LaMunt has been working with for more than five years. For the member, one of its primary objectives regarding supply chain management is establishing long-lasting relationships with suppliers to maximise mutual benefits.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

**Comment:** In 2020, SALEWA, DYNAFIT, Wild Country & LaMunt started working with 11 new factories. The member could show it received signed questionnaires from these suppliers. Collecting and approving the questionnaire is part of SALEWA, DYNAFIT, Wild Country & LaMunt's due diligence process before starting production with any new location.

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: SALEWA, DYNAFIT, Wild Country & LaMunt has a written, systematically organised due diligence process followed when starting at new production locations. It outlines the required steps for various departments, including sourcing, production, and CSR. The sourcing director makes the final decision on adding a new supplier when necessary. The selection is made alongside the close support of the sustainability team. Before a new supplier is selected, relevant country-specific high-risk issues are checked. A thorough factory self-assessment and an assessment by the quality control staff are conducted. Any existing audit reports are collected during the visit, and a corrective action plan is created before production begins. SALEWA, DYNAFIT, Wild Country & LaMunt requires new suppliers to provide transparent costing sheets, which is communicated from the beginning.

In 2021 the member started with 11 new suppliers. One of those suppliers is from Turkey, and the member considers it an advantage that another Fair Wear member was already sourcing there. The company could show that CSR informed operations about the specific country risks. The member followed the onboarding process described above and visited the location twice. There were no audit reports in 2021, but as soon as the factory received an audit in 2022, the member received it.

The due diligence steps needed per country are also informed by the outcome of the supplier evaluation system (see indicator 1.5). The results of this evaluation are grouped per country, giving a clear overview of which labour rights are at risk in the different sourcing countries. This year the member started collecting more information on the situation regarding social dialogue at their suppliers. The member could show a spreadsheet detailing information about social dialogue mechanisms at their suppliers and whether they work. The idea is that workers at suppliers with an effective social dialogue mechanism can address labour rights issues directly and that suppliers without an effective social dialogue mechanism are more at risk.

During the second year of the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt continued its monitoring primarily via the visits of its Quality Controllers stationed in Bangladesh, China, Myanmar and Vietnam. Next to that, the member organised two Fair Wear audits. The member identified below legal minimum wage payment as the most considerable risk in 2021, especially in Vietnam during the closure of the factories. It teamed up with other Fair Wear members sourcing in Vietnam to create a detailed questionnaire regarding the payment of workers. See indicator 1.9 for more information.

**Recommendation:** Even though the company culture is such that purchasing checks automatically in with CSR when considering new sourcing countries/ locations, Fair Wear recommends the member to discuss whether CSR could have explicit veto power when it comes to new countries and suppliers. In this way, this step is not dependent on a working culture that may change over time.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

**Comment:** SALEWA, DYNAFIT, Wild Country & LaMunt has a system to evaluate suppliers' social compliance status based on audit findings from different audits and progress towards follow up by each supplier. The performances of suppliers are compared to one another and tracked over the years on three levels:

- 1. Specific audit findings
- 2. All findings related to one labour standard combined: such as the aggregated results on overtime and living wage
- 3. The overall supplier performance related to all labour standards and its responsiveness, willingness and proactiveness to prevent and mitigate.

SALEWA, DYNAFIT, Wild Country & LaMunt incorporates supplier performance related to CoLP compliance in regular department meetings because it has strong links to consistent orders and continuity of quality. Therefore, the outcomes of supplier evaluations influence the production decision process. The review of the suppliers was used in deciding about the allocation of suppliers for the new brand, LaMunt. The member does not want to penalize suppliers who score less good but instead aims to invest in their progress. The member showed the evaluation form of a supplier in Bangladesh with continuous, very concerning audit results. The evaluation form does not reflect this and gives the idea of an average or good factory.

Between 2020 and 2021, SALEWA, DYNAFIT, Wild Country & LaMunt stopped sourcing at 16 factories. With five factories, the member had leverage between 18 and 58%. Some of these suppliers consolidated production in one location. In the other cases, the member has flagged the exit several years in advance and gradually decreased its orders, following Fair Wear's responsible exit strategy.

