



Brand Performance Check

OLYMP BEZNER KG

Publication date: February 2024

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: 94

Possible score: 208

Benchmarking Score: 45

Performance Benchmarking Category: Good



Summary:

OLYMP BEZNER KG (hereafter OLYMP) has met most of Fair Wears' performance requirements. With a total benchmarking score of 45, the member is placed in the Good category.

OLYMP has two product supply chains and therefore two sourcing strategies in practice. One is OLYMP BEZNER KG sourcing for regular volumes, and the other is OLYMP Retail KG sourcing smaller volumes for the retail stores. Both strategies address influencing labour conditions. OLYMP's overarching strategy is to consolidate and build long-term partnerships with its suppliers, avoid supplier switching, and understand its suppliers' mindset. Although 91% of the member's total FOB volume comes from suppliers with whom OLYMP has had a business relationship for at least five years, OLYMP has not yet committed to long-term contracts and does not have a formal, written sourcing strategy.

The member brand has initiated the development of its supplier's human rights evaluation. However, a systematic evaluation of human rights performance at its suppliers is still pending. While the member has commenced gender-disaggregated data collection, OLYMP has yet to incorporate a gender lens in its action plans across suppliers.

OLYMP has a good understanding of the wage levels at its suppliers, and does verify whether legal minimum wages can be met at its production sites. The member brand has started working with some form of fact-based pricing, including inflation, raw material, energy, and other cost increases for most of its styles. OLYMP does not yet have a strategy on how to finance wage increases at its suppliers. OLYMP has had an intern writing a paper on a living wage, which provides the basis for the next steps. Although the brand has taken some steps, it needs to find a way to work on open costing with its suppliers, but no concrete action has been taken yet on implementation. The member is in continuous dialogue with its suppliers on the living wages topic but has not yet defined its benchmark wages.

Fair Wear encourages OLYMP to continue working on its living wage strategy and setting the first concrete steps. Fair Wear recommends that OLYMP adjust its sourcing decision based on its risk assessment.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for members. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

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 OLYMP BEZNER KG

Member company information

Member since: 1 Jan 2021

Product types: Garments, clothing, fashion apparel and Men's Shirt, Knitwear, Accessoires

Percentage of CMT production versus support processes 100%

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

Percentage of FOB purchased directly 91%

Percentage of FOB purchased through agents or intermediaries 7%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? Yes

FLA Member No

Member of other MSI's/Organisations International Accord,

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? Yes

Membership fee has been paid? Yes

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

Production Country	Number of production locations	Percentage of production volume
Indonesia	2	30.79%
Bangladesh	10	26.71%
Viet Nam	5	21.88%
China	10	9.68%
North Macedonia	1	3.18%
India	6	2.62%
Tunisia	2	1.36%
Albania	1	1.29%
Türkiye	6	0.91%
Hungary	1	0.67%
Bulgaria	1	0.33%
Ukraine	1	0.26%
Pakistan	1	0.14%
Portugal	1	0.08%
Spain	1	0.03%
Sri Lanka	1	0.03%
Germany	1	0.03%
Italy	1	0.01%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

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

Comment: OLYMP 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: OLYMP discloses 81% of production locations internally through Fair Wear's information management system. Fair Wear does not disclose Chinese factories on its website yet and therefore is lenient when members do not disclose Chinese factories.

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

Comment: OLYMP discloses 81% of production locations externally on Fair Wear's transparency portal. Fair Wear does not disclose Chinese factories on its website yet, and therefore is lenient when members do not disclose Chinese factories.

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: OLYMP does not have a formal written sourcing strategy. However, the member brand is practicing a sourcing strategy that is known and implemented throughout the company. OLYMP has two different supply chains and therefore two sourcing strategies in practice. One is OLYMP BEZNER KG sourcing for regular volumes and the other is OLYMP Retail KG sourcing smaller volumes for the retail stores. Both strategies address influencing labour conditions and will be streamlined and unified in the near future. The brand's overarching strategy is to consolidate and build long-term partnerships with its suppliers, avoid supplier switching, and understand its suppliers' mindset. Furthermore, the brand excluded sourcing from Myanmar and Xinjiang province in China. The member brand has not yet included active cooperation with other buyers in its sourcing strategy.

