



Brand Performance Check

FC St. Pauli Merchandising GmbH & Co. KG

This report covers the evaluation period 01-07-2021 to 30-06-2022

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

FC St. Pauli Merchandising GmbH & Co. KG

Evaluation Period: 01-07-2021 to 30-06-2022

Member company information	
Headquarters:	Hamburg , Germany
Member since:	2021-04-01
Product types:	Garments, clothing, fashion apparel; Sports & activewear; Accessories; Home textiles
Production in countries where Fair Wear is active:	China, India, Turkey
Production in other countries:	Germany, Greece, Poland and Portugal
Basic requirements	
Scoring overview	
% of own production under monitoring	13%
Benchmarking score	51
Category	Good

Summary:

FC St. Pauli Merchandising GmbH & Co. KG has met most of Fair Wear requirements, with a score of 51 points, the brand is awarded the 'Good' category in its first year of membership. The company monitored 13% of its production volume. After the first year of membership, the required percentage is 40% or more of FOB volume. Due to the COVID-19 pandemic, the monitoring threshold is not applicable for this Brand Performance Check.

Corona Addendum:

FC St. Pauli Merchandising is a wholly-owned subsidiary of the football club FC St. Pauli in Hamburg, Germany. As part of a referendum, the football club has set itself the goal of becoming the most sustainable football club in the Bundesliga in Germany. Since then, the company's motto has been: 'not perfect, but better'. The club and its subsidiary FC St. Pauli Merchandising, have been seriously engaged in sustainability-related activities. After adopting the new sustainability strategy at the beginning of 2021, the company also decided to become a member of Fair Wear in April 2021. With the help of Fair Wear Foundation, the strategy should be implemented step by step. It is also the FC St. Pauli Merchandising's goal to learn from other member brands.

In the first year of Fair Wear membership, FC St. Pauli Merchandising focused on collecting all relevant information and data about its supply chain to achieve more transparency. The main production locations were informed about Fair Wear membership. The member brand started building up its CAP follow-up by collecting and evaluating existing audit reports from the factories.

Regarding FC St. Pauli Merchandising's purchasing practices, agents play a central role. The member brand buys most of the merchandise products in small quantities, and the agents support purchasing larger quantities from the suppliers. In particular, one agent from Germany is responsible for buying the never-out-stock (NOS) articles, logistics and storage of the goods. The agents have direct communication with the suppliers. FC St. Pauli Merchandising has no direct contact with the factories.

In the last financial year, 2021/2022, FC St. Pauli Merchandising continued to report a rising turnover, despite the ongoing difficulties caused by the COVID-19 pandemic. The football club received a lot of solidarity from important partners, sponsors and its strong fan community. This was also due to the club's success in the Bundesliga last year. However, FC St. Pauli Merchandising identified some challenges in the supply chain due to COVID-19, especially regarding planning uncertainty and fluctuating prices. The company did not cancel any orders and accepted delays from suppliers.

Fair Wear encourages FC St. Pauli Merchandising to build a formal process to evaluate the risks of labour violations in the production areas FC St. Pauli Merchandising operates. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

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.	18%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	1	4	0

Comment: FC St. Pauli Merchandising sells a diverse range of fan merchandise and promotional wear. FC St. Pauli Merchandising runs two brands (skull & crossbones and DIIY), partly with a shared supplier base. The company buys 18% 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.	19%	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.	2	4	0

Comment: 19% of FC St. Pauli Merchandising's production volume comes from locations where it buys less than 2% of its total production volume. FC St. Pauli Merchandising produces a wide variety of products for its fanbase and therefore needs various suppliers for each product. The company is aware that a long 'tail-end' is not ideal when influencing suppliers' social standards. By joining the Fair Wear Foundation, the company has set the goal of developing a new sourcing strategy, which is not implemented yet. FC St. Pauli Merchandising's aim is to include a decision process about which suppliers are of strategic importance in regard to its sourcing strategy. In the first year of membership, the focus was on creating transparency in the supply chain and using data collection to gather the first substantial information about the supply chain.