**Recommendation:** Fair Wear strongly recommends SALEWA, DYNAFIT, Wild Country & LaMunt to evaluate its evaluation system and ensure it gives a more accurate reflection of the audit results and the factory's willingness to take these up.

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:** In its production planning, SALEWA, DYNAFIT, Wild Country & LaMunt calculates back; factories are asked when material needs to be in to have the order ready at a specific time. The member then asks the material suppliers when they need to receive the final forecasts to be able to deliver the material at that time. By cooperating this closely with material suppliers, the member hopes to prevent material delay, which is one of the main root causes of excessive overtime.

Each delivery date is calculated by considering the factory's capacity, which is then updated every month. In case of a production delay, the brand is flexible with delivery dates or agrees on shipment via air. SALEWA, DYNAFIT, Wild Country & LaMunt does not place urgent orders that can put its suppliers under unnecessary stress. It confirms samples on time, enabling smooth and efficient product development. After each season, the member evaluates its orders, looking at how close the actual delivery of each stage was to the plan.

In 2021, SALEWA, DYNAFIT, Wild Country & LaMunt started to prepone the forecasting with one to three months, which leads to a longer lead time. In May 2021, forecasting was done for autumn/winter 22. Because of this long forecasting, the lockdown in Vietnam led to a much shorter delivery delay than it usually would. The member accepted all delays in 2021 without negotiating discounts.

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: During two audits in 2021, the Fair Wear teams found non-compliances regarding working hours. One audit was only done in November, and therefore the follow-up will be considered for the next performance check. In response to the other audit finding, the member analysed with the production departments which orders could have led to excessive overtime. It could identify that the delay of poles (for the order of tents) and trims and a temporarily lower efficiency percentage could have been a factor. In the communication with the supplier, SALEWA, DYNAFIT, Wild Country & LaMunt emphasised that there was an opportunity to extend the lead time if requested. Still, the supplier did not take the member up on its offer. Via the CAP, the member has asked the supplier about the root causes of the overtime hours, and if and how SALEWA, DYNAFIT, Wild Country & LaMunt contributed to this. To date, the supplier has not responded to these questions.

Before the pandemic, the member planned to start a root cause project for reducing overtime. This was put on hold during the pandemic as the member believes that the factory closures would have led to uncommon data.

**Recommendation:** Fair Wear recommends that the member restarts the root cause project to reduce overtime. Instead of only following up via the CAP, the member could show the urgency of the audit finding by scheduling a call, going over the Fair Working Hours Guide, and identifying root causes and possible solutions. Even when overtime is not caused by SALEWA, DYNAFIT, Wild Country & LaMunt, the member could explore how to offer support.

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:** With half of its suppliers, SALEWA, DYNAFIT, Wild Country & LaMunt works with an extensive cost breakdown calculation per style, including estimated cost composition and workmanship costs. This is a requirement for new suppliers. The member hopes that it can convince some of the remaining suppliers to share more fact-based costing during visits.

The costing manager cross-checks the approximate labour costs (per style) given by the supplier with the garments' complexity, the standard allowed minutes, the factory's technical experience, and other specific features. The tool includes efficiency percentages of the different production countries in its calculation. The company checks with its suppliers whether these percentages are reasonable.

The tool includes the most recent living wage benchmarks, then calculated into living wage per minute. It allows SALEWA, DYNAFIT, Wild Country & LaMunt to check whether its pricing covers its share of the living wage. For countries with no living wage benchmarks, such as Italy, Portugal and Lithuania, the costing manager has included a target wage that seems high to be 'on the safe side'.

**Recommendation:** The member is recommended to involve worker representation in deciding target wages for Italy, Portugal and Lithuania.

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: An audit in November 2020 at a Bangladeshi supplier shared with two other Fair Wear members found that helpers were paid an apprenticeship wage. Even while this is not in breach of local legislation, it is considered an urgent finding since this wage is below the legal minimum wage. One of the other members was in the lead. The factory did not respond to the follow-up via the CAP. Ultimately, at the end of 2021, a Sumations audit was organised that confirmed the misuse of the apprenticeship scheme. Subsequently, a high-level meeting was organised with the supplier and each member's CSR and production departments. SALEWA, DYNAFIT, Wild Country & LaMunt could show documentation that the supplier corrected the helpers' wages, but another audit will verify this.