Although the member has marked 51 suppliers as active, only 43 suppliers were actively producing and the FOB and leverage were provided. 79% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. This percentage has decreased by 8% in comparison to the previous financial year due to adding its OLYMP Retail supply chain to this performance check. 14% of the production volume comes from suppliers where OLYMP buys less than 2% of its total FOB.

Recommendation: Fair Wear recommends OLYMP to have its sourcing strategy in writing as a separate document from its Responsible Business Conduct (RBC) policy.

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

Fair Wear recommends the member to include SMART goals in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	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.	2	6	0

Comment: OLYMP has a sourcing strategy in practice that focuses on maintaining long-term relationships. 91% of the member's total FOB volume comes from suppliers with whom OLYMP has a business relationship for at least five years. However, the member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends OLYMP to commit to long-term 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.	Basic	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.	2	6	-2

Comment: OLYMP conducts risk scoping based on the OECD Due Diligence Guidance. Risk scoping covers all levels (sector and country risks, raw material risks, supplier risks, product, risks, and business model risks). In its risk scoping, the member has assessed the impact and prevalence of all risks. The rating for each risk is given by a severity rating (1-5 highest) and a rationale. The risk analysis is updated regularly. For the member brand, it is an ongoing process to further strengthen the brand's human rights due diligence by better linking the different elements of its product and country-specific risk assessment. The member occasionally adjusts its sourcing strategy based on the risk scoping. In 2022, the member brand started sourcing products from Türkiye due to the country's proximity and fast lead times. However, the country risk assessment for Türkiye does not include the country's typical risks such as Syrian refugees and subcontracting. The risk scoping misses a gender lens across all risks, but the risks of sexual harassment, gender-based violence, and equal pay are included. To date, OLYMP has no written sourcing policy that mentions a preference for countries where workers can freely form or join a trade union and/or bargain collectively. OLYMP sources in China and has included the risk to forced labour in its risk scoping.

The member brand is sourcing through an intermediary in Ukraine, which has the highest country risk score in its risk assessment. The member brand shared the heightened due diligence with its intermediary. The factory location is considered safe and the member brand did not cancel or postpone any orders. Regarding China, the member has stopped onboarding new suppliers.

Recommendation: Fair Wear strongly recommends OLYMP 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.

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.	Advanced	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.	4	4	0

Comment: It is the standard process for OLYMP to inform new suppliers about Fair Wear membership and the commitment to improve workers' conditions by sharing the OLYMP onboarding manual and during the annual factory visits. The OLYMP supplier onboarding process is divided into three phases and Fair Wear requirements are shared with the supplier in phases one & two. The member discusses and shares with each new supplier the Code of Labour Practices (CoLP), and relevant policies such as subcontracting policy, and the supplier is asked to post the Worker Information Sheet (WIS). This process has been followed for all nine suppliers added last year (four in Türkiye, one subcontractor in China, one in Sri Lanka, one in Bangladesh, one in Bulgaria, and one in Portugal). OLYMP also started a dialogue with all its new suppliers about human rights and how they can cooperate on this topic. The process is documented in the member's internal system and shared with the relevant departments such as purchasing, and CSR.

Recommendation: Fair Wear recommends that OLYMP continues and engage in a dialogue with the supplier about Fair Wear requirements and how to cooperate in implementing these.

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: OLYMP collects human rights information from potential new suppliers through collecting specific topic questionnaires, Fair Wear questionnaires, training, and its iMPACT Program Audits. In addition, the member reviews country-specific risks, gathers information from NGOs and local stakeholders, consults with trade unions, and has CSR staff visit its suppliers. The member has added new production locations in countries Türkiye, China, Sri Lanka, and Bulgaria, which are countries with restrictions on the ability of workers to freely form or join trade unions. Furthermore, the member brand onboarded a new supplier, which was exited due to human rights information. This information should have informed a decision-making process before onboarding.

OLYMP collected questionnaires and Worker Information Sheet (WIS) for its active suppliers. However, the member brand did not manage to collect those documents from three suppliers, where only a trial order was placed, and the business relationship ended.

