



Brand Performance Check

GANNI A/S

This report covers the evaluation period 01-01-2022 to 31-12-2022

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.

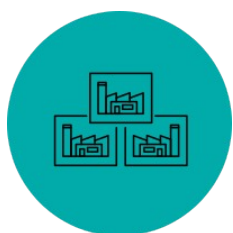
Scoring overview

Total score: 98

Possible score: 194

Benchmarking Score: 51

Performance Benchmarking Category: Good



Sourcing strategy

53%



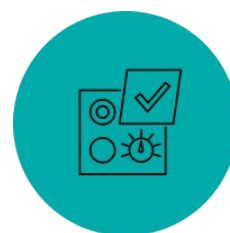
Identifying continuous human rights risks

47%



Responsible purchasing practices

54%



Quality and coherence of prevention and remediation system

47%



Improvement and prevention

54%



Communication, transparency and evaluation

44%

Summary:

GANNI has met most of Fair Wears' performance requirements. With a total benchmarking score of 51, the member is placed in the Good category.

As a first-year member, GANNI has focused on setting up the basic structures for its membership. GANNI has a solid Responsible Business Conduct Policy in place following OECD requirements. GANNI's sourcing strategy focuses on increasing influence through consolidation. Since 2020, GANNI started tracing the supply chain and has been actively consolidating its tail end, especially the large subcontractor base. GANNI considers this a high risk and is therefore working on decreasing the supply chain tail end. GANNI's sourcing strategy focuses on maintaining long-term relationships.

GANNI conducts risk scoping on country, sector, business model, sourcing model and product level. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The member adjusts its sourcing strategy based on the risk scoping. The risk scoping misses a gender lens across all risks, but the risks of sexual harassment and gender-based violence are included. GANNI's risk scoping feeds into a solid factory-level risk analysis, which includes all direct suppliers. GANNI based its risk analysis on various sources and does not rely solely on information from audit reports. When an audit does not identify harms common to the region, GANNI collects other data. GANNI is yet to include its subcontractors and the suppliers of its design collaboration partners in its risk scoping.

GANNI has drafted follow-up plans matching the country risk profile for all its direct suppliers (63% of FOB). Moving forward, GANNI is recommended to expand its follow-up programmes to its subcontractor base. Although GANNI has not yet created a gender lens across its risk analysis and follow-up programmes, the member has implemented an improvement and prevention programme that includes a gender lens for one of its suppliers in India. Furthermore, the member has set clear target wages and has started implementing fact-based costing at one supplier. GANNI also started paying the increased FOB price here, and a living wage premium was already paid at the end of 2022 to the workers at this supplier. GANNI is encouraged to continue working on this topic and, from now on, to ensure wage increases are a part of the base wage rather than a premium.

For a first-year member, GANNI has set up a strong basis from which to continue its Fair Wear membership. GANNI is encouraged to increase its efforts on the topic of social dialogue and to expand its efforts to all suppliers, including subcontractors and suppliers from design collaborators.

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.

Company Profile GANNI A/S

Member company information

Member since: 1 Jan 2022

Product types: Garments, clothing, fashion apparel, Bags, Accessories and Footwear

Percentage of CMT production versus support processes 78%

Percentage of FOB purchased through own or joint venture production 0%

Percentage of FOB purchased directly 63%

Percentage of FOB purchased through agents or intermediaries 54%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's Sustainable Apparel Coalition,

Number of complaints received last financial year 1

Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes

Work Plan and projected production location data have been submitted for the current financial year? No

Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
China	16	32
Portugal	18	32
Türkiye	22	13
India	6	10
Spain	2	4
Italy	8	3
Republic of Moldova	1	3
Romania	1	2

Layer 1 Foundational system's criteria

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

Comment: GANNI has a solid Responsible Business Conduct Policy in place.

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.: Yes

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

Comment: GANNI discloses 100% of production locations internally through Fair Wear's information management system.

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

Comment: GANNI discloses 100% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 46

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

Comment: GANNI has a sourcing strategy addressing influencing labour conditions. The member has 74 active suppliers. 72% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 21% of the production volume comes from suppliers where GANNI buys less than 2% of its total FOB. GANNI's sourcing strategy focuses on increasing influence through consolidation. GANNI started tracing the supply chain in 2020 and since then has been actively consolidating its tail end, especially the subcontractor base. GANNI inquires which other brands are sourcing at potential factories and collaborates with others on various topics. However, increasing influence through cooperation with other clients is not yet explicitly included in the sourcing strategy.