Another unresolved issue from the previous performance check was workers not being paid during the eight-day closure of a Chinese supplier in February 2020. SALEWA, DYNAFIT, Wild Country & LaMunt has been emailing the supplier throughout 2021 to get an answer. Finally, the factory replied that a bonus was paid instead, but it is unclear whether that suffices. To get more clarity, another audit will be scheduled.

The member's Vietnamese suppliers had to close for several months in the summer of 2021. SALEWA, DYNAFIT, Wild Country & LaMunt reached out to its suppliers, gathering information with a detailed questionnaire (see indicator 1.4). It checked that workers received all the needed information to apply for government subsidies. The member knows per month what amount workers received in total and checked that this followed local regulations. However, this was less than the legal minimum wage, and some months not even half of it. SALEWA, DYNAFIT, Wild Country & LaMunt has offered financial support. None of the suppliers has taken the member up on it, as they feel there is no problem because they followed governmental regulations. The member contacted Fair Wear to verify the received data and will start planning audits in spring 2022, as earlier was not possible. When data is verified the member can conclude its follow-up.

**Requirement:** The member is required to collaborate with its Vietnamese suppliers and find a solution for the workers who did not receive legal minimum wage during the months of lockdown.

**Recommendation:** When following up on urgent findings via email or CAP exchange stalls, Fair Wear strongly recommends the member to escalate and schedule a high-level meeting sooner.

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:** SALEWA, DYNAFIT, Wild Country & LaMunt pays suppliers once orders leave the harbour. During the pandemic, it was very clear to the member that no payments would be postponed. No supplier requested earlier payment.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** SALEWA, DYNAFIT, Wild Country & LaMunt continues to systematically assess wage levels in its production locations. The brand collected data on the wages paid by their suppliers in order to have an overall picture and calculated the total salaries in regular, benefit and overtime incomes for lower-paid, mode and higher-paid workers. The overview of the wages paid to workers was compared with several living wage benchmarks, the minimum wage, the trade union demand, and the local stakeholder demand.

**Recommendation:** Fair Wear encourages SALEWA, DYNAFIT, Wild Country & LaMunt to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

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:** While in 2020, SALEWA, DYNAFIT, Wild Country & LaMunt set the target wage 20% above the legal minimum wage, in 2021 the member decided to raise the target wage to 130% of the legal minimum wage. The goal is to pay the target wage to each worker across all suppliers. To make this possible, the member expects to increase retail prices.

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.	52%	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.	4	6	0

**Comment:** The living wage analysis of SALEWA, DYNAFIT, Wild Country & LaMunt shows that the brand has achieved its target wage (legal minimum wage + 30%) at 17 suppliers. These suppliers make up 52% of the total production volume in high risk countries for which there is detailed wage information.

**Recommendation:** This target wage is the first step and the member is recommended to continue increasing wages, especially where there is a large gap between the target wage and the living wage benchmark.

## **Purchasing Practices**

**Possible Points: 52** 

**Earned Points: 38** 

# 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	75 <sup>%</sup>	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	4%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check		
Total monitoring threshold:	79%	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:** The CSR team is responsible to follow up on problems identified by monitoring systems.

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:** SALEWA, DYNAFIT, Wild Country & LaMunt shares audit reports and CAPs with factory management and worker representation, where applicable, either in person or via email. The member tries to ensure that worker representatives are included in the audit opening and exit meeting. Timelines are discussed and jointly agreed upon.

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.	Basic	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.	4	8	-2

**Comment:** SALEWA, DYNAFIT, Wild Country & LaMunt has continued its efforts to address CAPs and the progress made at its suppliers. This effort is evaluated and included in the supplier evaluation, see also indicator 1.5. In general, the CSR team prepares and debriefs the management or staff member visiting suppliers on the key issues to address/check. The CSR team collects CAPs updates twice a year in May/October and for more urgent findings has email contact throughout the year. There is no documented overview of resolved and open findings at all suppliers, which makes it difficult to keep track of what is resolved at each supplier.