Recommendation: Fair Wear strongly recommends OLYMP to privilege suppliers where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

Fair Wear recommends OLYMP to collect existing audit reports and request additional information from the supplier to collect enough information for the decision-making process when onboarding a new supplier.

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.	Insufficient	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.	0	6	0

Comment: OLYMP has added nine new production locations in Türkiye (four of which one is only a trial), China (one subcontractor), Bangladesh (one supplier - currently exiting), Sri Lanka (one as a trial order), Bulgaria (one subcontractor) and Portugal (one as a trial order). The brand has shared information about Fair Wear's Code of Labour Practices (CoLP) and the complaints helpline within the first year of doing business. The Worker Information Sheet (WIS) has been posted for most of the suppliers. The CSR staff distribute the Worker Information Card (WIC) during the visits to workers and verify if the WIS is hanging. OLYMP has not yet organised an onboarding session for the workers and management of its suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue. The member brand could not show that the supplier questionnaire was sent to all new suppliers, and it could not show that all new suppliers posted the WIS.

Requirement: OLYMP must ensure that factory management is aware of the Fair Wear CoLP and the complaints helpline within the first year of starting the business. The Worker Information Sheet needs to be posted at a place easily accessible for workers.

Recommendation: OLYMP is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business.

Fair Wear recommends OLYMP to check whether the worker information sheet is posted at a location 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: OLYMP has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for its already active suppliers. As for the newly added suppliers in 2022, informal evaluations on such risks were carried out. OLYMP has determined the appropriate monitoring tool and frequency per country or outcome of the risk scoping. Together with another Fair Wear member brand, the brand has its iMPACT Program, which consists of audits. Brands can easily adapt the audits to country or supplier-specific risks. Over the past two years, the member has monitored its suppliers through various audits, five of which have been through the iMPACT Program audit conducted in 2022.

OLYMP sources predominately from countries Indonesia, Bangladesh, and Vietnam, and monitors its suppliers with a higher risk of limited Freedom of Association (FoA) by conducting monitoring audits, visits, and surveys, sharing FoA checklists, and collecting supplier questionnaires.

Recommendation: Fair Wear recommends OLYMP to assess whether the member causes, contributes, or is linked to the identified risks.

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).	Intermediate	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.	4	6	0

Comment: OLYMP has mapped and included the risks to Freedom of Association (FoA) in its country and supplier risk scoping and can explain the key risks per country, including the risks to female workers. It uses this information to understand the risks at its suppliers. The member brand identified risks to FoA and collective bargaining at its suppliers for the countries Ukraine, China, Vietnam, Bangladesh, and Türkiye. However, this risk to FoA is not identified for India.

The brand collects information through its audit programme with a set of questions on FoA and the worker sentiment survey. The worker sentiment survey is a tool to collect feedback from workers.

Recommendation: OLYMP is recommended to join a multi-company CBA if possible.

The member is recommended to ensure supplier-level monitoring is in place to assess and understand the risk at suppliers - for example, through the Supplier Questionnaire (tool 2 in Fair Wear’s FoA Guide), modular assessment on Social Dialogue, in-depth discussions with suppliers, or a full audit.

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.	Intermediate	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.	4	6	0

Comment: OLYMP could show it understands the gender risks for its sourcing countries. OLYMP collected gender-related information through its worker sentiment survey as part of the factory audit. The worker sentiment survey includes a gender lens on several Codes of Labour Practices (CoLP) and collects data such as verbal abuse, physical and verbal harassment, equal treatment, and grievance mechanisms (by gender). In 2022, the member brand collected this data for its four suppliers (India, China, North Macedonia and Türkiye). All collected data on gender are included in the country risk assessment as risk factors on gender (male/female), discrimination, and gender-based violence. The member brand is currently further developing its iMPACT Program with a gender lens. The gender lens should be part of each CoLP.

The member has not yet analysed how its business practices affect gender at its suppliers.

Recommendation: Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices. Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear’s gender instruments can be helpful.