Recommendation: Fair Wear recommends FC St. Pauli Merchandising to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, FC St. Pauli Merchandising 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. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	61%	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: FC St. Pauli Merchandising pursues the goal of establishing long-term supplier relationships. This has resulted in 61% 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: In total, the various products of FC St. Pauli Merchandising are produced in 30 assembly factories. Another 37 suppliers are intermediaries or subcontracts for supporting processes, such as embroidery or printing.

As 2021/2022 was FC St. Pauli Merchandising's first year of membership, the company collected the Fair Wear questionnaire (CoLP) from 24 of its production locations. However, the brand did not follow up on missing information or specific information, such as subcontracting partners given in the signed CoLP. For six factories, a signed questionnaire still needs to be collected. The reason for this is that in the past financial year, some products from the stock were sourced from suppliers, but no more production took place for FC St. Pauli Merchandising in that year. In addition, some German intermediaries and traders and all subcontractors for supporting processes have not signed the CoLP yet.

Requirement: FC St. Pauli Merchandising needs to ensure that new production locations sign and return the questionnaire before first orders are placed.

Recommendation: FC St. Pauli Merchandising should have all relevant questionnaires collected in the next financial year. Fair Wear also recommends that all subcontractors (supporting processes) also sign the questionnaire.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	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: FC St. Pauli Merchandising's sourcing strategy is primarily based on its relationship with the agents and intermediaries. The agents are the executing element for the company and communicate directly with the suppliers. Since sustainability and social responsibility, in general, are important to the overall strategy for the football club and FC St. Pauli Merchandising, the cooperation of the agents was carefully selected (see more information in indicator 4.3). Together with its agents, FC St. Pauli Merchandising collects data from external audit reports to identify factory-based risks. The company mainly uses the Global Organic Textile Standard (GOTS) certification for product-based risk analysis. It communicates to all production locations that it expects adherence to the Fair Wear CoLP. Turkey is the most important sourcing country for FC St. Pauli Merchandising, with 35% of the member's FOB. 23% of its total FOB is sourced from India, 14% from Portugal and 11% from China. Other production countries are Poland, Greece and Germany. FC St. Pauli Merchandising does not have a structured due diligence process to take country risks into account in its communication with production locations. Nevertheless, FC St. Pauli is aware of the general risks in the production countries.

When selecting new suppliers, the brand discusses human rights and Fair Wear requirements with its agents. FC St. Pauli Merchandising has the long-term goal of stabilising its own supplier portfolio and only onboarding new suppliers under certain circumstances. For example, it may happen that new suppliers have to be onboarded, as FC St. Pauli Merchandising mainly produces small quantities, and not all suppliers accept this. There is no structured and internally agreed on onboarding process for new suppliers in place yet.

With the main production locations, the company discussed the possible impact of COVID-19, especially related to production planning and shipping.

Requirement: A formal process should exist to evaluate the risks of labour violations in the production areas FC St. Pauli Merchandising 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: Risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends FC St. Pauli Merchandising to clearly define preventive actions for identified risks and connect them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence. Fair Wear advises to use information from Fair Wear country studies and wage ladders and use the Fair Wear Health and Safety guidelines. FC St. Pauli Merchandising can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potentially new) sourcing countries. For gender risk assessments, FC St. Pauli Merchandising can use the gender toolkit with fact sheets per country, supplier checklists and a model policy on Sexual Harassment. FC St. Pauli Merchandising can cooperate with local stakeholders to further investigate the situation in a specific country. Fair Wear can offer information on local stakeholders.

Furthermore, Fair Wear strongly recommends FC St. Pauli Merchandising closely involve the agents in the risk analysis.

It is also advised to describe the onboarding process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with relevant staff.

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: FC St. Pauli Merchandising invested time into building relationships with the production location. This process has always been based on a continuous evaluation of the relationship in close cooperation with the agents. The company is small, and information on suppliers is regularly shared between different employees and departments. Supplier evaluation is not embedded in a systematic process, nor does it include compliance with the Code of Labour Practices.

