



Brand Performance Check

Blutsgeschwister GmbH

Publication date: June 2024

This report covers the evaluation period 01-01-2023 to 31-12-2023

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: 150

Possible score: 204

Benchmarking Score: 74

Performance Benchmarking Category: Leader



Foundational system's criteria

100%



Sourcing strategy

59%



Identifying continuous human rights risks

73%



Responsible purchasing practices

77%



Quality and coherence of prevention and remediation system

67%



Improvement and prevention

77%



Communication, transparency and evaluation

91%

Summary:

Blutsgeschwister GmbH (Blutsgeschwister) has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 74, the member is placed in Leader category.

Blutsgeschwister's sourcing strategy shows the company's commitment to long-term relationships and jointly improving labour conditions. In addition, the brand's strategy is to onboard only new suppliers committed to human rights and improving working conditions.

Blutgeschwister developed a risk analysis matrix in line with the OECD requirements, focusing on all kinds of risks, including environmental ones. Blutgeschwister uses this matrix to prioritise risks in its supply chain, using a traffic light system to indicate low, medium and high risks. The brand's robust and systematic supplier evaluation system includes CSR indicators and is shared with suppliers. Blutgeschwister uses the evaluation systematically to strengthen its CSR action plan.

In 2023, Blutgeschwister adjusted further its sourcing strategy to reduce human rights risk in its supply chain. In particular, the brand has decided to source only from suppliers committed to human and labour rights and to phase out countries that do not endorse freedom of association and have a higher risk of forced labour. Blutgeschwister has also collected and analysed gender-disaggregated wage data and discussed it with some suppliers.

Blutgeschwister's framework agreement enables objective price negotiations with suppliers by ringfencing labour cost, which is a vital part of the payment of living wages. The brand makes prepayments of 30% - 50% of the order amount to reduce its suppliers' risks and financial burden.

Blutgeschwister improved its practices to ensure they align with the OECD guidelines on Human Rights Due Diligence (HRDD) and seems well-placed to strengthen its practices further in the coming years.

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 member brands. Because of this transition, Fair Wear temporarily lowered the scoring threshold.

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 Blutsgeschwister GmbH

Member company information

Member since: [1 Jan 2013](#)

Product types: [Garments, clothing, fashion apparel and Bags](#)

Percentage of turnover of external brands resold [0%](#)

FLA Member [No](#)

Member of other MSI's/Organisations [Partnership for Sustainable Textiles, GOTS,](#)

Number of complaints received last financial year [0](#)

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
India	8	38.4%
China	6	34.72%
Türkiye	6	13.11%
Lithuania	1	10.1%
Portugal	3	2.9%
Viet Nam	1	0.75%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: [Yes](#)

Comment: [Blutsgeschwister](#) has a Human Rights Due Diligence policy, but some elements, such as information regarding home workers and the member brand's realisation of a responsible purchasing practices policy, need improvement. [Blutsgeschwister](#) has published its Human Rights Due Diligence policy.

Requirement: [Blutsgeschwister](#) needs to improve its Human Rights Due Diligence policy to ensure better alignment with the OECD guidelines.

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [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: Blutsgeschwister discloses 88% 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: Blutsgeschwister discloses 88% 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: 62

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: Blutsgeschwister has a sourcing strategy addressing influencing labour conditions. The member has 25 active suppliers. 45% of the production volume comes from suppliers, where the member has at least 10% leverage at suppliers. This percentage is 8% less than the year before. 3% of the production volume comes from suppliers, where Blutsgeschwister buys less than 2% of its total FOB. The member brand has a consolidation plan in its sourcing strategy. In the last financial year, Blutsgeschwister added eight new suppliers due to privileging countries where Freedom of Association is allowed. Blutsgeschwister reached out to its suppliers to see if they are open to share their customers so that Blutsgeschwister can cooperate with them.

Recommendation: Blutsgeschwister 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: Blutsgeschwister has a sourcing strategy that focuses on maintaining long-term relationships. 54% of the member's total FOB volume comes from suppliers with whom Blutsgeschwister has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Blutsgeschwister 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.	Advanced	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.	6	6	-2

Comment: Blutsgeschwister conducts risk scoping every year and includes all 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 risk scoping includes a gender lens. The member particularly looks at the prevalence of gender-based violence in its sourcing countries. Input from workers, suppliers, and stakeholders is included in the risk scoping by factory assessment reports, surveys and personal exchanges during visits. The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding ending the collaboration with a supplier from Türkiye due to lack of willingness to work on HRDD. Besides, Blutsgeschwister consolidated its supply chain in China. Additionally, Blutsgeschwister's sourcing strategy privileges countries where workers can freely form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear recommends Blutsgeschwister to further improve the gender lens in its risk scoping.