Recommendation: GANNI could include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Intermediate	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	4	6	0

Comment: GANNI has a sourcing strategy that focuses on maintaining long-term relationships. 49% of the member's total FOB volume comes from suppliers with whom GANNI has a business relationship for at least five years.

In 2022, the member developed a long-term framework contract, which it will start to use from 2023 onwards with some of its suppliers. These range three years and include commitment regarding order quantities for the set number of years. The framework is a type of two-way contract and includes supplier commitments regarding human rights topics, such as payment of a living wage, traceability and participation in audits in return for the forward-looking order commitment.

Recommendation: Fair Wear recommends GANNI to implement the developed long-term two-way contracts.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

Comment: GANNI conducts risk scoping and the following risk factors country, sector, business model, sourcing model and product level. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The member adjusts its sourcing strategy based on the risk scoping, especially the risks related to sourcing model (working with subcontractors, fragmented supply chain) have led the member to focus on consolidation of the subcontractor base in the past years. For example, risk scoping identified that high risks are associated with the product type (knitwear) and the sourcing model for this product (fragmented industry). As a consequence, GANNI focused on consolidating its tail end especially in Italy and tries to source as much as possible from vertically integrated suppliers. The risk scoping misses a gender lens across all risks, but the risks of sexual harassment and gender-based violence are included. GANNI sources in China and has included the risk to forced labour in its risk scoping.

To date, GANNI's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. GANNI is yet to include the production countries of its design collaboration partners in its risk scoping.

Recommendation: Fair Wear strongly recommends GANNI to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy. The member is urged to assess the risks of working with licensees or design collaborations. It is also recommended to include licensing for design collaborations as a business model risk.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Intermediate	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	2	4	0

Comment: It is the standard process for GANNI to inform new suppliers about Fair Wear membership by sharing the Code of Conduct (CoC) and the Mutual Business Agreement (MBA). These documents include the Code of Labour Practices (CoLP) and other HRDD topics such as anti-corruption and transparency. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and GANNI can cooperate on this topic, following the development of the mutual business agreement. As GANNI is a new member, this process has been followed for all direct suppliers last year. GANNI is yet to extend the process to indirect suppliers/subcontractors and its design collaboration partners.

Recommendation: GANNI is recommended to engage in dialogue with all suppliers, including subcontractors. GANNI is recommended to also include suppliers of its design collaboration partners.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Basic	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	2	6	0

Comment: GANNI collects human rights information of potential new suppliers by collecting self-assessment questionnaires including the Code of Labour Practices (CoLP) and questions about internal grievance mechanisms, existing audit reports, and if needed by organising Fair Wear audits. As GANNI is a first-year member, it had to collect the information from all its suppliers in 2022. GANNI also organised one-on-one calls with its direct suppliers. GANNI uploaded collected questionnaires to Fair Wear's internal system. In 2022, GANNI managed to collect the questionnaires from its direct suppliers, and not from all subcontractors. As a consequence, over twenty questionnaires are still missing. GANNI is planning to collect these, but as the member is also consolidating the subcontractor base, it did not spend much effort on collecting questionnaires from subcontractors which may be exited in the near future. The member did not yet have examples of this information being used to inform sourcing decisions in 2022, as it just started to collect information this year. Information from workers is not included. GANNI does not yet follow this process to collect information about working conditions for suppliers used by partners in design collaborations.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order. Fair Wear strongly recommends that the member collects information about working conditions for suppliers used by licensees or partners in design collaborations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

Comment: Being a new member, GANNI has shared information about Fair Wear's CoLP and the complaints helpline in 2022 with its suppliers by sharing the documents and discussing them in calls. GANNI also collects information about the internal grievance mechanisms at its suppliers. The Worker Information Sheet has been posted at suppliers with a direct relationship, but GANNI still needs to ensure that it is also posted at all subcontractors. GANNI has not yet organised onboarding sessions for its workers and management of its suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue.

