



# **Brand Performance Check**

**OLYMP BEZNER KG**

**Publication date: December 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## Scoring overview

Total score: 102

Possible score: 198

Benchmarking Score: 52

Performance Benchmarking Category: Good



### Summary:

OLYMP BEZNER KG (hereafter OLYMP) has shown progress and met most of Fair Wears' performance requirements. With a total benchmarking score of 52, 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.

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 member brand has initiated the development of its supplier's human rights evaluation and expects to implement this in the last quarter of 2024. While the member collects gender-disaggregated data and adds this lens to its risk scoping, OLYMP has yet to incorporate a gender lens in its action plans across suppliers. OLYMP has a solid system in place to respond to findings such as excessive overtime. It is recommended to further investigate root causes of risks and to identify beyond its own capacity planning and to work on appropriate preventative actions accordingly.

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 followed up on legal minimum wage findings for which remediation is still ongoing. In addition, the member has responded to the updated minimum wage levels in Bangladesh and India. OLYMP looked into the potential risks and worked with its suppliers to ensure the new minimum wage levels were met as legally required. The member brand has been working with a 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.

Fair Wear encourages OLYMP to further identify root causes to human rights risks and to continue working on its living wage strategy. Fair Wear recommends that OLYMP takes sourcing decision based on the outcome of its risk assessment and future supplier evaluations.

During the final check of leverage and bought FOB numbers, there was an inconsistency found from 2022 to 2023. The leverage for this financial year was cross-checked and will serve as a baseline for the upcoming brand performance check.

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 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 turnover of external brands resold 0%

Member of other MSI's/Organisations International Accord - Bangladesh and BCI (Better Cotton Initiative), Oekotex, GOTS, retraced

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
China	9	36.77%
Indonesia	3	23.48%
Viet Nam	5	19.63%
Bangladesh	10	14.76%
India	6	1.6%
Albania	1	1.1%
Tunisia	2	1.06%
Hungary	1	0.9%
Türkiye	4	0.35%
North Macedonia	1	0.16%
Ukraine	1	0.08%
Pakistan	1	0.06%
Italy	1	0.02%
Portugal	1	0.02%
Germany	1	0.01%
Spain	1	0.01%

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 8**

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

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



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

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

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

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

**Possible Points: 90**

**Earned Points: 56**

### 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:** While OLYMP does not have a formal written sourcing strategy, its sourcing practices are guided by internal policies which are aligned with the overarching company strategy. The member company has 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 does not source from Myanmar and the Xinjiang province in China. The member brand has not yet included active cooperation with other buyers in its sourcing strategy.

The member actively sources at 49 supplier, an additional 11 suppliers are used for support production processes. 43 suppliers were actively producing goods where the FOB and leverage were provided. 56% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. This percentage has decreased by 23% in comparison to the previous financial year. According to the member, this was not lead by strategic sourcing decisions but a result of volume changes at suppliers. Almost 4% of the production volume comes from suppliers where OLYMP buys less than 2% of its total FOB.

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. The member has started drafting long-term contracts for its suppliers. 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.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

**Comment:** 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 has also included a gender lens in its risk scoping. 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 from China and has included the risk of forced labour in its risk scoping. It has stopped onboarding new suppliers in the country, and suppliers have to sign a ban to source cotton from Xinjiang and no production facility within the OLYMP supply chain is located in this region. OLYMP's iMPACT Program includes interviews and a worker survey. OLYMP has yet to include input from workers, suppliers and stakeholders for further risk scoping.

For Bangladesh, the risks identified were excessive overtime, health and safety and living wages. For Vietnam, Olymp identified freedom of association and wages to be the most significant risks. The gender specific implications the brand identified was that pressure to deliver unrealistic delivery targets is mainly put on the lowest paid employees which are predominantly women. For wages this could mean gender-based discrimination such as unequal wage rates and job segregation and fewer opportunities for promotion. According to the brand, women can also be more vulnerable to illegal deductions from wages and maternity leave benefits. For health and safety risks, women more often lack access to training, personal protective equipment and clean facilities.

**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. Besides it's The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

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 new suppliers. 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.

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.	Intermediate	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.	4	6	0

**Comment:** OLYMP collects human rights information from potential new suppliers through collecting specific topic questionnaires, Fair Wear questionnaires, training reports, 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 Bangladesh and Indonesia and could show it followed the onboarding process. The member does not have a specific procedure to prioritise suppliers where workers are free to form or join a trade union and/or bargain collectively. While the iMPACT Program audits include a worker sentiment survey, the company does not collect any other information from workers or stakeholders to inform the sourcing decision.

**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 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:** OLYMP added two new production locations in Bangladesh and one new location in Indonesia for finishing. 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 all suppliers. The CSR staff distribute the Worker Information Card (WIC) during the visits to workers and verify if the WIS is hanging. The member also collected supplier questionnaires for all new suppliers. 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.

**Recommendation:** OLYMP is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints 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.	Insufficient	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.	0	6	0

**Comment:** OLYMP has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. For instance, the brand assesses human rights risks in its production locations and identified health and safety, working hours, FoA, GBV and living wages to be the main risks.