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.	Insufficient	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.	0	4	0

Comment: OLYMP did not evaluate human rights performance in a systematic way. The member brand started to develop its supplier's human rights evaluation since the last performance check. Because of its internal data system change, it can be only implemented in 2024. Nevertheless, the brand evaluates its supplier's performance in an informal way, covering price, quality, delivery time, and working conditions. The evaluation of suppliers is a joint effort between the purchasing, quality, and CSR departments. This supplier's performance in improving working conditions is occasionally taken into account in the brand's decision-making process. One newly onboarded supplier in Bangladesh was exited based on the assessment of human rights conditions. In addition, the member brand has not yet developed specific incentives that fit its business model.

Requirement: The member needs to evaluate the human rights performance of its suppliers systematically.

Recommendation: Fair Wear recommends the member to ensure that the evaluation of human rights performance of its suppliers is systematically considered in purchasing decisions. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

Fair Wear recommends OLYMP to share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives.

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.	Advanced	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.	4	4	0

Comment: OLYMP uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. OLYMP recognises that its sourcing model (use of intermediaries) presents a high risk of unauthorised subcontracting. Each new production facility must be pre-approved by OLYMP before sample processes and bulk production. Before entering into a business relationship with OLYMP, business partners and production facilities commit to the following requirement: If a direct business partner transfers production processes, without informing and awaiting the approval of OLYMP, it is considered an 'unauthorised subcontracting' because the subcontracted production facilities and workplaces are not formally part of its supply chain. Unauthorised subcontracting may lead in the worst case to the end of business relations. The member brand has quality check staff present at four of its five main suppliers that actively checks for subcontracting through in-line inspections. When OLYMP's CSR staff visits the factory, it checks factory inspection reports on-site and compares them to what was ordered. Furthermore, the brand aims to visit all factories once a year, especially when production takes place.

The member brand detected two cases of unauthorised subcontracting and excluded the concerned factories from its supply chain.

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: OLYMP has identified whether homework is prevalent in its sourcing countries. According to the member, the risk of homeworkers being used by its suppliers is very low due to its monitoring controls and the technical nature of the product. Monitoring takes place through audits (including five additional questions on homeworkers), visits by OLYMP's CSR staff, and on-site quality control teams. The member brand has discussed this issue with its suppliers and it is included in the risk scoping for monitoring. However, the member brand has not yet carried out a capacity analysis of specific production processes to validate that no homeworkers are used.

Recommendation: Fair Wear recommends OLYMP 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: OLYMP has agreements with its suppliers through its newly developed onboarding manual and in the form of purchase orders, which stipulate terms of payment, delivery agreements and product specifications. The member does not have a contract including liabilities and shared responsibilities with its suppliers.

OLYMP uses two ways of payment. One is a 'letter of credit', which allows the supplier to open its letter with the bank when the goods are leaving or ask for pre-payment before the order is finished when needed. The other payment method is 'LC and T/T payment at sight', which is a telegraphic payment transfer when the goods are leaving the production country. Since the last performance check, the member brand has been working on developing a new contract framework that will improve and include the Code of Labour Practices (CoLP).

Recommendation: OLYMP 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. A summary of every audit and visit is shared with the Director of Supply Chain, Manufacturing Consulting, and related Procurement Department.

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

OLYMP could include responsible business practices in its job role competencies of sourcing and purchasing staff.

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: OLYMP developed its internal guide 'No Excessive OT Guide' and collects monthly overtime (OT) reporting from its suppliers. The member knows a supplier's production capacity and shares with the supplier forecasts or production planning that have been developed by different departments. In addition, the member communicates and collaborates with its suppliers on the permanent reservations and utilisation of the production. The last phase is sharing forecasting and production planning. Production planning starts 14-18 months with capacity planning. Orders are placed 7-12 months in advance. OLYMP nominates the material suppliers and takes lead time for fabric delivery into account when planning production. In case any delivery delay occurs, the member brand discusses the cause with the supplier and gives an additional one to two weeks to deliver. The supplier is also given a period of four weeks and can choose the style to produce in the most efficient order related to any needed adjustments in the machinery park. In case the supplier is not meeting the agreed deadline and the delivery is shifted to air, the supplier will pay for the air transport. However, the member brand has not yet explored the production planning in minutes instead of pieces to assess better its supplier's production capacity and it has not yet connected with other suppliers to learn about their production planning.

