



Brand Performance Check

Icebug AB

This report covers the evaluation period 01-03-2021 to 28-02-2022

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

Brand Performance Check Overview

Icebug AB

Evaluation Period: 01-03-2021 to 28-02-2022

Member company information	
Headquarters:	Jonsered , Sweden
Member since:	2021-01-01
Product types:	Outdoor products; Accessories; Footwear
Production in countries where Fair Wear is active:	China, Vietnam
Production in other countries:	Sweden
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	44%
Benchmarking score	47
Category	Good

Summary:

Icebug AB has met most of the Fair Wear requirements, with a score of 47 points, the brand is awarded the 'Good' category in its first year of membership. The company monitored 44% of its production volume.

Corona Addendum:

Icebug AB became a Fair Wear member in 2021. Its financial year is from March 2021 to February 2022. Icebug mainly sells outdoor shoes through its webshop and retail shops. In 2021, COVID-19 still seriously impacted the member's supply chain. Nevertheless, Icebug has had a stable financial year, and sales have increased.

In its first year of Fair Wear membership, Icebug focused on building long-term trusting business relationships with its production locations and informed all production locations about the membership. Icebug used its first year of membership to understand better what it entails and get to know some initial processes. The member brand has not yet identified the main human rights risk related to its production countries and locations.

Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. The team from Taiwan, therefore, visits the factories regularly to carry out quality controls and check production. In addition, an Icebug-employed sourcing expert and quality controller in China conducts regular on-site inspections at the factories.

With 99% of its total FOB placed in Vietnam, Icebug's production planning was impacted during the lockdowns in the country between July and October. Icebug did not cancel any orders. The member offered flexibility by extending lead times. With another Fair Wear member brand, Icebug collected detailed (wage) information about the situation in one factory. The other factory was supported by Icebug financially with extra payments for workers' wages and additional COVID-19-related costs in relation to its leverage.

Icebug is a small company, which means information is easily shared. All people in direct contact with production locations know Fair Wear's requirements and are updated on the production locations' labour conditions. Fair Wear recommends that Icebug also ensure that information on processes and progress is stored to ensure continuity in its approach to improving labour conditions. 2021 was a year for Icebug to learn what it means to be a Fair Wear member. The company now has to use the learnings to take the following steps and show gradual improvements.

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.	54%	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: Icebug has a small supplier base. Most of the products are sourced from Vietnam and China. Icebug buys 54% of its production volume from production locations where it buys at least 10% of production capacity.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	2%	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: Icebug focuses on three key assembly suppliers in Vietnam for its shoe production. Icebug sources specific components, such as outsoles or midsoles, from suppliers with whom the member brand has a direct business relationship. For this reason, 2% of the company's FOB comes from production locations where it buys less than 2% of its total FOB. Icebug sources specific components, such as outsoles or insoles of the shoes, from suppliers with a direct business relationship.

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.	100%	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: Icebug has a strategy of working with suppliers for the long term due to the special quality requirements of outdoor shoes. This has resulted in 100% of FOB being produced at production locations where a business relationship has existed for over five years.

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

Comment: As 2021/2022 was Icebug's first year of membership, the company collected the Fair Wear questionnaire from all its production locations.

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: Icebug's sourcing strategy is primarily based on building long-term relationships based on trust with a small number of suppliers. The member brand communicates to all production locations that it expects adherence to the Fair Wear Code of Labour Practices. Icebug refers for its risk analysis mainly to the admittance of Fair Wear membership and the guidelines and Fair Wear country studies available there. Vietnam is the most important sourcing country for Icebug, with 99% of the member's FOB. Icebug produces 0.4% of its total FOB in China.

Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. The team from Taiwan, therefore, visit the factories regularly to carry out quality controls and check production. In addition, an Icebug-employed sourcing expert and quality controller in China conducts regular on-site inspections at the factories. The production team in Sweden has frequent exchanges with them. When possible, all suppliers are regularly visited by the Head of Production before placing the order to understand the setup of the production locations and ensure there are no obvious human rights violations. In 2021, it was impossible to visit the factories, especially in Vietnam, due to COVID-19.