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 Blutsgeschwister to inform new suppliers about its HRDD policy and Fair Wear membership by sharing information via email and meetings (e.g., Code of Conduct, company's core values, etc.). The brand generally tries to visit all (new) suppliers before finalising the first purchase order. The CSR manager generally visits (new) suppliers if they are based in high-risk countries and discusses sustainability topics with factory management; in low-risk countries, the CSR manager does not always visit the (new) suppliers, but other colleagues (e.g., from the sourcing and product departments) are asked to discuss sustainability topics with management. If the new suppliers are subcontractors, the intermediary or the main factories must inform them about Blutsgeschwister's core values and sustainability goals. This process has been followed for almost all new suppliers added last year. The brand chooses only suppliers that have already started improving human rights, as this process is considered more efficient for long-term and sustainable change.

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: Blutsgeschwister collects human rights information of potential new suppliers by collecting self-assessments, existing audit reports and conducts online meetings and/or in-person visits. Blutsgeschwister did not receive the signed questionnaire with the Code of Labour Practices from a subcontractor and a supporting process supplier. These two suppliers were connected to a main supplier, with whom Blutsgeschwister started cooperation. The member brand adjusted its sourcing and ended the collaboration with the main supplier and the connected suppliers due to transparency issues. The company collects information from workers or stakeholders to inform the sourcing decision if assessment reports are available. Moreover, Blutsgeschwister’s sourcing strategy privileges suppliers where workers are free to form a trade union and/or bargain collectively. Blutsgeschwister followed this process mainly for the suppliers added in the previous year.

Recommendation: Fair Wear recommends that the member discusses the content of the CoLP and requests evidence that confirms the supplier’s support of the CoLP. Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, 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: Blutsgeschwister has added eight new suppliers. The main reason is the partial allocation of production from China to Türkiye. Blutsgeschwister has shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The Worker Information Sheet has been posted. One supporting processes supplier did not post the Worker Information Sheet, and the member brand ended the cooperation with the main supplier. Blutsgeschwister organised only one onboarding session for workers and the management of one new supplier. The member organised these sessions to raise awareness about the Fair Wear CoLP and the grievance mechanism. Blutsgeschwister has yet to organise onboarding sessions for all of its new suppliers to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue.

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

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 assess human rights risks in its production locations.	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: Blutsgeschwister has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tool and frequency per country (or outcome of the risk scoping). For instance, the brand assesses human rights risks in its production locations in Türkiye, China and India by enrolling them in full assessments and organising monitoring visits and/or training. Blutsgeschwister plans to use more modular assessments. The tools that Blutsgeschwister uses for its risk assessment do not explicitly include worker, stakeholder and/or supplier input (unless it is a Fair Wear audit).

Recommendation: Blutsgeschwister could complement its risk assessment process with worker, supplier, and stakeholder input.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process includes an assessment of freedom of association (FoA).	Advanced	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.	6	6	0

Comment: Blutsgeschwister can demonstrate advanced knowledge and understanding of FoA in all countries where it sources. The brand is aware that China has extensive Freedom of Association rights only on paper, as workers cannot freely form or join a trade union of their choice. Even when possible, these trade unions depend on the stated-based trade union. Blutsgeschwister knows that Freedom of Association is only partially allowed in India. Nonetheless, one of the brand's suppliers has functional workers' committees in place (this was checked during visits). This factory also has one collective bargaining agreement in place. The member brand has also assessed a higher risk of FoA in Türkiye. Blutsgeschwister uses the Fair Wear's Supplier Questionnaire on FoA to ensure supplier-level monitoring of the risk of violations to FoA. Blutsgeschwister can explain the main risks of violations to FoA at all its suppliers, including the risks specific to women workers. The member brand knows which suppliers have trade unions and CBAs in place.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, 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: Blutsgeschwister has included gender in its human rights risk identification. The member could show it understands the basic gender risks for its sourcing countries. The brand identified gender-based violence as an important risk prevalent in India and discriminatory hiring practices in China and India. Blutsgeschwister collected gender-disaggregated wage data at some of its main factories to assess if there is gender-based wage discrimination. The brand has also analysed these data, and the main conclusions (so far) are as follows: some job categories are male- or female-dominated. Male-dominated workers are generally paid better, and workers who perform these jobs have a higher social status. The brand has also discussed these results with factory managers to assess the root causes.