During the Brand Performance Check, follow-up on corrective action plans in Fair Wear audit reports was verified randomly. For the 2021 audit of a Chinese supplier, the company could show that several issues were resolved by the factory. The company plans to verify the management's response with another audit in 2022. SALEWA, DYNAFIT, Wild Country & LaMunt did not know the status of remediation after an external audit from 2020 at another Chinese supplier. The member later confirmed that some evidence of remediation was received, but other issues are still open. It will plan a Fair Wear audit in 2022. A BSCI audit of 2020 at a supplier in Myanmar showed excessive overtime. At the time of production the brand bought one fifth of the factory's total production. The member evaluated internally and sent the CAP back with a question for the supplier on the root cause of this overtime, but to date has not received a response back.

A 2020 audit at a Bangladeshi supplier had several concerning findings. With another Fair Wear member in the lead, it was decided to organise a Sumations audit end of 2021. This audit found even more serious findings. To show the seriousness of the audit outcome the brands organised a call with their production staff and the supplier in the same week of the audit exit meeting.

CAP issues are only closed after verification of remediation. SALEWA relies on CAP exchange for follow-up on findings, and progress on many findings is limited.

**Recommendation:** Fair Wear strongly recommends the member to make an overview of the resolved and open CAP findings of all suppliers to keep track of all issues. Where audits show urgent results, Fair Wear recommends taking more action sooner. The member could introduce a system that categorises findings with the follow-up required from headquarters and locally based to clarify when more is needed than sending emails. When excessive overtime is found at a supplier where the member has considerable leverage, it is recommended to discuss root causes and potential solutions in a call instead of relying on CAP exchange. The Fair Working Hours Guide can be of help.

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.	91%	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.	4	4	O

**Comment:** Despite the pandemic, the member was able to visit most of its factories via its local Quality Controllers, covering 91% of its total FOB 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: In 2021, SALEWA, DYNAFIT, Wild Country & LaMunt collected nine reports. Quality was assessed by looking at wage information and working hours information, health and safety findings. If a report does not have a CAP, the member will create one to ease follow up.

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.	4	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Intermediate			3	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	Advanced			6	6	-2

#### **Comment:** Bangladesh:

SALEWA, DYNAFIT & Wild Country only sources from factories covered under Accord monitoring and has informed its agent this is a strict requirement when proposing new suppliers. Since Bangladesh is considered a strategic country, the member decided to join the Accord in 2022. The brand is well informed about high risks, and three suppliers have been audited. The fourth supplier added in 2019 did not have an external audit report but was visited in 2021. The member has stopped with this supplier since. One audit shows concerning findings, including abusive language. The member has not yet enrolled the supplier in training to address this but is now considering the next steps.

#### Myanmar:

In 2021 SALEWA, DYNAFIT, Wild Country & LaMunt increased its orders and production lines at its two suppliers in Myanmar. From the start of the coup, the member mailed its production locations frequently to ask about the situation. The company emphasised that workers should be able to take unpaid leave during this strenuous time and should not be punished for attending demonstrations. When there were problems with bank payments in February, it reached out to ensure workers received their February wages. SALEWA, DYNAFIT, Wild Country & LaMunt checked attendance records for any irregularities, and the local Quality Controller checked with factory management in Myanmar and Taiwan. The member participates in the Myanmar Centre for Responsible Business Conduct, which cooperates with global and local unions to assess and strengthen workers' rights by training worker representatives and committees.

#### Turkey:

In 2021 the member started sourcing again in Turkey. The member followed the onboarding process described in indicator 1.4 and visited the production location and printing subcontractor. The operations director informed the supplier about the Syrian refugees' policy. The supplier is currently not working with Syrian refugees.