Icebug does not have a structured due diligence process to take country risks into account in its communication with production locations. Nevertheless, the impact of COVID-19 was discussed with the production locations, especially in Vietnam. In 2021, due to COVID-19, the government in Vietnam decided on a strict lockdown. Factories in the high-risk provinces were requested to work under the 3-on-site policy (which meant that workers temporarily lived within the factory premises and could not go home) or otherwise had to close temporarily. Icebug identified the main risks for workers were non-payment of wages and keeping in close contact with the suppliers and cross-checked the situation in cooperation with another Fair Wear member brand. One factory was closed for two weeks, and one supplier for almost more than three months and also partly worked under the 3-on-site-policy. The other factory where Icebug produces is located in the north of Vietnam and was not affected by the lockdown. See for more information indicator 1.9.

Requirement: A formal process should exist to evaluate the risks of labour violations in the production areas Icebug is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

Recommendation: It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

Icebug should evaluate whether the high risks of sourcing in China and the required engagement in due diligence in this regard are appropriate to China's importance (0,4% FOB) to the company.

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	0

Comment: Icebug has invested time into building relationships with the production location. This process has always been based on a continuous evaluation of the relationship, focused on product quality, costs, delivery and performance. The company is small, and information on suppliers is regularly shared between different people and departments. Icebug also uses Trustrace, a transparency tool for product traceability, to evaluate products according to ecological aspects. But the supplier evaluation does not include criteria for compliance with the Code of Labour Practices.

Recommendation: Icebug AB is encouraged to make more explicit how social compliance in the supplier evaluation system in which quality, costs and planning are assessed is weighted and how compliance with CoLP leads to production decisions. A good basis for this is the data from monitoring audits and on-site visits.

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

Comment: Icebug's production planning is based on two seasons: spring/summer and fall/winter. Here the product development starts about two years before the first order is placed. On average, the production process requires two sampling rounds also to prevent the need to re-produce the products due to quality defects. Icebug forecasts eight months in advance and places the order six or four months before the start of the season and the start of sales. Mainly the order placement shows less volume than the forecast. During production, there is an excel-sheet based system to track the process. Icebug sells its products in its online shop as well as through retailers. The B2B business with the retailers is important for Icebug and is relevant to define the production volume and quantities.

In 2021, Icebug started already to focus less on retail seasons. The member brand wants to sell more products through its online shop, which makes launching new products more flexible. However, most of Icebug's production volume remains carry-over products that have been produced over many years. Icebug has about 10% of the products in stock as buffer capacity, for example, to react to sold-out products in retail. The member brand does not produce ad-hoc or spontaneous customer requests.

Icebug's agent in Taiwan (and shareholder) and Icebug's employees in China are closely involved in the sourcing process and sampling process and, therefore, in close contact with the factories in Vietnam and the office in Sweden. Icebug partially nominates materials and buys outsoles and midsoles directly from the suppliers. Nevertheless, the member brand always buys ready-made garments (FOB) from its four main suppliers.

Icebug does not know the production capacity of its production locations. Its order volume is relatively stable and the member asks its production locations to set the deadlines. The company expects its planning process supports reasonable working hours.

Recommendation: Fair Wear recommends including the production capacity of the factory to establish a strong planning system to support reasonable working hours.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	0	6	0

Comment: Icebug did not conduct monitoring audits in 2021 and therefore has no data for its main suppliers related to excessive overtime. Due to COVID-19, it was not possible to visit the factories in Vietnam. Icebug partially collected other (external) audit reports but did not analyse them or derive any actions from them.

A Fair Wear monitoring audit took place in 2019 at a supplier in China. This audit indicated excessive overtime. At that time, Icebug was not a Fair Wear member. The audit results were followed up by another Fair Wear brand, which also took the lead in the tracking and root cause analysis of excessive overtime. The leverage from Icebug in this factory is small, and bigger brands are also sourcing from that factory.

Requirement: Icebug should investigate to what extent its current buying practices have an effect on the working hours at the supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime.