The member 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 factory assessments.



OLYMP sources predominately from China, 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. OLYMP is also a signatory member of the International Accord. The member does not yet assess whether the member causes, contributes or is linked to the identified links.

OLYMP has specific monitoring related to the risk of forced labour in China. OLYMP requires its suppliers to sign the cotton ban and to disclose the full supply chain. The member is working on an isotope project to be able to trace back the origin of the cotton its suppliers have sourced for its products. A very high risk of forced labour was found in one of OLYMP's suppliers. The brand could not produce evidence that there was no forced labour, but stated that there was no linkage anymore and continued production at this supplier.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members who receive an insufficient score on this indicator for the second year in a row will be placed in the 'needs improvement' category.

OLYMP is required to assess the risks of forced labour for its suppliers as outlined in Fair Wear's Forced Labour Policy.

**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 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:** 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.

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. The member keeps an overview to keep track of the status of FoA for its suppliers such as the presence of unions, CBAs and democratically elected worker committees.

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:** 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). All collected data on gender are included in the country risk assessment as risk factors on gender (male/female), discrimination, and gender-based violence. OLYMP has analysed how its business practices could affect gender-related risks at its suppliers. The member brand is currently further developing its iMPACT Program with a gender lens. The gender lens should be part of each CoLP.

**Recommendation:** Fair Wear recommends the member to further analyse the gender data collected at country and factory levels and connect them.

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:** OLYMP does not evaluate its suppliers' human rights performance in a systematic way. The brand started to develop its supplier's human rights evaluation, it will be implemented in the last quarter of 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. OLYMP has yet to evaluate human rights performance in a systematic way. In addition, the member brand has not yet developed specific incentives that fit its business model nor has it started sharing the outcome with its suppliers and their worker representatives.

**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 control 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.

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 tools and the technical nature of the product. Monitoring takes place through factory assessments (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.	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:** 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). OLYMP expects this framework to be finalised by the end of 2024.

**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 its 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. CSR is informed on social-related topics when staff from other departments conduct visits at the suppliers. A summary of every audit and visit is shared with the director of supply chain, manufacturing consulting, and the procurement department.

OLYMP 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.	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:** OLYMP developed its internal 'No Excessive OT Guide' and collects monthly overtime 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 pays for air transport. The member has started the conversation with a supplier to conduct production planning in minutes instead of pieces. OLYMP does not have a strategy to follow up or implement this yet.



**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 has started to connect 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 recommended to work with its suppliers to gather additional information to verify the labour cost such as production minutes and efficiency to better inform purchasing prices.

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.	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 seven 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: 86**

**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 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 as described in layer two, OLYMP has linked factory risks to appropriate follow-up for factories covering 61% of FOB. The member uses its recent 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 has yet to broaden its action plan with preventive measures based on the risk assessment in addition to CAP findings. The member prioritised follow-up remediation on health and safety, working hours and wages and benefits.

OLYMP sources from six production locations in Bangladesh, responsible for almost 15% of the member brand's total FOB. The member has signed the International Accord.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans 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. 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.

**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 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:** OLYMP has partially included measures to promote Freedom of Association (FoA) and social dialogue in action plans including training for workers and management on social dialogue. For a supplier in Vietnam, a Fair Wear Communication training has been planned for 2024. Since there were no other findings on FoA, the member didn't plan additional follow up actions despite the risks identified.

**Recommendation:** Fair Wear recommends OLYMP to extend its efforts and include more comprehensive steps in its action plans beyond remediating found violations. 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.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level 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 iMPACT program, 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). For one supplier in India, there was a finding that the complaints box was not accessible since it was placed in front of the security office and obstructed. The member followed up with the finding to ensure this issue was resolved.

OLYMP has yet to actively 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.

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. The member brand cooperates in taking more preventive measures such as starting a project on living wage. 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 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 verified actions.	67%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

**Comment:** During the performance check, the member could demonstrate that up to 67% of the Corrective Action plan (CAP) issues requiring actions have been followed up. OLYMP could demonstrate that its suppliers have worked on several findings. The member followed up on corrective actions related to findings on health and safety in China and Vietnam. For a supplier in India, there was a CAP finding that verbal complaints were not registered which was also followed up.

However, more complex issues such as payment of the living wage, social security payments, access to FoA, and worker representation remain outstanding.

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 some root causes of the CAP issues and discussed these with its suppliers. Based on the brand's risk assessment, OLYMP is a signatory to the International Accord to address the root causes of occupational health and safety issues at its suppliers in Bangladesh to prevent their reoccurrence. OLYMP tracks a root cause for each CAP issue which has been identified by the supplier. OLYMP has yet to further investigate root causes of risks identified and to link appropriate (prevention) actions accordingly.