Recommendation: Fair Wear recommends the member to explore planning production in minutes instead of pieces to assess better its suppliers' production capacity (and wage levels). Furthermore, at suppliers where OLYMP is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season.

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.	Basic	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.	2	6	0

Comment: OLYMP has a good understanding of the wage levels at its suppliers and connects this understanding to its buying prices. OLYMP has an overview of wage levels at suppliers to verify whether legal minimum wages can be met at its production locations. The member brand has started working with some form of fact-based pricing, including inflation, raw material, energy, and other cost increases for most of its styles. It collects workers' wage data from each supplier to check whether a legal minimum wage has been paid. It also uses this data to conduct a wage gap analysis to measure the wage gap between the lowest wage paid in its production partners' factories and the living wage benchmarks. Although the brand has taken some steps, it needs to find a way to work on open costing with its suppliers.

Recommendation: OLYMP is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown, for example using the Fair Price app.

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.	Advanced	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.	4	4	0

Comment: OLYMP uses ten intermediaries. The member brand has informed its sourcing intermediaries of the Fair Wear requirements and has been able to demonstrate that they have informed the production sites. Some of the intermediaries have on-site teams to check product quality. All intermediaries are also involved in the Corrective Action Plan (CAP) follow-up and remediation process. They accompany CSR staff on visits to suppliers and a report of the visit is shared with them.

Layer 3 Prevention, mitigation and remediation

Possible Points: 96

Earned Points: 34

Indicators on the quality and coherence of a members' 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: Based on the risk identification as described in chapter two, OLYMP has linked factory risks to appropriate follow-up for factories covering 55% of FOB. The member uses mainly its recent Corrective Action Plans (CAPs) from the iMPACT Program and third-party audits, factory visits, and surveys to define the follow-up remediation plans for each supplier. The member prioritised follow-up remediations on health and safety and wages and benefits.

The member brand started to use isotope analysis to verify the cotton origin. One supplier in Türkiye received the Fair Price App training as a follow-up on the Living Wage remediation. The member brand is yet to complete its follow-up plans for the living wage and access to Freedom of Association (FoA).

OLYMP sources from six production locations in Bangladesh, responsible for 27% of the member brand's total FOB. The member has signed the International Accord.

Recommendation: Fair Wear recommends the member to further complete/improve its follow-up plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Insufficient	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.	0	6	0

Comment: OLYMP collects some data on gender through its audits and its employee surveys. In 2022, the member brand has completed the gender sensitive maps, including a general overview and data per factory. During the CSR staff visits the member brand discusses gender topics and gender related issues. No further remediation or prevention steps were defined. Though the member started collecting gender disaggregated data, OLYMP has not yet included a gender lens in its action plans per supplier. One of the six suppliers in India was enrolled in Fair Wear's Violence and Harassment Programme.

Requirement: OLYMP must start including a gender lens in the implementation of improvement or prevention actions.

Recommendation: OLYMP could extend its gender lens to follow-up on both improvement and prevention 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: OLYMP has partially included measures to promote Freedom of Association (FoA) and social dialogue in action plans, for example, training for workers and management on social dialogue. However, this and other preventive measures have not yet been implemented.

Recommendation: Fair Wear recommends OLYMP to be more comprehensive and include more steps to promote FoA and effective social dialogue in its improvement and prevention actions.

OLYMP 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.

Fair Wear recommends OLYMP to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

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: Suppliers' internal grievance mechanisms are assessed at the beginning of the relationship and monitored through the audit programme, which includes a worker sentiment survey with questions on the internal grievance mechanism. During the CSR staff visits the member brand discusses internal grievance mechanism and distributes Worker Information Cards (WIC). OLYMP does not yet support the effectiveness of internal grievance mechanisms by organising training modules for workers and worker representatives or through actively incorporating its monitoring results into improvement and prevention plans.

Recommendation: Fair Wear recommends OLYMP to always involve suppliers and worker representatives in the assessment of the internal grievance mechanism, and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved.