Recommendation: Fair Wear recommends Blutsgeschwister 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.	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: Blutsgeschwister has a strong and systematic evaluation system for assessing suppliers' human rights performance. In particular, the member brand systematically evaluates its suppliers' performance after each season. CSR compliance is evaluated together with other indicators. All the departments at Blutsgeschwister, including top management, meet to discuss the results shared and discussed with suppliers. Blutsgeschwister has not yet shared the outcome of the evaluation with the worker representatives of its suppliers. Occasionally, the outcome of this evaluation influences purchasing decisions. Blutsgeschwister consolidated its supply chain due to the non-willingness of a supplier to improve.

Recommendation: Fair Wear recommends the member to ensure that the evaluation of human rights performance of its suppliers is systematically considered in purchasing decisions.

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: Blutgeschwister uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting (if any). No factory assessment revealed unauthorised subcontracting, and there is no evidence of first-tier locations missing in the database. The member takes measures to prevent unauthorised subcontracting or unknown locations, such as contract clauses, visits during production, and a forecast system that helps suppliers plan their capacity needs. Blutgeschwister has also taken steps to get transparency deeper in its supply chain. In particular, the brand collects information beyond tier one of its supply chain by collecting information on the cotton mills, embroidery and trim locations with supplier's support.

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: Blutsgeschwister has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because the embroidery for its products has to be done by machine. Blutsgeschwister knows which suppliers use homeworkers and started collecting information by sending out a questionnaire on home-based work to all its suppliers - if there is a risk of exploitation or not.

Recommendation: Blutsgeschwister is recommended to ensure suppliers that work with homeworkers do so in a responsible way.

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.	Intermediate	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.	2	4	0

Comment: Blutsgeschwister uses framework agreements with its suppliers. The member has agreements in the form of a delivery framework and a supplier manual that stipulate terms of payment, liability and penalties. Payment terms are 30% to 50% of the total FOB shall be paid with the order placement, and the rest of the final invoice shall be paid on the day of shipment. The framework agreement stipulates that in case of delivery delays, Blutsgeschwister has the right to charge the supplier a discount. In contrast, the agreement does not mention proof of fault by the supplier. Additionally an unequal burden is placed upon suppliers by holding them financially responsible for defects without proof of fault. The framework agreement and the supplier manual partly support human rights due diligence by setting open costing as the standard procedure to determine the price. It is clearly stated that labour costs and supplier's margin cannot be negotiated.

Recommendation: Fair Wear strongly recommends that Blutsgeschwister remove penalties for late delivery from its contracts or at least ensure there is 'proof of fault by the supplier'. Blutsgeschwister 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 its decision-making processes.	Advanced	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.	6	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, considering the HRDD policy and target wages are included in the job description of sourcing staff. Sourcing and purchasing staff work with Key Performance Indicators (KPIs) supporting good sourcing and pricing strategies. Examples of these KPIs are preferring sourcing countries with lower FoA risk and working towards living wages.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Advanced	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.	6	6	0

Comment: Blutsgeschwister has a solid and lengthy production planning system. The product development period is approximately 18 months, including 80% carry-over styles. Lead times are at least three months (sometimes up to five months). The product development team involves suppliers in planning and setting together delivery dates (the exchange between the brand and the suppliers/agents takes place for two weeks before any final decision is made). The brand does not change the style or the quantities after the final order is placed to support reasonable working hours. Blutsgeschwister uses greige or fabric leftovers in its following orders. The member brand used the Fair Working Hours Guide to assess its purchasing practices and potential impact on working hours for discussion with its suppliers, where overtime occurred.

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 Blutsgeschwister 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.	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: Blutsgeschwister has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. The member brand has basic insight into the labour component of its prices. Blutsgeschwister knows the number of actual sewing minutes needed for a style and the labour minute value at most of its suppliers. The company has yet to adapt its calculation of the labour component and let its suppliers include actual capacities, costs and efficiency. Blutsgeschwister includes changes in legal minimum wage or inflation in its buying prices.

Recommendation: Blutsgeschwister is strongly recommended to adapt its labour cost calculation and encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown, for example, using the Fair Price app. Besides, the member could provide suppliers who do not work with fact-based costing training on product costing and how to quote prices, including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding HRDD and 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: Blutsgeschwister has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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 Prevention, mitigation and remediation

Possible Points: 92

Earned Points: 68

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 risk prioritisation and creates subsequent action plans.	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 described in chapter two, Blutsgeschwister has linked factory risks to appropriate follow-up for factories covering 60% of FOB.