Requirement: A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that FC St. Pauli Merchandising consistently evaluates the entire supplier base and includes information into decision-making procedures.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	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: FC St. Pauli Merchandising's production planning is not driven by the retail season but is focused on the FC St. Pauli football club and football seasons. Although FC St. Pauli Merchandising sells merchandise products for summer or winter, the quantities or collections are also based on the German Bundesliga and are mainly driven by the club's success. FC St. Pauli Merchandising sells fan articles in its online shop, in two of its own retail stores in Hamburg and to other retail partners. The production planning at FC St. Pauli Merchandising is divided into two brands: 'skull & crossbones' and 'DIY'.

Skull & crossbones:

Around 70% of this brand's productions are 'never-out-of-stock products (NOS). This promotional wear is mainly ordered from the German agent. FC St. Pauli Merchandising has insights into the stock of the agent who stores the goods. FC St. Pauli Merchandising orders an annual or biannual forecast quantity of the products stored at the agent. FC St. Pauli Merchandising then regularly obtains smaller quantities, depending on the sales of the merchandise products. Only at this point, the agent invoices FC St. Pauli Merchandising. Thus, the agent makes advance payment for the goods in general. Because FC St. Pauli Merchandising works mainly with a finishing company in Germany, designs can be printed or embroidered here at short notice without affecting production at the factories. The seasonal merchandise of 'skull & crossbones' runs through direct importers, similar to the products of the 'DIY'-brand. This is around 30% of the brand's production.

DIY:

The 'DIY'-products are ordered through an agent in Turkey. Also, the football team's jerseys are developed by FC St. Pauli Merchandising itself. The product development of the 'DIY'-products starts about 1,5 years before the sales start. FC St. Pauli Merchandising forecasts twelve to eight months in advance and places the order nine or seven months before the start of the season and the start of sales. In most cases, there are no short-term changes. However, if that should happen, FC St. Pauli Merchandising accepts longer delivery times. Since FC St. Pauli Merchandising usually only produces small quantities, the member brand is dependent on the capacity planning of the suppliers. FC St. Pauli Merchandising does not know the production capacity of its production locations as the production locations set the deadlines. FC St. Pauli Merchandising also accepts goods with quality defects to prevent new production. The quality check is already done on-site by the agent.

COVID-19 did not significantly impact FC St. Pauli Merchandising's supply chain in the past financial year 2021/2022. However, FC St. Pauli Merchandising identified some challenges in the supply chain due to COVID-19, especially regarding planning uncertainty and fluctuating prices. The company did not cancel any orders and accepted delays from suppliers.

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: FC St. Pauli Merchandising did not conduct any Fair Wear audits in the first membership year 2021/2022. However, in the first year of Fair Wear membership, FC St. Pauli Merchandising collected external audit reports and worked on the corrective action plans (CAPs). Excessive overtime was found in factories in China and Turkey. The root causes were analysed, and the company was in close dialogue with the agents and the suppliers. FC St. Pauli Merchandising states that especially late fabric deliveries caused excessive overtime. However, FC St. Pauli Merchandising also mentioned placing mostly small order quantities and therefore having small leverage in the factories. This results in having a small impact on influencing excessive overtime in the factories. Nevertheless, concrete measures have not yet been implemented.

Recommendation: FC St. Pauli Merchandising GmbH & Co. KG could develop instruments or policies to deal with possible delays to avoid excessive overtime. Those instruments could include being flexible with delivery dates, prioritizing orders, offer support/flexibility for material delivery, ordering in low season, keeping stock etc. The outcomes of the root cause analysis can be used for identifying strategies that minimise the impact of its sourcing practice on working hours at other factories.

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

Comment: Pricing at FC St. Pauli Merchandising follows the top-down principle. Thus, the product development and purchasing department set a target price. This is negotiated with the agents. In general, FC St. Pauli Merchandising accepts the final price. Price increases due to inflation or material costs are accepted without negotiation. FC St. Pauli Merchandising has no insight into the labour costs of the product and has not linked its prices to wages in the production locations.

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

Recommendation: At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of Fair Wear's Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

FC St. Pauli Merchandising could provide suppliers who don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

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

Comment: FC St. Pauli Merchandising did not conduct Fair Wear audits in the first membership year, 2021/2022. However, the member brand collected external audit reports, which verified whether the legal minimum wages were paid in the factories. No findings reported that any production locations failed to pay legal minimum wages.