Fair Wear recommends OLYMP to respond when internal grievance mechanisms are not functioning.

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.	Intermediate	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.	4	6	0

Comment: OLYMP cooperates with several other Fair Wear members at its shared suppliers, responding to CAPs and complaints. OLYMP has not yet cooperated with customers who are not Fair Wear members. However, the brand shares more suppliers with Fair Wear members, where cooperation has yet to start. Next to that, the member brand also cooperates in taking more preventive measures, such as organising training (Fair Price app and Fair Wear's Violence and Harassment Programme) and joint living wage work. In addition, OLYMP actively cooperates with another Fair Wear member in its iMPACT Program but does not share production facilities with this member.

Recommendation: Fair Wear recommends OLYMP to expand its cooperation to all Fair Wear member brands at its shared suppliers. Fair Wear encourages OLYMP to also collaborate with other customers.

Indicators on implementation: 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.	50%	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.	4	6	-2

Comment: In the past financial year, nine monitoring audits in total were conducted of which five were iMPACT Program audits. During the performance check, the member could demonstrate that up to two-thirds of the Corrective Action plan (CAP) issues requiring actions have been followed up. The member followed up on corrective actions related to findings on health and safety, violence and harassment, and wages and benefits in India, China, and Bangladesh. OLYMP has been able to demonstrate that its suppliers have worked on several issues that have been addressed. However, more complex issues such as payment of the living wage, social security payments, access to FoA, and worker representation remain outstanding.

Recommendation: Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of OLYMP to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the resources needed to be able to work on improvement actions.

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: OLYMP has identified the root causes of some CAP issues, such as violence and harassment. Therefore, a Worker Education Place (WEP) training on Violence & Harassment Prevention was conducted at one supplier in India. Based on the brand's risk assessment OLYMP is a signatory to the Accord to address the root causes of occupational health and safety issues at its suppliers in Bangladesh to prevent their reoccurrence. OLYMP has identified some of the root causes of the CAP issues and discussed these with its suppliers. The member has identified two main causes of several of the CAP findings, particularly in relation to wages and benefits.

Recommendation: Fair Wear recommends OLYMP to identify the root causes of CAP issues together with its suppliers.

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.	Basic	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.	2	6	0

Comment: OLYMP has four suppliers where improvement or prevention steps are not needed. These cover 0,8% of the member's total FOB. OLYMP regularly reviews changes to the risk situation. The member irregularly checks and discusses possible human rights risks at those suppliers. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

Recommendation: OLYMP is recommended to create a systematic plan which details at which interval the member will discuss possible human rights risks at its suppliers and which human rights risks should be discussed.

OLYMP is recommended to ensure worker representation/local unions (when appropriate) are included in discussions with factory management on possible human rights risks.

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 four audits reported excessive overtime. According to the audit finding at the supplier in Bangladesh, selected workers (selected samples) did not have one day off in a week in August and December as required by law. The member brand discussed this finding with the factory management and concluded that inappropriate production planning was the root cause. The member brand worked together with the factory on production planning to avoid excessive overtime work. In addition, OLYMP regularly collects detailed insights into the working hours of all factory workers in its shirt supply chain. These reports include overtime hours per month per department. The member brand hasn't yet collected detailed insights into the working hours of the rest of its suppliers.

Recommendation: If audits are not possible, OLYMP could use alternative monitoring tools such as worker surveys to investigate working hours.

Fair Wear recommends cooperating with other customers at the factory to increase leverage when mitigating excessive overtime.

With its suppliers where excessive overtime occurs, Fair Wear recommends OLYMP 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.

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.	Intermediate	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.	2	4	-2

Comment: One of the audit reports from a supplier in Türkiye reported a finding on wages and benefits. According to the audit findings, the total payment amounts were not fully reported to the Social Security office. Part of the wages, other than the minimum wage, is paid unofficially in cash. When OLYMP contacted the factory, the factory responded that this is a fundamental problem in the country and a common practice among suppliers. Although followed up by the member brand, no specific remediation plan has been developed yet and the issue remains unresolved. The member brand is yet to follow up on this finding.