Recommendation: Fair Wear recommends the member to further complete its action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Basic	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.	2	6	0

Comment: Blutgeschwister has partly included a gender lens in its improvement and prevention programmes. The brand has conducted Workplace Education Programmes to prevent gender-based violence. Blutgeschwister discussed gender-disaggregated wage data with some of its suppliers to encourage them to hire more women for higher-paid job positions.

Recommendation: Blutgeschwister is recommended to extend its gender lens to all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans 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: Blutgeschwister included some steps to encourage Freedom of Association and effective social dialogue in its action plans. These steps are talking about FOA and SD with the suppliers during visits to understand the situation better. The member has yet to make these steps more comprehensive and detailed.

Recommendation: Fair Wear recommends Blutgeschwister to include steps encouraging Freedom of Association and effective Social Dialogue in all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Advanced	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.	6	6	0

Comment: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and monitored systematically every year (in the case of long-term partners) by checking with suppliers if any system is in place. The brand asks the suppliers to share information on the existence of internal committees and assess if they are capacitated during factory visits. BlutsGeschwister supports and monitors the mechanism and responds when the mechanism is ineffective. The member discovered that the mechanism could have been more effective at one of its suppliers in China and discussed the correct procedure with the factory owner.

Recommendation: Fair Wear recommends BlutsGeschwister to ensure that the evaluation of factory-level grievance mechanisms of its suppliers is systematically considered in purchasing decisions.

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.	Advanced	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.	6	6	0

Comment: Blutsgeschwister cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers that are not shared with other members, Blutsgeschwister works together with other customers. The member brand asked all its suppliers about other customers. Blutsgeschwister contacted another customer who was open to collaboration and appreciated the comprehensive information the member brand shared. Next to that, the member also cooperates in taking more preventive measures, such as organising training and joint living wage work.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	87%	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, Blutsgeschwister could demonstrate it has followed up on 87% of actions out of all open actions. These actions are linked to Corrective Action Plans (CAPs) of full assessments conducted in the previous financial year. Examples of improvement actions that were taken include occupational health and safety and missing wages components. The CAP issues that require improvement actions and are still open are more complex or structural issues and, therefore, need more time to be remediated.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate 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.	4	6	-2

Comment: Blutsgeschwister has identified some root causes of the CAP issues and discussed these with its suppliers. The member has implemented some preventive steps. Examples of the addressed root causes are the lack of awareness of labour rights and purchasing practices. The member brand implemented preventive actions such as onboarding training and checked its purchasing practices to solve these root causes.

Recommendation: Fair Wear recommends Blutsgeschwister to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

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 action plan is needed.	Intermediate	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.	4	6	0

Comment: Blutsgeschwister has some suppliers where action plans are not needed. These cover 13% of the member's total FOB. The member has a system to ensure possible human rights risks are regularly discussed with these suppliers. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

Recommendation: Blutsgeschwister 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.	Advanced	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.	6	6	0

Comment: In the previous year, one factory assessment was conducted. This assessment did not reveal findings related to excessive overtime. Blutsgeschwister analysed the root causes of findings of previous years. According to the member, bad production planning is a significant cause of excessive overtime. Some of Blutsgeschwister's suppliers remain reluctant to be open about working hours. The member has addressed this and promotes transparency about working hours by discussing the topic personally and exiting suppliers unwilling to provide transparent data responsibly. The member brand has taken action to address the root causes. Blutsgeschwister provided its suppliers with the Fair Wear working hours guide and requested improvement recommendations. Following the recommendation of one supplier, the member brand offered earlier order placement and a 30% prepayment. Blutsgeschwister could show that its efforts resulted in reduced excessive overtime at its main supplier in China.

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: In the previous year, one out of one audit included findings regarding non-payment of legal minimum wage/ legally required wage elements. In particular, workers were not always paid for annual and statutory leave. Another finding showed that the factory did not set up a wage system to compare workers' wages to ensure sufficient payments covering the local minimum wage. Blutsgeschwister responded to these findings and promotes transparency about wages by asking for information from the supplier. Some of these findings (also from audits conducted in the previous financial years) have been solved. Nonetheless, Blutsgeschwister could show that all due wages were compensated only for some of these findings.

Recommendation: Fair Wear strongly recommends Blutsgeschwister always to verify whether legal minimum wage issues have been resolved in case factory management claims so. Blutsgeschwister could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check remediation.