Recommendation: Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Icebug actively take measures when excessive overtime is found. Taking measures to ensure that Icebug knows and shows whether excessive overtime takes place at a supplier is key to resolving the issue.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

Comment: After developing a new product, Icebug sends target prices to the supplier. This price is based on the first samples, suggested retail prices, as well as prices of similar products. The member brand asks the supplier to complete a detailed costing sheet to overview the cost breakdown. Icebug uses open costing for almost all styles. The costing sheet shows costs for fabric, lining, outsoles, packaging, labour costs, factory profit margin, and overhead costs. Icebug does not negotiate the set prices from the supplier.

The member brand does know the percentage and amount of labour costs included in the calculated FOB price. Icebug also has a rough overview of wages in the factories so that the member brand can link its price to the labour costs to check if it covers minimum wages at least. However, Icebug cannot create a direct link from its share of paid FOB prices to the wages paid to the workers.

Recommendation: Icebug is encouraged to provide buyers (or other employees involved in fixing prices with suppliers) and suppliers training on cost breakdown, for example using the FairPrice app.

The level of transparency in open costing can vary from disclosing only the total cost of working minutes to detailed work plans discussed with the buyer on manufacturing process steps, and related efficiency factors.

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: During the lockdown in Vietnam, Icebug and other Fair Wear member brands identified a high risk for payment below the legal minimum wage. Government regulations required factories to continue the payment of wages for the first two weeks of closure in July. Icebug was in close contact with the suppliers in Vietnam. One factory, where Icebug produces, was closed for two weeks and one supplier for almost more than three months and also partly worked under the 3-on-site-policy.

To overview the situation for the one supplier that was in lockdown for two weeks in July 2021, Icebug collaborated with another member sourcing from Vietnam. With the collected data, Icebug and the other Fair Wear member brand shared an overview showing that at least the legal minimum wages were paid. Nevertheless, Icebug and the other Fair Wear member brand offered financial support, which the supplier refused. Both members requested a Fair Wear monitoring audit for 2022 to verify the paid wages in the factory. When data is verified, the member can conclude its follow-up.

With its main supplier in Vietnam, responsible for 54% of Icebug's total FOB, the member brand was in close contact during the three months of the lockdown period and 3-on-site-policy. Icebug offered financial support to cover wages for suspended workers during the lockdown. For this reason, Icebug paid 86,000 USD for workers' wages and other COVID-19-related costs in relation to its leverage of 25%. The costs covered the expenses for the 3-on-sites workers and included 14 days' salary for workers that did not work under the 3-on-site policy. Icebug has requested a Fair Wear monitoring audit for the next financial year to verify the payment of wages.

In China, the government tightened the COVID-19 regulations at the end of February 2022, resulting that many factories in specific areas had to shut down. As this has affected the last month of Icebug's financial year, this needs to be verified in the next BPC.

Recommendation: Fair Wear strongly recommends that Icebug verifies whether legal minimum wage issues in China have been paid during the COVID-19 situation at the beginning of 2022.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

Comment: No evidence of late payments to suppliers by Icebug was found. Icebug's payment terms with suppliers are to pay the invoices 60 to 90 days after the proof of shipment is provided. For two suppliers in Vietnam, the agent (and shareholder) in Taiwan is responsible for the payment. However, Icebug has granted a credit here as a buffer and for pre-financing.

Recommendation: Fair Wear recommends having a written contract with the suppliers regarding the payment terms.

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: Icebug already started analysing the wage levels of its main three suppliers before becoming a Fair Wear member. The basis for Icebug's analysis was mainly external audit reports or self-assessments from the suppliers. The overview shows the average wages without overtime (with bonuses). As a comparative value, Icebug uses the Anker benchmark (Global Living Wage Coalition) for the respective regions in Vietnam. The overview shows the average values of the lowest wages as well as the highest-paid wages. Most of the wage data and the comparative data are from 2019. This overview shows that most suppliers pay the estimated Living Wage of the Anker benchmark 2019 of the Global Living Wage Coalition. The brand has not yet discussed the root causes of living wages in detail with its suppliers, such as low prices, productivity issues, etc.

Requirement: Icebug must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. The Fair Wear wage ladder can be used as a tool to implement living wages, and to document, monitor, negotiate and evaluate the improvements at its suppliers.