#### Other risks:

China and Vietnam are essential sourcing countries for the member, with 15 and 30% of its total production volume sourced there. One of the specific risks in these countries is the limited social dialogue. Therefore the member started gathering more detailed information on the existence and functioning of worker representatives in its suppliers. It has not enrolled its suppliers yet in transformative training programmes to strengthen the role of worker representatives. Excessive overtime is primarily addressed via CAPs. The member hopes that extending its lead times (see indicator 1.6) can reduce excessive overtime. SALEWA, DYNAFIT, Wild Country & LaMunt participated in an external screening to identify risks of bonded labour in its Chinese supply chain. Two Chinese suppliers came up as having a medium risk of participating in bonded labour of migrant workers. Following Fair Wear's advice not to discuss this with the factory, the company tries to keep an eye out for migrant workers during visits of its QC.

While SALEWA, DYNAFIT, Wild Country & LaMunt is exiting India as a production country, there was still one supplier active for the company in India. The member asked which spinning mills were used to ensure it was not a mill mentioned in the SOMO report on Sumangali. SALEWA, DYNAFIT, Wild Country & LaMunt has one supplier in Taiwan that falls within the scope of FW membership. The member continued its work regarding migrant workers and organised a peer-to-peer learning session where one supplier shared its good recruitment practices with the other suppliers.

The most important pandemic-related risk was the payment of wages during the lockdown in Vietnam. This is described under indicators 1.4 and 1.9.

**Recommendation:** SALEWA, DYNAFIT, Wild Country & LaMunt is advised to enrol its suppliers in Bangladesh in training targeting gender-based violence. Fair Wear also recommends the member to discuss the Fair Working Hours guide with its suppliers specifically in China and Vietnam, and enrol its strategic partners in training aimed at strengthening worker representatives.

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:** The member actively cooperates in follow up of a CAP at a shared Bangladeshi supplier.

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:** The member visits the low risk countries regularly and during the visit an internal check is conducted that includes 150 detailed questions related to CoLP compliance, and the suppliers' capacity is checked.

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

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	O

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	0

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has one licensee in China and one in South Korea. The brand has sent and received the questionnaire, and both licensees have provided information on the production locations they use. SALEWA, DYNAFIT, Wild Country & LaMunt's license contract includes minimum requirements on Social Compliancy. Licensees need to adhere to the member's Code of Conduct and commit to its implementation in the factories where they make their products

# **Monitoring and Remediation**

**Possible Points: 31** 

**Earned Points: 25** 

# 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.	3	
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:** The CSR team is responsible for addressing worker complaints.

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

**Comment:** SALEWA, DYNAFIT, Wild Country & LaMunt has a system in place to check the Fair Wear Worker Information Sheet (WIS) has been visibly posted at all production locations and could show that this was done for all new production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021. In 2019 three suppliers were enrolled in the Fair Wear Workplace Education Programme, covering 5 % of the total FOB in high-risk countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	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.	3	6	-2

Comment: In August 2021, a worker filed a complaint against a Vietnamese supplier about not receiving wages during closure. Workers were worried about if and when they would receive money. The company responded by requesting clarification from the supplier and the complainant could later confirm that the workers received money, though it remained unclear to them whether it was paid by the factory or the local government. As mentioned under indicator 1.9 the amounts received were below the legal minimum wage. An audit planned for 2022 will verify wage documentation so that the SALEWA, DYNAFIT, Wild Country & LaMunt can take an informed decision regarding remediation.

**Recommendation:** Fair Wear recommends the member to involve worker representation when discussing with the supplier how to make back payments possible.

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

# **Complaints Handling**

**Possible Points: 9** 

**Earned Points: 6** 

## 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:** SALEWA, DYNAFIT, Wild Country & LaMunt organizes a Retail Academy - a biannual session with retail staff to educate them about products, the company mission and values, and sustainability activities. This has been conducted online in 2021. All new employees receive an introduction to the importance of Social Compliance for the company.

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

**Comment:** All staff in direct contact with suppliers, including sourcing and production managers and quality control specialists are informed of FWF requirements and are in regular communication with the CSR team. In 2021, two new people joined the Footwear and Equipment division in Purchasing and Planning. As both will have close relations with suppliers, the member gave them special training, informing them about general guidelines and specific actions and projects in place.