Another audit finding was reported for a supplier in Bangladesh. According to the audit findings, the factory did not pay contract workers overtime compensation for night and weekend work as required by law. In addition, the factory did not pay any overtime compensation to workers who worked less than 29 minutes of overtime. The member has discussed the findings with the supplier, and the compensation for night and weekend work was corrected and paid as required by the law. The OLYMP's CSR staff checks regularly the payrolls to verify the overtime payments.

OLYMP followed up on the previous requirement and conducted a wage supplier survey at its all suppliers. According to the supplier, mentioned in the previous performance check, the supplier did follow the legally required minimum wage payment and overtime hours.

Recommendation: Fair Wear urges the member to develop a remediation plan with the Turkish supplier. Fair Wear recommends OLYMP to not only ensure that findings such as social security payments and incorrect calculations have been resolved but also double check if afterwards the calculations were done correctly. To verify this, OLYMP could request a modular assessment at Fair Wear to verify the wage calculations and payments.

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.	Basic	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.	2	6	0

Comment: OLYMP has an overview per supplier in place of legal minimum wage benchmarks, lowest factory wage versus living wage benchmarks, and the gap between the two. The overview is updated regularly. As a first step, OLYMP tries to understand the wage gap. The second step is understanding the wage component and linking it to the brand's purchasing practices, and lastly introducing the Fair Price app to its suppliers. After its first performance check, OLYMP embedded a wage assessment in its iMPACT Program audit to collect and communicate appropriate data on workers' wages. The member has not yet conducted a detailed analysis of the root causes of the non-payment of living wages per supplier. Discussions have been held with one of its suppliers in Türkiye, together with another Fair Wear member, on the root causes of wages below the living wage.

Recommendation: Fair Wear encourages OLYMP to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

Fair Wear encourages OLYMP to involve worker representatives and local organisations in assessing the 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.	Insufficient	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.	0	6	0

Comment: OLYMP does not have a strategy on how to finance wage increases at its suppliers yet. OLYMP has had an intern writing a paper on a living wage, which provides the basis for the next steps.

Requirement: OLYMP should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: Fair Wear recommends OLYMP to enrol in the Living Wage programme on Fair Wear's learning platform. 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. It is advised that the strategy for how to finance wage increases is agreed upon by top management.

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.	0%	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.	0	6	0

Comment: OLYMP does not contribute to higher wages at any of its production locations.

Requirement: OLYMP is expected to begin setting a specific benchmark wage for its production locations.

Recommendation: Fair Wear recommends OLYMP to conduct a root cause analysis to check how it is possible that the paid wages are not above a living wage benchmark while the brand calculates with this benchmark in its pricing and has high leverage.

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.	Intermediate	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.	2	4	-2

Comment: OLYMP received one complaint in the past financial year about safe & healthy working conditions and legally binding employment relationships at its supplier in Türkiye. The member actively responded to these complaints as per Fair Wear's Complaints Procedure, in collaboration with other Fair Wear members.

Another Fair Wear member brand had the lead for this complaint. The member brand visited the factory and discussed the complaint in detail with the factory management on behalf of all active Fair Wear member brands. Since the factory made proper remediations, this complaint was resolved.

OLYMP did not yet include the outcome of this complaint to decide on follow-up in its human rights improvement and prevention plans.

Recommendation: OLYMP could use the outcome of complaints to determine follow-up actions in its broader improvement and prevention plans. The member is recommended to take steps to prevent similar complaints from occurring in its supply chain.

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: OLYMP has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on violence and harassment, living wage payment, and grievance mechanism and communication in the following modules: WEP Violence & Harassment Prevention training at one supplier in India. A Fair Price app training at one supplier in Türkiye.

Recommendation: OLYMP is recommended to implement training for all factories where this is part of its improvement and/or prevention programme.

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: WEP Violence & Harassment Prevention training and Fair Price app training were organised, the member received reports that included follow-up, and the member has partly carried this out. OLYMP addressed and discussed training results with the factory management. The member has not yet used the results of the training as input for its human rights risk monitoring.