Recommendation: Fair Wear encourages Icebug to discuss different strategies to work towards higher wages with suppliers. It is advised to start with suppliers where the member is responsible for a large percentage of production and long-term business relationship. Fair Wear also highly recommends Icebug get more recent information about wage levels in its factories as inflation has increased since 2019.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

Comment: Icebug already has an overview of the wage levels in its main factories and wants to use this to build a strategy on and set a target wage. Nevertheless, in 2021, Icebug has not determined and financed wage increases.

Recommendation: Icebug should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models. In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

Comment: As Icebug has not yet set target wages with its suppliers, no points at this indicator can be awarded.

Purchasing Practices

Possible Points: 52

Earned Points: 22

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	44%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	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:	44%	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: In 2021/2022, one person from the Development & Production Team was responsible for following up on problems identified by the monitoring system.

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

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

Comment: No Fair Wear monitoring audit took place in Icebug's first year of Fair Wear membership (March 2021/February 2022). An external audit took place at one of Icebug's suppliers in Vietnam, which was conducted by another Fair Wear member. Icebug was in communication with the Fair Wear member to ensure that the Corrective Action Plan (CAP) and Audit Report were shared with the factory, as the other Fair Wear member took the lead in following up on the audit findings.

Recommendation: Before an audit takes place, Icebug is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports 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.	Insufficient	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	-2	8	-2

Comment: No Fair Wear monitoring audit took place in Icebug's first year of Fair Wear membership (March 2021/February 2022). An external audit took place at one of Icebug's suppliers in Vietnam, conducted by another Fair Wear member, who took the lead in following up on the Corrective Action Plan. Icebug was in contact with the Fair Wear member brand but was not closely involved in the process. The CAP shows open points on health and safety issues. It also shows that workers are not covered by any insurance during the probation period. Icebug has not followed up on external audits collected in 2021 and the beginning of 2022 and could not share information about the status of the CAPs.

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

Recommendation: For Icebug's following financial year, it is recommended to set up a systemic approach to ensure the follow-up of the Corrective Action Plans with set deadlines, together with the supplier and the worker representatives. It is also recommended that Icebug provides training to its employees in China to work on improvements of the CAP on-site.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

Comment: As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

Comment: Icebug has collected external audit reports for some of its production locations. The company has not assessed the quality or followed up on results.

Recommendation: Existing reports form a basis for understanding the issues and strengths of a supplier and reduce double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the Fair Wear audit quality tool and corrective actions are implemented.

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	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: In the first year of membership, the company was focused on learning and understanding the human rights situation in specific production locations. The company has not yet systematically identified country-specific risks for its assembly (Tier 1) suppliers in the production countries or developed processes to prevent and mitigate possible risks.

Other risks:

China:

In 2021, 0,4% of its production was sourced from China. Icebug sees forced labour and the lack of collective bargaining as high risk in China. Since they haven't conducted monitoring audits yet, the member brand couldn't verify the risk.

Vietnam:

In 2021, 99% of its production was sourced from Vietnam. During the lockdown in Vietnam, Icebug and other Fair Wear member brands identified a high risk for payment below the legal minimum wage. For more information on how Icebug followed this up, see indicator 1.9. Beyond that, Icebug has not requested more information about the 3-on-site situation in the factories, for example, to ensure that women workers felt safe during this period.

COVID-19:

In 2021, Icebug took other measures to monitor the COVID-19 situation in the factories when it could not conduct many Fair Wear monitoring audits at its suppliers. Icebug maintains a regular conversation about the situation at its main suppliers in Vietnam. The factories showed that they had taken measures to prevent COVID-19 or to align with government regulations. In particular, Icebug has made additional measures to pay minimum wages and followed up on COVID-19-related challenges (see also Indicator 1.9).

Requirement: Icebug's monitoring system should identify and address high-risk issues specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. These policies guide priorities in remediation efforts.

Recommendation: We ask Icebug to make a clear statement to its suppliers that, as a company, it does not want to be involved with any forced labour in its supply chains, including subcontractors. We advise Icebug to add the risk of forced labour to its risk assessments. Even though Icebug only sources 0,4% of its total FOB in China, it is important to verify the high risk at its supplier with additional monitoring activities.

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: Two of Icebug's production locations are shared with other Fair Wear members. These production locations had audits before Icebug joined Fair Wear. However, the company has contacted the other members to learn about the remediation efforts.