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 FC St. Pauli Merchandising was found. However, the payment to the suppliers is made by the agents. The payment terms are therefore determined between the suppliers and the agents. In some cases, FC St. Pauli Merchandising also makes prepayments (40%) to the agents, for example, to prefinance nominated materials. Since FC St. Pauli Merchandising mainly purchases existing stock from the agent for the NOS articles, it is difficult to track the payments to the suppliers as part of this Brand Performance Check.

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

Comment: FC St. Pauli Merchandising has not discussed the root causes of wages below living wage with its production locations.

Requirement: FC St. Pauli Merchandising must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. FC St. Pauli Merchandising is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

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: FC St. Pauli Merchandising has not determined and financed wage increases.

Recommendation: 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.

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: FC St. Pauli Merchandising has not set a target wage.

Additional comments: In addition to its Fair Wear membership and sustainability strategy, the football club and FC St. Pauli Merchandising are committed to many local projects in Hamburg. They often support projects in Hamburg with solidarity collections or cash donations. With its prints on the fan products, FC St. Pauli Merchandising also makes political statements, such as the campaign against war or statements for supporting the LGBTQ community.

Purchasing Practices

Possible Points: 52

Earned Points: 15

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	3%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	10%	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:	13%	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 Product Development Team is designated to follow up on problems identified by the monitoring system. The position of the CSR manager was newly-created and is now executed as a half-time job since December 2019.

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: In 2021/2022, FC St. Pauli Merchandising did not conduct any Fair Wear or external audits. The member brand collected external audit reports, assessed in indicator 2.6.

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: In 2021/2022, FC St. Pauli Merchandising did not conduct any Fair Wear audits but collected external audit reports. After receiving the external audit reports, the CAPs were created by FC St. Pauli Merchandising. The findings were divided into non-compliance findings, 'low', 'medium' and 'high-risk findings. Some of the CAPs also show the setting of deadlines for the factory management. The findings are discussed and followed up via email or video call with the agents. The member brand has an excel overview in which all suppliers are listed, including the current CAP status.

As this was the first year of Fair Wear membership, FC St. Pauli Merchandising started the follow-up on the CAPs with a focus on health and safety issues and the root cause analysis of the excessive overtime findings.

Recommendation: Fair Wear encourages FC St. Pauli Merchandising to continue strengthening its system to analyse how it might have contributed to findings and what changes the member brand can make in its purchasing practices.

Fair Wear recommends FC St. Pauli Merchandising to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	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: FC St. Pauli Merchandising checks all suppliers for other social audit reports regularly. The reports are collected, the Fair Wear Audit Quality Assessment Tool is done, and CAPs are integrated into the existing routine to follow up on improvement possibilities at the production sites. Reports from other organisations are actively used to follow up on uncovered points and to cross-check implementation status from what is reported by the supplier via email, phone and visits to the production site when possible.

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	Intermediate			3	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 Fair Wear membership, the FC St. Pauli Merchandising was focused on learning and understanding the human rights situation in specific production locations by collecting external audit reports and follow-up on CAPs. The company has not yet fully identified country-specific risks for its production countries or developed processes to prevent and mitigate possible risks. Nevertheless, in the past fiscal year, FC St. Pauli Merchandising has already started to take initial steps to comply with Fair Wear risk policies in relevant production countries.

Turkey:

Turkey is the most important sourcing country for FC St. Pauli Merchandising, with 35% of the member's FOB. FC St. Pauli Merchandising is fully aware of the risks faced by Syrian refugees in the Turkish garment industry. As such, FC St. Pauli Merchandising started working on a migrant worker policy for its Turkish suppliers in the past financial year. This policy will be shared with the agent and all suppliers from Turkey. Furthermore, the member brand prepared a questionnaire for the suppliers to evaluate the data regarding migrant workers in the factories. FC St. Pauli is also working on an internal guideline for the purchasing department to strengthen the sourcing dialogue with agents and suppliers in Turkey. The guideline also includes requirements for onboarding suppliers in Turkey.

Other risks.

China:

In 2021/2022, 11% of its production was sourced from China. FC St. Pauli Merchandising sees forced labour and the lack of collective bargaining as high risk in China. However, the issue was not yet addressed in the first year of Fair Wear membership. Nevertheless, the member brand has decided not to onboard any further suppliers from China.