Recommendation: Fair Wear recommends GANNI to check whether the worker information sheet is posted at all production locations, including subcontractors, at a place that is easily accessible and safe for workers.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

Comment: GANNI has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for its suppliers with which the member has a contractual relationship. It has determined the appropriate monitoring tool and frequency per supplier. For instance, the brand monitors its suppliers in the countries that its risk scoping identified as having a higher risk of low transparency and potential unauthorised subcontracting by enrolling them in audits. GANNI uses Fair Wear audits in its monitoring, which include worker and stakeholder input. When the monitoring tools do not identify risks which GANNI has identified as prevalent in the country or related to the product type, it changes monitoring tool, by collecting other data. For example, the member is aware that in China, the member knows that wage data is often unreliable due to piece rate work. Therefore, additional wage data is collected. In India, if audits do not find anything related to gender discrimination, the member requests more information because GANNI knows this is a likely potential harm. GANNI has not yet included its subcontractors in the monitoring system, but the member asks its agents to collect information from subcontractors as well.

Recommendation: GANNI should include all its suppliers, including subcontractors and suppliers of design collaboration partners, in its monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Basic	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	2	6	0

Comment: GANNI has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country. The risks identified are restricted union activity, worker representation not being democratically elected, worker committees not being allowed to function. GANNI has not yet included the specific risks to women workers. GANNI collects information about social dialogue mechanisms at the suppliers through questionnaires. GANNI has a supplier-level understanding of the risk for its direct suppliers.

Recommendation: GANNI should include all its suppliers when assessing risks related to FoA. Furthermore, GANNI should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0

Comment: The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified large gender-pay gaps, limited access to supervisory positions and gender-based violence as important risks prevalent in India. Although GANNI could demonstrate a basic understanding of gender risks for its sourcing countries during the performance checks, the gender lens has not been fully included across its risk scoping. Nevertheless, GANNI has collected gender-disaggregated wage data for its suppliers, and based on the assessment of gender risks, GANNI has started an improvement and prevention programme in India (see 3.2).

Recommendation: Fair Wear recommends the member to collect country-level gender risks for all its sourcing countries and each Code of Labour Practices element.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Intermediate	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	2	4	0

Comment: In 2022, GANNI has developed a strong and systematic evaluation system for assessing suppliers' human rights performance. The supplier sustainability evaluation focuses on social and environmental achievements, and the supplier's commitments for improvement. Suppliers are scored on nine criteria: social compliance, subcontractor management, supply chain traceability, certificates, carbon, circularity, innovation, progress and quality of response. Suppliers are scored 1-5 on all criteria, which leads to an overall score. GANNI has yet to start using the evaluation system in 2023. The information from the evaluation form is meant to feed back to the production team. GANNI does not yet include design collaboration partners in this evaluation, or subcontractors' human rights performance.

Recommendation: GANNI is strongly recommended to evaluate the human rights performance of suppliers used by its licensees or partners in design collaborations.

Fair Wear encourages GANNI to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Intermediate	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	2	4	0

Comment: GANNI uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. GANNI recognises that its sourcing model (use of many intermediaries) presents a high risk of unauthorised subcontracting. The member collects traceability information from suppliers about subcontractors, but sometimes this is sent to GANNI when production is already committed. The obligation to inform GANNI of all subcontractors is included in its business agreements. GANNI has detailed insight into the production processes and what styles need which processes. In 2022 this was still mostly based on input from suppliers themselves. GANNI wants to create a better system which includes validated data.

As GANNI is still working to onboard suppliers onto its commitment to Fair Wear, when unauthorised subcontracting was identified in 2022, the brand just accepted this and asked them to also get on board. GANNI knows factory-level capacity, and can make a decent assessment of whether subcontracting will be helpful. As part of preventive measures, GANNI is also looking into consolidation of the subcontractor base. Production colleagues also sometimes visit the suppliers while production is taking place.

Recommendation: GANNI is recommended to use the outcomes of its human rights monitoring to prevent unauthorised subcontracting. This can mean the member ensures the supplier is visited during production for locations with a higher risk of unauthorised subcontracting.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	2	4	0

Comment: GANNI has identified whether homework is prevalent in its sourcing countries, especially by checking which product categories have a higher risk of homeworkers. The topic is also discussed with suppliers and it is included in the Code of Conduct. GANNI has identified one supplier employs homeworkers in 2022. Next steps on this will follow in 2023.