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.: No (o)

Comment: 0,1% of Icebug's FOB is produced in Sweden. The company has received the signed questionnaire and proof of the posted Worker Information Sheet.

Recommendation: Fair Wear also recommends visiting this production and to fill in the Health and Safety Checklist and to get an impression of the situation of the production on site.

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	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

Monitoring and Remediation

Possible Points: 24

Earned Points: 8

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	

Comment: In 2021/2022, one person from the Development & Production Team was responsible to address 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: Icebug has collected proof of the posted Worker Information Sheet from its main suppliers. To ensure workers at Icebug's suppliers are aware of the Fair Wear complaint mechanism, the member brand has asked the factory to post the Worker Information Sheet visible to the workers in the production location. Nevertheless, the proof from the outsole suppliers is missing.

Requirement: Icebug must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. Icebug should check by means of a visit whether the Worker Information Sheet is posted in the factories.

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.

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

Complaints Handling

Possible Points: 3

Earned Points: 2

4. Training and Capacity Building

Comment: Icebug joined Fair Wear in 2021. Icebug holds a sales meeting with all employees twice a year. Here, the Fair Wear membership was presented to all employees and focus topics, e.g. the COVID-19 situation in Vietnam were highlighted. All new employees at Icebug also receive sustainability training, including a Fair Wear membership presentation.

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: Icebug is a small company where information about production location is regularly shared between all relevant staff and departments. Fair Wear requirements are included in these regular updates. Icebug's employees in China are also informed about the Fair Wear requirements.

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

Comment: Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. Icebug's agent (and shareholder) from Taiwan is informed about the Code of Labour Practices and is involved in implementing the Fair Wear requirements.

Recommendation: Fair Wear recommends the member actively train the agent on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

Comment: Because of travel restrictions in 2021 that limited the possibility 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: 3

5. Information Management

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

Comment: Icebug has had long business relationships with most of its production locations and has visited them all at least once. As such, the company is aware of all its production locations. Icebug's staff often travels to locations during production, enabling them to check if the factory's agreed production volumes are currently being produced. Icebug's employees from China and the agent's staff from Taiwan are regularly on-site at the factories to do quality checks. Before an order is placed, the production location is double-checked and added to the system with the help of the quality check report.

Recommendation: Fair Wear recommends having a written agreement with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

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: Icebug is a small company where information about production locations is regularly shared between the relevant staff and departments.

Information Management

Possible Points: 7

Earned Points: 4

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: Icebug communicates about Fair Wear on its website. The communication is in line with the Fair Wear communications policy.

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: Icebug has disclosed production locations. 100% of production volume is disclosed to other members in Fair Wear's internal database 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: Icebug submitted its social report to Fair Wear and published it on its website.

Transparency

Possible Points: 6

Earned Points: 6

7. Evaluation

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

Comment: Icebug's CEO is actively involved in all parts of the organisation, including Fair Wear membership. As 2021 was the first year of its membership, the organisation has not yet formally evaluated its membership.

Recommendation: Fair Wear advises Icebug to organise a meeting with management and sourcing staff to discuss the outcomes of this performance check and use those to formulate future plans.

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

Icebug is generally very satisfied with the cooperation with Fair Wear and emphasised that it appreciates the recommendations and knowledge. Icebug has noted that it feels that there are too many documents for the brand to work through, especially a lot of information during the first membership year. In addition, Icebug commented on the audit process in Vietnam that only the Asian Floor Wage is reported as a benchmark under the Wage Ladder (however, this already refers to the financial year starting March 2022).

Scoring Overview

Category	Earned	Possible
Purchasing Practices	22	52
Monitoring and Remediation	8	24
Complaints Handling	2	3
Training and Capacity Building	3	5
Information Management	4	7
Transparency	6	6
Evaluation	2	2
Totals:	47	99

Benchmarking Score (earned points divided by possible points)

47

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

05-10-2022

Conducted by:

Victoria Lauer

Interviews with:

Maria Munther (Sustainability Manager)

David Ekelund (CEO)

James Varkey (CFO)

Jerome Manceau (Head of Development & Production)

Sebastian Lundfall (Communication & Marketing)