India:

FC St. Pauli Merchandising sources through the agent in Germany, mainly from one supplier in Tirupur. The member brand knows that gender-based violence and discrimination are widespread issues in India. However, the issue was not yet addressed in the first year of Fair Wear membership.

COVID-19:

During the financial year 2021/2022, the purchasing and product development department has been in contact with agents to check the impact of the pandemic on the production process.

Recommendation: Fair Wear advises FC St. Pauli Merchandising to create a policy to identify and remediate forced labour in its Chinese supply chain. The member brand should include the decision not to onboard any suppliers in China anymore in its sourcing strategy.

Fair Wear recommends auditing all factories in Turkey and conducting specific Fair Wear training on Syrian refugees.

For India, Fair Wear recommends checking if the anti-sexual harassment committee that has been democratically elected is trained and is functioning properly. Fair Wear offers factory training on gender-based violence in India. The establishment of the committee (if not democratically elected) and its training are included.

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: Three of FC St. Pauli Merchandising's production locations are shared with other Fair Wear members. These production locations had audits before FC St. Pauli Merchandising joined Fair Wear. 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: 31% of FC St. Pauli Merchandising's FOB is produced in Portugal, Greece, Poland and Germany. The company has visited six production locations in Portugal and Germany and received the signed questionnaire and proof of the posted Worker Information Sheet.

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.	Yes	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.	1	2	0

Comment: FC St. Pauli Merchandising sells six external brands in its online shop and retail stores. Some of these are co-branded with the FC St. Pauli logo. However, FC St. Pauli Merchandising buys the products from external brands and finishes them with prints or embroidery at the finishing company in Germany. All external brands have signed the Fair Wear questionnaire. The production sites are not disclosed.

Recommendation: Fair Wear strongly recommends that FC St. Pauli Merchandising has transparent data and insights into information about the relevant production locations of the external brands.

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).	35%	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.	2	3	0

Comment: 35% of the total production volume from external producers are members of another credible initiative. That's a total of three out of six external brands.

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: 29

Earned Points: 19

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.	1	
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: In 2021/2022, one person from the Product Development Team was responsible for addressing worker complaints.

Recommendation: Fair Wear recommends appointing a substitute person to follow up on complaints in case the responsible colleague is absent. This person should have full access to the Fair Wear database.

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: FC St. Pauli Merchandising has a system in place to check whether the Fair Wear CoLP is posted. The member asked for photographic evidence of its suppliers to show that the sheet was posted at 29 factories. The other production locations, including all subcontractors, did not provide evidence that the Worker Information Sheet was posted.

Requirement: FC St. Pauli Merchandising GmbH & Co. KG 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. FC St. Pauli Merchandising GmbH & Co. KG 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.

Recommendation: Fair Wear recommends FC St. Pauli Merchandising to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. FC St. Pauli Merchandising should ensure good quality systematic training of workers and management on these topics. To this end, FC St. Pauli Merchandising can either use Fair Wear's WEP Basic module, or implement training related to the Fair Wear CoLP and complaint helpline through third-party training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

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: FC St. Pauli Merchandising received one complaint in 2022 from a supplier in Turkey. The complainant stated that the service bus did not take the workers to their homes after their night shift. The workers noted that the service bus took them to the main street, and the workers had to walk home. In particular, for female workers, this was stated as a risk. Together with another Fair Wear member brand, which also sourced in that factory, FC St. Pauli Merchandising was in close contact with the factory management and the HR department to find a solution. A communication training session should have been organised to support internal grievance mechanisms. As the supplier cancelled the cooperation with FC St. Pauli Merchandising because of small quantities, the member brand could not contact the factory anymore regarding the complaint. The other Fair Wear member brand has terminated its Fair Wear membership. Thus, no training has taken place in the factory, and the complaint could not be solved.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	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.	2	2	0

Comment: FC St. Pauli Merchandising actively cooperated on the complaint follow-up with another Fair Wear member brand also sourcing at the supplier where the complaint was filed.