Recommendation: GANNI is recommended to ensure suppliers that work with homeworkers do so in a responsible way. Fair Wear recommends GANNI to conduct a capacity analysis looking into specific production processes to validate the suppliers' statements that no homeworkers are used.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Insufficient	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	0	4	0

Comment: GANNI uses contracts with its suppliers. The member has agreements in the form of mutual business agreements (MBA) that stipulate terms of payment, liability, and penalties. The MBA refers to the Code of Conduct (CoC), which suppliers also sign, which includes the Fair Wear Code of Labour Practices and other human rights due diligence elements. Additionally, the contracts include the intention of shared responsibilities of CoLP implementation. Materials are usually prepaid, and sometimes a part of production is also prepaid. GANNI's standard payment term is mostly 60 days after the estimated time of delivery (ETD); unless otherwise agreed with the supplier.

Nevertheless, for example, in the case of delay, the contract places the burden on the supplier. With this, GANNI is entitled to receive a compensation of 200% from the supplier in case of more than one week of delay in case of shipment by truck or three weeks in case of shipment by sea. If delays are caused by GANNI (for example, through late changes in design), this does not apply. In practice, according to the member, usually, the situation is evaluated before claiming compensation and trying to find a middle ground. Nevertheless, the contract does not include this practice.

Fact correction: In our MBA it is stated that the "unless the delay is caused by GANNI's failure to comply with its obligations under this Agreement, including any amendments to the Purchase Order". To date GANNI has never applied for the 200% compensation.

Recommendation: Fair Wear strongly recommends GANNI to reduce payment terms to 60 days upon goods being loaded on the vessel and include agreements on the provision of materials in the contract. Fair Wear also strongly recommends that GANNI remove penalties for late delivery from its contracts or at least ensure there is 'proof of fault by the supplier'.

GANNI is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in their decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

Recommendation: GANNI could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

Comment: The brand starts production planning by looking at its own selling date goal. The average lead time is minimum eleven weeks from the moment the orders are placed. However, the member starts discussing capacity with the supplier about eight to nine months before the projected delivery date of the order. GANNI works with forecasts and uses the forecasted volume to inquire from the supplier whether the projected production plan for the order fits the supplier's schedule, taking into account other orders, local holidays, etc. If needed, the delivery date can be changed according to the suppliers' request. GANNI has historical lead times for all materials and for all types of products, which is also taken into account when doing planning for new products. Then the actual planning is done with the suppliers. For some product categories, GANNI knows all steps. GANNI is yet to create a systematic way to save all this information, but generally documents the data from past production.

If the forecast is not correct (too low), it is discussed with the supplier whether the increased order can be delivered at a later moment or GANNI pays for a faster type of transportation. Once the design is completed, and changes are still made in a very late stage, this has to be signed off by GANNI's higher management. If the forecast turns out to be too low, GANNI either pays a fee for the missing orders or tries to still fill up the capacity with different orders.

GANNI works mostly through intermediaries. For some of these intermediaries, GANNI has a clear understanding of the capacity of the capacities of subcontractors which are involved in production, but not for all of them. GANNI is not in direct contact with subcontractors.

Recommendation: Fair Wear strongly recommends GANNI to include all subcontractors when considering strategies to avoid causing excessive overtime.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at 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, cost sheets including labour minutes.	4	6	0

Comment: GANNI has a strong understanding of the wage levels at its direct suppliers and partly connects this understanding to its own buying prices. GANNI has an overview of wage levels at suppliers to verify whether legal minimum wages can be met at its production locations. In 2022, GANNI has started working on fact-based costing with some suppliers. One supplier in India did the Fair Price introduction training and GANNI supported this supplier in developing a calculation method which fits the company's business structure. Based on this, GANNI has started paying prices which include a labour cost component calculated based on a living wage benchmark developed with external data and in collaboration with the supplier and workers. In 2022, this led to the payment of the first living wage premium to the workers at this factory.

Generally, when setting prices, GANNI asks for a price from the supplier and if it is too high, the specs of the product are changed at the product development level, so that the production becomes slightly less costly (different trims, materials, etc.). Increases in legal minimum wage or inflation are not specifically taken into account in the negotiation process. GANNI is planning to work through fact-based costing in the coming years.