**Recommendation:** Fair Wear recommends OLYMP to extend its root cause analysis and 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.	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 two suppliers in Albania and Spain where improvement or prevention steps are not needed. These cover 1,1% of the member's total FOB. OLYMP regularly reviews changes to the risk situation. The brand stays in communication with suppliers and are audited by the iMPACT Program. For the supplier in Albania, the worker sentiment survey showed that there was an indication of verbal abuse. Since it was not an official finding through the audit but a worker sentiment input, the supplier was not required to follow up. For the supplier in Spain, the member had a closing meeting with worker representatives.

**Recommendation:** The member is recommended to review which factories do not need any action plans regularly and assess whether input from workers and representatives should be included in action plans.



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 financial year of 2023, there were three factory assessments which reported excessive overtime. For its main supplier in China, there were findings of long working hours and working consecutive days without 1 day off. The member followed up and concluded the issue could not be resolved with capacity planning since it has a leverage of 2% at the factory. The member collected capacity reports to ensure that no extra hours are needed. Similarly, for two suppliers in Bangladesh there was a finding of workers working too many consecutive days without a day off. The member brand worked together with the factory on production planning to avoid excessive overtime work. According to the member, this issue was not caused by the brand's production planning due to its low leverage. The member has yet to further analyse other root causes of excessive overtime and ways to mitigate these root causes.

**Recommendation:** Fair Wear advises OLYMP to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable. Fair Wear recommends cooperating with other customers at the factory to increase leverage when mitigating excessive overtime.

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:** There were several audit findings in Türkiye related to wages and benefits. At one supplier, the wages of two juvenile workers who were employed between June and September were below minimum wage. There was also a finding that workers were not given the number of annual leave days as per law. The member has ended the business relationship with this supplier due to quality and price issues. Communication with the supplier had always been challenging and OLYMP didn't receive a response regarding the audit findings after ceasing business. At the other supplier, the assessment found that the time records and payrolls are inconsistent. The member has followed up and is still in the process of remediation.

In addition, the member has looked into the updated minimum wage levels in Bangladesh and India. OLYMP looked into the risks and worked with its suppliers to ensure the new minimum wage levels were met as legally required.

**Recommendation:** Fair Wear strongly recommends OLYMP to always verify whether legal minimum wage issues have been resolved in case factory management claims so. OLYMP 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.	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. OLYMP embedded a wage assessment in its iMPACT Program audit to collect and communicate 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.

**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.

**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'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:** OLYMP received no complaints through Fair Wear's helpline in the past financial year. The brand did receive a complaint through the OECD National Contact Point (NCP) regarding an exit from a long-term business partner in 2021. While the member brand has engaged with different stakeholders to provide evidence and support the complaint process, OLYMP is still awaiting further instruction since no decision has been made by the NCP in 2023.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	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:** Even though it is not part of a CAP, OLYMP has implemented training through the International Accord. In Bangladesh, four suppliers received health and safety training. There was one training recommended for a supplier in Turkey, but the member has stopped working with this supplier.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	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.	N/A	6	0

**Comment:** OLYMP did not implement training at its suppliers.

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:** OLYMP's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member stopped working with 10 suppliers in Bangladesh, Türkiye, Ukraine, Hungary and Portugal. The reasons for exiting the factories were not fulfilling the trial period, not occupying sufficient capacity, not continuing a specific product category, not complying with social standards. If the decision to end the business relationship was made by the member, it assessed whether there was an effect on the workforce. The member could demonstrate evidence that this was not the case. OLYMP did not discuss the responsible exit strategy with all its suppliers.

**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.	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:** OLYMP undertakes activities related to human rights that go beyond Fair Wear's scope. This includes the Employment Injury Scheme (EIS), a social protection scheme in Bangladesh to provide compensation for work-related injuries. The member is also part of several initiatives to look into social responsibility and workplace safety in its fabric sourcing.



## Layer 4 External communication, outreach, learning, and evaluation

**Possible Points: 22**

**Earned Points: 12**

### Indicators related to communication

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

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:** 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 time bound action plans.

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.	Basic	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.	0	4	-2

**Comment:** In the previous check, the following requirements were included: 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; 2.10 Member company considers a production location's human rights performance in its purchasing decisions; 3.2 Member company's improvement and prevention programmes include a gender lens; 3.12 Member company determines and finances wage increases and 3.13 Percentage of production volume where the member company pays its share of the living wage estimate. Together, less than 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

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Yes

Comments: OLYMP has participated in lobby and advocacy efforts such as signing the CSDDD communication published by Fair Wear.

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Yes

## Recommendations to Fair Wear

The member advises Fair Wear to consider that certain topics can be complex to tackle and might require more time to address. OLYMP recommends Fair Wear to offer more practical support in relation to its increasing requirements. In case of a crisis, the member would like receive assistance faster. OLYMP also recommends Fair Wear to review its data management systems to make further improvements.

# Brand Performance Check details

Date of Brand Performance Check: **16-09-2024**

Conducted by: **Kathleen Gabriel**

Interviews with: Chief Operations Officer: Johann Trischberger

Head of Corporate Sustainability: Katrin Schmuck

Corporate Sustainability Manager Social Compliance: Helen Zitzelsberger