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:** In the cases where SALEWA, DYNAFIT, Wild Country & LaMunt does not have direct contact with a factory but instead communicate via an agent or intermediary, it is the agent's or intermediary's responsibility to ensure compliance to the social standards and follow up on CAPs and complaints. Therefore the member has established a structured due diligence procedure that the agents must follow.

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

# **Training and Capacity Building**

**Possible Points: 5** 

**Earned Points: 5** 

## **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: SALEWA, DYNAFIT, Wild Country & LaMunt checks all production locations prior to production, and during production staff often visit the sites to collect information on production locations and monitor production per style and per production step. The member keeps a well-documented and up-to-date supplier register which includes detailed information on all production locations, including addresses, subcontractors, number of employees and current CAP status. The member knows the non-CMT locations but these are not yet added to the Fair Wear database. The CoC that is part of the contract states that subcontracting is only allowed with prior approval from the company and that suppliers should continuously monitor their subcontractors.

**Recommendation:** Fair Wear strongly recommends the member to upload all non-CMT locations in the internal database.

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:** The CSR team works closely together with the production and costing staff and the quality control teams. They meet face to face and online regularly and information about working conditions at production sites is accessible to all.

# **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:** SALEWA, DYNAFIT, Wild Country & LaMunt complies with the FW Communications Policy. The FW membership is communicated on hangtags, bags, in-store on plaques and displays, in consumer brochures and online communications.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	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.	1	2	0

**Comment:** SALEWA, DYNAFIT, Wild Country & LaMunt's website links to their latest FW Brand Performance Check report. SALEWA, DYNAFIT, Wild Country & LaMunt publishes the names of their suppliers per product on an interactive website and gives more information when asked. The member has disclosed o% of production locations to other members in Fair Force and on the Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF 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:** The social report has been approved and is published on the member's website.

# **Transparency**

**Possible Points: 6** 

**Earned Points: 5** 

### 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The Sustainability Manager is part of the management team, therefore the CSR team is closely linked to top management. This includes bimonthly updates on sustainability topics including Fair Wear membership. Membership is frequently evaluated, all the more in light of new policies such as the transparency policy and planned changes to the performance check system.

After the performance check, CSR and top management meet to discuss how to follow up the results.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	50%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

**Comment:** The member had requirements for auditing tail-end locations in Bangladesh and for indicators 1.9 and 6.2. As SALEWA, DYNAFIT, Wild Country & LaMunt left the Bangladeshi tail-end location, the first requirement is no longer relevant. The member could show sufficient action on the requirement for indicator 1.9. The requirement to disclose suppliers in the internal Fair Wear system and on the website remains open.

## **Evaluation**

**Possible Points: 6** 

**Earned Points: 6** 

#### **Recommendations to Fair Wear**

SALEWA, DYNAFIT, Wild Country & LaMunt urges Fair Wear to re-evaluate its transparency policy, considering the risks for smaller members and the desired achievements. The timing of emails about participating in campaigns can be improved. Communication about complaints should be quicker. More practical training on risk-based policy, now the training was not useful to where the member is at the moment. Fair Wear should provide more practical guidance on Vietnam and brainstorm potential solutions before the performance heck. Fair Wear should cooperate with NGOs and campaigning organisations in order to avoid members being requested to fill in extensive questionnaires individually. Make more monitoring visits with a specific focus possible, to verify results from external audit reports.

# **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	38	52
Monitoring and Remediation	25	31
Complaints Handling	6	9
Training and Capacity Building	5	5
Information Management	7	7
Transparency	5	6
Evaluation	6	6
Totals:	92	116

Benchmarking Score (earned points divided by possible points)

79

Performance Benchmarking Category

Leader

### **Brand Performance Check details**

Date of Brand Performance Check:

07-03-2022

Conducted by:

Niki Janssen

Interviews with:

Alexandra Letts, Sustainability Manager
Martine Riblan, Sustainability Specialist
Francesco Sineri, Operations Director Apparel
Sofia Benedetti, Quality Control Specialist
Kai Blessenohl, Costing Manager
Ruth Oberrauch, Head of Sustainability and on behalf of the ownership/CEO