Recommendation: GANNI could provide suppliers who do not work with fact-based costing yet, 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. When working on fact-based costing with suppliers, it is advised to engage directly with the production location rather than the intermediary.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Intermediate	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	2	4	0

Comment: GANNI has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. All intermediaries are involved in human rights work and following up the Corrective Action Plans. GANNI also partly involves the subcontractors in those meetings directly.

Recommendation: The member is recommended to check if the intermediary's purchasing practices are fair and if the intermediary has adequate systems to ensure payments are made on time.

Layer 3 Remediation and impact

Possible Points: 86

Earned Points: 44

Indicators on Quality and coherence of prevention and remediation system

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Intermediate	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	4	6	0

Comment: GANNI has drafted follow-up plans, and these match the country risk profile. The follow-up plans are based on the factory risk assessment and they are done on factory level. For example, in China, GANNI focuses its actions on excessive overtime, lack of freedom of association and the risk of low social insurance coverage. At a factory where the social insurance coverage is relatively low, this topic is not prioritised in the follow-up plan, but at another Chinese factory it is. This is not in line with the risks identified in Layer 2. On top of that, GANNI has follow-up plans going beyond CAPs for individual factories covering 63% of its FOB (all suppliers with which GANNI has direct business relationships).

Recommendation: Fair Wear recommends GANNI to ensure also subcontractors have a follow-up plan that matches their risk profile.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Intermediate	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	4	6	0

Comment: Although GANNI has yet to include a gender lens across its risk scoping, the member has already started an improvement and prevention plan in India, where it finds the risks related to gender inequality particularly high. GANNI collected gender disaggregated wage data to analyse the gender-pay gap at one supplier in India and analysed what type of jobs were mainly occupied by male and female workers. The member found that the higher-paid jobs were male-dominated. This was the factory where GANNI also implemented its living wage project, so when the living wage premium was paid out, it mostly went to the lowest earners (women workers). As such, GANNI started closing the gender-pay gap as it started working on the living wage gap (see also 3.13).

Furthermore, as part of preventive action, GANNI raised funds through the sales of non-medical face masks to pay for a leadership training, enabling more women workers to become supervisors and participate in higher paid jobs. The leadership programme was executed by a local NGO. The factory incorporated elements from this training programme into its own in-house training programme, enabling more women to climb up in the company.

Besides this, the gender lens has not yet been implemented across all of the member's improvement and prevention plans.

Recommendation: GANNI is recommended to extend its gender lens to the implementation of all its improvement and preventive actions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: GANNI included some steps to encourage FoA and effective social dialogue in its improvement actions. These steps are following up on findings related to ineffective internal grievance mechanisms in Chinese factories and supporting improvement of these mechanisms. GANNI has not yet included steps to encourage FoA and effective social dialogue in its prevention actions. The member has yet to ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: GANNI is recommended to support in financing/coordinating training on FoA and social dialogue for its suppliers.

GANNI is strongly encouraged to ensure worker representatives are involved in the steps that the member takes to promote freedom of association and effective social dialogue.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Basic	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	2	6	0

Comment: As a new member, GANNI assessed suppliers' internal grievance mechanisms as part of the introduction into the work with Fair Wear. This was done through questionnaires and individual meetings with all contractual suppliers. GANNI is yet to also include all subcontractors in this process. As a new member, GANNI did not yet actively support the effectiveness of internal grievance mechanisms in 2022. GANNI follows up on issues related to factory-level grievance mechanisms when they come up in CAPs, for example by planning training or digital solutions to improve the mechanisms, but this has not been implemented yet in 2022.

Recommendation: Fair Wear recommends GANNI to support and monitor the internal grievance mechanisms at all suppliers, including all subcontractors.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Basic	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	2	6	0

Comment: GANNI cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. GANNI has not yet cooperated with customers that are not Fair Wear members. Next to that, the member also plans to cooperate in taking more preventive measures, such as joint living wage work, but this has not yet materialised in 2022.

Indicators on Improvement and prevention

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	74%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

Comment: During the performance check, the member could demonstrate with a sample that more than two-thirds of the CAP issues requiring improvement actions have been followed up.