Recommendation: Fair Wear recommends OLYMP use the training results as input for OLYMP's 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.	Intermediate	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.	2	4	0

Comment: In 2020, OLYMP terminated a business relationship with a supplier (Croatia) where it had a significant leverage of 75%. The supplier went bankrupt in 2021, and severance pay and legal fees had to be paid to all factory workers. This payment has been split into two parts. The initial payment was made in autumn 2021, and the trade union representing factory workers, who were involved in negotiations, confirmed that the second payment was fulfilled in April 2023. OLYMP provided the evidence confirming workers' payment.

Although the severance payment was paid, it was done with a delay that might have caused some financial difficulties for the affected workers. Both tranches were paid by the Government, who was the owner of the factory.

OLYMP had dialogue with the Croatian government, the insolvency intermediary, trade unions (Novi Sindika, TOKG and IndustriAll) and other stakeholders to take the next steps with payment of severance. The brand did, however, not reach out to the workers or the former trade unions to offer financial support to the workers during the time that severance had not been fully paid.

Since the workers received their severance payment, this requirement from the previous performance check is solved.

Recommendation: OLYMP could discuss the responsible exit strategy with its suppliers, for instance 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: OLYMP 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: 22

Earned Points: 14

Indicators related to communication

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: OLYMP communicates accurately about Fair Wear membership on its website. The member brand communicates about Fair Wear on its website, social media platforms, and its sustainability report. However, the brand has not yet developed flyers or presentations to actively promote and disseminate the Fair Wear message to its retailers.

Recommendation: OLYMP 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: OLYMP does not sell external brands.

Indicators related to brand and supply chain transparency

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.	Advanced	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.	4	4	0

Comment: OLYMP has submitted its social report, which Fair Wear approved. OLYMP has also published the report on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	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.	2	4	0

Comment: OLYMP published its social report on its website. Though OLYMP publishes its social report and its factories on its website, it does not yet publish timebound action plans.

Recommendation: Fair Wear recommends OLYMP to publish time-bound plans for its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	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.	4	6	0

Comment: OLYMP has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. This internal evaluation system involves the CEO and top management, and strategic decisions regarding sustainability are made during these meetings. However, the current evaluation system does not yet incorporate triangulated feedback from external sources, such as workers and suppliers.

Recommendation: The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Intermediate	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.	2	4	-2

Comment: In the previous performance check, the following requirements were included: 3.9 Degree to which member company mitigates root causes of excessive overtime; 2.16 Member company can demonstrate the link between its buying prices and wage levels in production locations and 3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify legal wage requirements are paid. Together, at least half of the requirements were addressed.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Yes

Comments: OLYMP has issued a public response on social media to address allegations regarding the OrLjava factory, in order to provide clarification for its customers, partners, and NGOs.

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

What is positive Fair Wear is engaging in the broader approach through The Industry We Want (TIWW).

Nevertheless, Fair Wear should be practical:

- The OLYMP risk analysis has shown different risks than the focus topics of Fair Wear. Brands need more flexibility to work on their own risks rather than the Fair Wear-dictated topics. This is a contradiction to the OECD guidelines.
- The recommendation is not only about the German Supply Chain law but all upcoming EU laws, especially the CRSD. Reduce bureaucracy by aligning with all (upcoming) EU laws.
- The Fair Wear social report should be aligned with the CRSD and other reporting directives by the EU, to avoid double work.
- Fair Wear can conduct a Performance Check once in two years; one year by publishing a social report and the next year having a performance check.
- Lack of communication from FWF.
- Fair Wear can help more with sectoral & country risks.
- The role of a brand liaison is a tick-boxing exercise; we suggest more consistency and a better understanding of the member brand assigned.
- Keeping the notes together - brand liaison and member brand.
- Suggestion of having the same performance checker for several consecutive years.

Brand Performance Check details

Date of Brand Performance Check: **06-07-2023**

Conducted by: **Terezia Haselhoff**

Interviews with: CEO & owner: Mark Bezner

Corporate Responsibility Manager Social Compliance: Helen Zitzelsberger

Director Operation & Purchase: Johann Trischberger

Deputy head CR, strategy & communication: Ilyta LaCombe

Head of Purchase Retail KG: Brian Randecker

Finance: Bianca Deuring