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.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	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.	6	6	0

Comment: Blutsgeschwister created an overview of the wage levels at its suppliers and the gap towards the estimated living wage. The brand discusses the topic of wages with almost all of its suppliers by adopting an open-costing approach. Blutsgeschwister has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Based on the root-cause analysis, the brand has developed a time-bound plan to enable the systemic increase of wages at all its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	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.	4	6	0

Comment: Blutsgeschwister has an overview of wages paid in production locations. The member has a strategy on how to finance wage increases at its suppliers. Blutsgeschwister has started analysing the costs of financing wage increases across its supply chain. Blutsgeschwister has worked with most of its suppliers to set target wages.

Recommendation: In determining what is needed and how wages should be increased, it is recommended to involve worker representation. In case Fair Wear members are interested in developing a joint approach to improve wages at a shared supplier, Fair Wear can give advice on measures that need to be taken by Blutsgeschwister GmbH to ensure compliance with anti-trust/anti-competition legislation in relevant jurisdictions.

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: Blutsgeschwister contributes partially to higher wages at some of its production locations. Blutsgeschwister uses its own calculation, which still needs to take the real capacity and efficiency of the suppliers into account. The calculation could not show if the member brand pays its share of the living wage estimate.

Recommendation: Fair Wear recommends Blutsgeschwister to improve its calculation and/or to use the Fair Price App. Blutsgeschwister could 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's Access to Remedy Policy.	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: Blutsgeschwister received no complaints in the past financial year at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Advanced	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.	6	6	0

Comment: The member has enrolled all of its suppliers with findings from its factory assessments on no awareness about CoLP and social dialogue in the following Fair Wear training modules: Violence and Harassment Prevention Programme, Onboarding Training Module and Workplace Education Programme Basic. Following its risk assessment, Blutsgeschwister has implemented the Fair Wear Onboarding Training Module and Violence and Harassment Prevention programme at three suppliers in India to improve communication and to prevent gender-based violence.

Recommendation: Blutsgeschwister is recommended to implement training for all factories, also where this is not part of its action plan.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Advanced	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.	6	6	0

Comment: Blutsgeschwister followed up on the implemented training by discussing the results with the factory management. Additionally, the member used the training results as input for its human rights due diligence by discussing with its Indian supplier how to replicate the training to cover more of the workforce at shared expenses.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights due diligence 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: Blutsgeschwister human rights due diligence system includes a responsible exit strategy. In the past financial year, the member stopped with eleven suppliers. The member followed the steps in the responsible exit strategy. Blutsgeschwister did not discuss the responsible exit strategy with all its suppliers.

Recommendation: Blutsgeschwister 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.	Basic	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.	2	6	0

Comment: Blutsgeschwister enrolled one of its supporting processes suppliers in India in an Fair Wear onboarding training module in the last financial year.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 20

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Advanced	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.	4	4	0

Comment: Blutsgeschwister communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. Blutsgeschwister actively spreads the Fair Wear message via social media (Instagram and Facebook) and newsletter to customers. The brand has also developed retailers' communication guidelines to use Fair Wear's logo.

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: Blutsgeschwister does not sell external brands.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Human rights due diligence reporting 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: Blutsgeschwister has submitted its social report, which Fair Wear approved. Blutsgeschwister 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: Blutsgeschwister published its social report, which includes some factory-level data and remediation results, on its website. The member brand has yet to disclose its full factory list and its time-bound improvement plans.

Recommendation: Blutsgeschwister is recommended to publish a complete factory list and concrete remediation action 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.	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: Blutsgeschwister 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 workers and suppliers.

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

Comment: The previous performance check included the following requirement: Fair Wear recommends Blutsgeschwister not only to have a responsible exit strategy but also to enforce it. Blutsgeschwister followed up on this requirement and carried out its responsible exit strategy at suppliers where the member stopped the cooperation.

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.: Yes

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

Recommendations to Fair Wear

Stephan Künz (CEO) recommended having more information from Fair Wear on the CEO level; longer CEO meetings would be great. Lisa Schröter (CSR) said modular assessments will be very helpful if this is implemented very soon. Open up services to non-Fair Wear brands. In the Memberhub, it would be great to see which resources you have already read better and to include a publication date. Some of the new features in Memberhub are unclear; more notifications on these new features would be helpful.

Brand Performance Check details

Date of Brand Performance Check: **13-03-2024**

Conducted by: **Adele Kolos**

Interviews with: - Karin Ziegler (CEO)

- Stephan Künz (CEO)

- Lisa Schroeter (CSR)

- Sandra Walker (Chief Procurement Officer)