GANNI has shown that it also followed up on more structural and complex issues, such as the occurrence of excessive overtime at the Chinese sample supplier, which was brought down in the past years. At a Turkish factory, a finding related to the internal grievance mechanism was followed up with a training. Some more simple findings related to occupational health and safety, such as ergonomic chairs, have not been followed up. One audit in 2022, not used for the performance check sample check, included findings related to child labour. At that time, the subcontractor was not producing for GANNI. The last order was placed in 2019. Given previous production history with the subcontractor, GANNI actively followed up on this by working with a local children's rights NGO that supports families financially to enable working children to go back to school. Three children aged between 14 and 15 years were found at the subcontractor in Türkiye, and GANNI was in touch with all children's families to enable them to make use of the program for the children to go back to school. Not all families wanted to cooperate, but at least one child went back to school soon after the case was discovered.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Basic progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	2	6	-2

Comment: GANNI has identified root causes of some CAP issues, such as low wages potentially lead to child labour. However, the member also sees many root causes are within the socio-economic system and hard to address within the structure of the supply chain. Nevertheless, the member has started to develop some preventive steps. Specifically following up on the child labour case, GANNI focused on preventive action by creating a child labour policy and connecting with an external expert organisation about this. Together with the external expert organisation, GANNI developed a preventive training program for the agent based in Türkiye.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	No factories in the respective risk profile	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	N/A	6	0

Comment: GANNI does not find any of its suppliers do not need any improvement or prevention steps. Its risk assessment shows that also in 'low' risk countries such as Spain and Italy, there are significant risks related to the product type, and the brand plans to audit the factories there as well.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Basic	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	2	6	0

Comment: In the previous year, one out of two Fair Wear audit reports mentions excessive overtime. The factory where excessive overtime occurs is a subcontractor and GANNI has identified one of the root causes to be the main supplier's production planning. GANNI also identified that it has to work on this by supporting the supplier in getting a better understanding in how to plan in a way that it does not cause excessive overtime, to ensure the supplier books capacity on time. Another root cause identified was a lack of workers at the factory. It is GANNI's goal to help the suppliers in creating a stable subcontractor base, which GANNI regularly buys from, so the production can be stabilised and it will be more attractive for workers to stay at the factory.

Recommendation: With its suppliers where excessive overtime occurs, Fair Wear recommends GANNI to verify whether production is planned with overtime. If production is planned with overtime, the brand should ensure that its products can be produced during regular working hours.

Fair Wear advises GANNI to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Advanced	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	4	4	-2

Comment: In the previous year, one out of two audits included findings regarding non-payment of legally required wage elements. GANNI actively followed up on this and requested evidence that missing premiums have been paid to all workers entitled to this. The root cause of the issue has been discussed with the intermediary, which is a lack of proper wage systems. GANNI finds the intermediary needs to support the subcontracting factories in setting this up and discussing that is part of the follow-up of the issue. Consequently, the factory has established an annual leave recording system, and has amended its employment contract with day's wages for the national and public days.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages 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.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	4	6	0

Comment: GANNI understands which suppliers pay wages below living wage estimates as a consequence of the member’s policies/actions. GANNI reviewed internally how the member’s practices (prices) could be altered to ensure the member supports payment of living wage at suppliers. GANNI has not yet discussed this with all suppliers, because the member wants to wait to start the conversation on this topic until it is ready to also follow up and start a living wage project with the supplier. As such, it has discussed this with three suppliers in Turkiye and India (4% of its suppliers). In general, GANNI has done a root-cause analysis based on its risk scoping and audit findings to find out why wages at suppliers are below the living wage. Based on the root-cause analysis, GANNI has developed a time-bound plan to enable the systemic increase of wages at all its suppliers.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Advanced	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	6	6	0

Comment: GANNI has started to address the topic of living wage internally, by creating a roadmap and a time-bound plan defining the company wants all suppliers to be paying living wages by 2025. A person in the finance team has been hired to calculate exactly the financial implications of this goal going forward, based on the living wage gap document. GANNI has already started paying prices which support living wages at one supplier, the costs for which have been absorbed by the company's margin. Going forward, it will be likely to revisit the retail prices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	5%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

Comment: GANNI uses fact-based costing to ensure its prices support the payment of a living wage estimate at suppliers responsible for 5% of GANNI's FOB. GANNI has done a wage analysis for its suppliers, according to which several factories in China are also paying a living wage. However, as in this analysis piece rate and overtime were not considered, these factories do not count towards this indicator. In 2023, GANNI collaborates with Fair Wage Network for a proper wage analysis, which may show some of these factories meet living wage going forward.