Complaints Handling

Possible Points: 11

Earned Points: 8

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: FC St. Pauli Merchandising joined Fair Wear in 2021. Through a series of presentations, every employee was informed about Fair Wear and the company's reasons for joining.

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: FC St. Pauli Merchandising is a small company where information about production location is regularly shared between employees and departments. Especially in the product development and purchasing department, Fair Wear requirements are included in regular updates.

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: FC St. Pauli Merchandising works with nine agents with which the member brand has written agreements. The agents play an essential role for FC St. Pauli Merchandising as key business partners in purchasing practices and handling logistics. In particular, the agent from Germany takes a central role in this. It can be noted that this agent is also certified for the Green Button (german: Grüner Knopf) and uses other labels, such as Fair Trade. This agent is also a member of the German Partnership for Sustainable Textiles (PST).

FC St. Pauli Merchandising is in regular exchange with its agents. All agents support the follow-up of the CAPs and implementation of all Fair Wear requirements. The agents have direct contact with the factories. FC St. Pauli Merchandising, therefore only has indirect contact with its suppliers. All agents received an announcement letter to join the Fair Wear membership. In addition, video calls were made to inform the agents about the membership and requirements.

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.	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: FC St. Pauli Merchandising has written contracts and written agreements with the agents. According to the agreement, subcontracting is not allowed unless the supplier informs in advance. After writing the order, the member brand receives information from the agent about the production location. Only after confirmation from FC St. Pauli Merchandising, the order will be released. The company also collects external audit reports, which provide information on whether unauthorised subcontracting is taking place.

Recommendation: Fair Wear recommends FC St. Pauli Merchandising periodically check with its agents whether all known production locations are still up to date and use the information from questionnaires to update supplier data, including subcontractors. It is also recommended to regularly visit the supplier to cross-check the use of unauthorized subcontracting.

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: FC St. Pauli Merchandising is a small company where information about production location is regularly shared between employees 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: FC St. Pauli Merchandising has included information about its Fair Wear membership on the websites of the online shop. Both brands are included here. However, Fair Wear membership is listed under 'certifications', which is incorrect due to Fair Wear's approach not to certify but to verify the brand's and supplier's improvements on the Fair Wear CoLP.

Recommendation: FC St. Pauli Merchandising needs to ensure on its website that Fair Wear membership is not linked to the part of 'certifications'. It should be in line with Fair Wear communication guidelines.

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: As this is the first Brand Performance check report of FC St. Pauli Merchandising, no prior reports could be published yet. The member brand has disclosed production locations to other member brands. 89% of production volume is disclosed in the internal Fair Wear system and 0% on the Fair Wear website.

Requirement: Fair Wear requires FC St. Pauli Merchandising to disclose production locations 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.	For new member companies	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	N/A	2	-1

Comment: In the first year of Fair Wear membership, FC St. Pauli Merchandising has not published a social report on the website.

Transparency

Possible Points: 4

Earned Points: 3

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: FC St. Pauli Merchandising's CEO is involved in all parts of the organisation, including Fair Wear membership. As 2021/2022 was the first year of its membership, the organisation has not yet formally evaluated its membership.

Recommendation: Fair Wear advises FC St. Pauli Merchandising 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

FC St. Pauli Merchandising has noted as positive feedback that the speed in responding to emails has improved significantly since 2022. The member brand also finds the resources Fair Wear provides very helpful. In general, FC St. Pauli Merchandising sees a challenge with the manual handling of the internal Fair Wear database. The company also finds implementing the new BPC Guide from 2022 complex, especially as a new Fair Wear member brand. In the future, FC St. Pauli Merchandising would like Fair Wear to provide training for agents as well so that the agents can also learn from the organisation.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	15	52
Monitoring and Remediation	19	29
Complaints Handling	8	11
Training and Capacity Building	5	5
Information Management	4	7
Transparency	3	4
Evaluation	2	2
Totals:	56	110

Benchmarking Score (earned points divided by possible points)

51

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

01-12-2022

Conducted by:

Victoria Lauer and Annet Baldus

Interviews with:

Carina Weh (CSR & Product Management)

Catharina Fricke (Head of Purchasing & Product Management)

Alexander Timm (Marketing & Communication)

Bernd von Geldern (CEO)