Recommendation: GANNI is encouraged to roll out its approach to other suppliers. GANNI is also encouraged to always take the lowest wage earners as the wage floor when looking at the living wage gap, rather than the average wage in the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

Comment: GANNI received no complaints in the past financial year.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Basic	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	2	6	0

Comment: GANNI implemented a women leadership training at a factory in India, as part of its improvement and prevention plan on the risk of gender inequality (see indicator 3.2). Being a first-year member, GANNI has not implemented any other training programmes in 2022.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Basic	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	2	6	0

Comment: As GANNI organised the training with an external NGO, a training report was not shared with Fair Wear. GANNI followed up on the implemented training by supporting the supplier in implementing the training at other subcontractors as well and turning it into a part of the formalised company training programme. The number of female supervisors at the subcontractors has increased demonstrably. The member has not yet used the results of the training as input for its human rights risk monitoring.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	Insufficient	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	0	4	0

Comment: GANNI's human rights risk monitoring does not include a responsible exit strategy yet. In the past financial year, the member stopped working mostly with subcontractors as the member is in the process of consolidating its subcontractor base. The member enquires at the main supplier how the loss of business will impact the subcontractor. Usually, it does not make a big difference because the suppliers are not low on work. GANNI never cancels orders which are already in the pipeline and always finishes committed orders. However, the process was not on paper in 2022 and was not discussed with suppliers as such.

Requirement: GANNI must have human rights risk monitoring that includes a responsible exit strategy.

Recommendation: GANNI could include the responsible exit strategy as part of its suppliers' agreement or contract or discuss it with suppliers as part of its supplier evaluation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

Comment: GANNI does not undertake activities related to human rights that go beyond Fair Wear's scope.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 18

Earned Points: 8

Indicators on Communication, transparency and evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

Comment: GANNI communicates accurately about Fair Wear membership on its website.

Recommendation: GANNI could develop materials about Fair Wear membership to share with retailers and (web)shops. The Fair Wear third-party resellers flyer can support in explaining Fair Wear, Fair Wear's work and the communication rules for third parties.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: GANNI does not sell external brands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 Social report is submitted to Fair Wear and is published on the member company's website.	Insufficient	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	0	4	0

Comment: GANNI has submitted its social report, but it was missing several required elements, and therefore it was not approved by Fair Wear.

Requirement: GANNI's social report needs to meet the basic requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Insufficient	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	0	4	0

Comment: GANNI does not report on factory-level remediation results.

Requirement: GANNI should report on factory-level data and remediation results. Good reporting by members helps to ensure the transparency of the member and Fair Wear's work.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Advanced	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	6	6	0

Comment: GANNI has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations.

The internal evaluation system involves top management. In its evaluation system, the member includes triangulated information from external sources, such as input from the B-Corp certification (on policy work), WageIndicator and the Fair Wage Network (for living wage). GANNI is still working on a supplier evaluation survey to also include supplier input in the evaluation of progress.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	No requirements were included in the previous Brand Performance 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 should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Not applicable

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

Recommendations to Fair Wear

- first year membership was quite a big transition for GANNI.
- Not everything has helped GANNI to do things, there is a lot of information where they missed a little more guidance about how to go about certain things
- For the bpc they would have liked bit more guidance on preparing, was not sure what to expect, difficult. would have been nice if the brand liaison had helped with some self assessment type stuff.
- HRDD - how does it compare to other organisations which can expand this to other organisations which go deeper into the tiers
- the Member Hub can be designed better: the cap when it's shared with other brands, how can they see it
- the gender part - hoping to get more information and guidance on different parts. its not incorporated into the audits, so it's not clear what to do with them. how to bring gender fact sheet down to factory level, more practical guidance on this topic.

Brand Performance Check details

Date of Brand Performance Check: **02-08-2023**

Conducted by: **Paula de Beer**

Interviews with: **Rachel Chuang** (Social Responsibility Manager)

Lauren Bartley (Sustainability & CSR Director)

Gry Anna Nordensgaard (Production & Product Development Director)

Ida Christensen (Director of Finance & Accounting)