



# **Brand Performance Check**

## **Outdoor & Sports Company Ltd.**

**Publication date: September 2025**

This report covers the evaluation period 01-01-2024 to 31-12-2024

# 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: 142

Possible score: 208

Benchmarking Score: 68

Performance Benchmarking Category: Good



Foundational  
system's criteria

100%



Sourcing strategy

71%



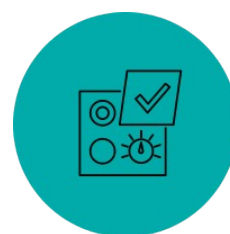
Identifying  
continuous human  
rights risks

87%



Responsible  
purchasing  
practices

69%



Quality and  
coherence of  
prevention and  
remediation system

67%



Improvement and  
prevention

58%



Communication,  
transparency and  
evaluation

69%

### Summary:

The Outdoor & Sports Company Ltd. (OSC) has shown progress and met most of Fair Wear's performance requirements. With a total bench-marking score of 68, the member brand is placed in the Good category.

OSC could demonstrate thorough follow-up on the requirements that were included in the performance check of the previous year. It has detailed its risk scoping tool by adding sourcing model, business model and product type risks. It has created a detailed dashboard showing an overview of risks and actual harms per production location, per country and per issue identified in onsite assessments and broader risk assessment. OSC has also worked on comprehensive overviews on information and risks related to Freedom of Association (FoA), gender equality, and wages across its suppliers. It has created an annual supplier questionnaire and improved its supplier onboarding process and questionnaire. In 2024 it has also conducted internal evaluations of supplier performance and requested feedback on its purchasing practices to suppliers. This input has been integrated into their risk scoping and in some sourcing decisions.

Following Fair Wear's Policy on Business in Myanmar, the member company is disengaging from its production locations in Myanmar. In 2024, it has disengaged from one of its two Myanmar suppliers, and is currently disengaging from the other supplier (disengagement planned to be finalised in September 2025). While OSC is employing a responsible exit strategy, Fair Wear recommends attentively monitoring the situation at the supplier and have a plan in place in case layoffs are needed.

OSC sources from Bangladesh. In 2024, the member brand has signed the Accord, and started collaborating with the RMG Sustainability Council (RSC), as required per Fair Wear's Enhanced HRDD Policy for Bangladesh.

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 Outdoor & Sports Company Ltd.

## Member company information

Member since: 1 Jan 2012

Product types: Sports & activewear and Outdoorwear

Percentage of turnover of external brands resold 0%

Number of grievances received last financial year 0

## Basic requirements

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

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	31	49.18%
Myanmar	3	12.47%
Viet Nam	11	11.63%
Ukraine	1	6.49%
Cambodia	3	5.99%
United Kingdom of Great Britain and Northern Ireland	1	4.44%
Bangladesh	4	4.15%
United Arab Emirates	2	1.78%
Indonesia	3	1.64%
Serbia	1	1.1%
Bulgaria	1	0.76%
Lao People's Democratic Republic	1	0.18%
India	4	0.17%

# 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: OSC has a solid Human Rights Due Diligence policy in place.

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 grievance 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: OSC 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:** OSC 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: 68**

### 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.	Advanced	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.	6	6	0

**Comment:** OSC's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients, while favouring suppliers with buyers who are Fair Wear members. OSC sourcing strategy mentions that it does not have any suppliers that represent less than 3% of their turnover unless OSC is offering a unique brand building product or capability that cannot be procured from one of its premier suppliers. In alignment with OSC disengagement policy, any decision to end a supplier relationship typically comes only after several seasons and is often related to persistent labour rights issues.

The member brand has 66 active suppliers, including 41 suppliers and 25 process subcontractors. 59% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 19% of the production volume comes from suppliers where OSC buys less than 2% of its total FOB. OSC is disengaging from its two suppliers in Myanmar.

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:** 79% of the member's total FOB volume comes from suppliers with whom OSC has a business relationship for at least five years, which is a slight decrease compared to the year before due to fluctuations in turnover and order volume. 56% of the member's total FOB volume comes from suppliers with whom OSC has a business relation for more than 10 years.

Overall, OSC's sourcing strategy focuses on maintaining long-term relationships, however the member does not commit to long-term contracts yet nor mentions the use of long-term contracts in the sourcing strategy.

**Recommendation:** Fair Wear recommends OSC to commit to long-term contracts and embed this commitment in their sourcing strategy.

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:** OSC conducts risk scoping on the sector, business model, sourcing model, product and country level. The member includes all eight labour standards in this scoping, and uses a detailed dashboard for all risk levels. The overview includes data from global databases including Gender Index, International Trade Union Confederation (ITUC), Fair Wear country profiles and Human Rights Watch reports, as well as updates on geopolitical events. The member also includes input from their Quality Control staff interviews with workers, factory management, collection of meeting notes from factory-based unions (where present) or committees, and grievances. The country risk overview is linked to a detailed factory risk assessment where the most urgent risks are flagged per factory.

However, in its risk scoping, the member has not assessed the impact and prevalence of all risks correctly. For China, OSC assessed the overall country risk as moderate, while several sources indicate otherwise. In the overall risk scoping, mitigation strategies are missing for some of the risks. In its business model risk scoping, severity and likelihood of risks are missing.

The member adjusts its sourcing strategy based on the risk scoping, as the outcomes of the risk scoping are included in decision-making. The risk scoping shows Myanmar having the highest likelihood and impact of Code of Labour Practices (CoLP) violations. After discussions with Fair Wear, the member brand has initiated a Responsible Exit Strategy from Myanmar.

In China, OSC turnover percentage has decreased from 57% in 2023 to 49% in 2024, as the member is gradually reducing its volume to become less reliant on the country and to move to countries where freedom of association is the norm. However, part of the production volume will be or has been placed in Vietnam and Bangladesh, countries where freedom of association is still restricted.

In 2024, OSC became a signatory of the International Accord and joined the Employment Injury Scheme to ensure safe and healthy working conditions at its suppliers in Bangladesh.

In 2024, OSC has also added more detailed risks for all countries, including wages, migrant workers and bonded labour risks for United Arab Emirates (UAE). In UAE, OSC is disengaging from one supplier as a result of the risk scoping, risk assessment and lack of cooperation of the factory management in addressing human rights risks and violations. The member brand has also started sourcing from Lao, which is a new sourcing country: a complete risk scoping was developed before starting sourcing from this country.

**Recommendation:** OSC is recommended to complete its risk scoping by adding mitigation strategies for all risks included in the scoping as well as the severity and likelihood of the business model risks. OSC is also recommended to review the overall country risk for China, to ensure it is aligned with Fair Wear's country profile.

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 OSC to inform new suppliers about its HRDD policy and Fair Wear membership by sending a sourcing pack that includes a Health and Safety questionnaire and Factory Onboarding Questionnaire based on the eight Code of Labour Practices. In 2024, the questionnaire was improved to include Fair Wear's supplier questionnaire and more detailed information about the working conditions. Previous audit findings are also requested to the factory. Additionally, it is standard practice for OSC as part of the onboarding process to visit the supplier (where possible). The visiting staff or Sustainability team has conversations with the new factory about grievance mechanisms. OSC asks if the factory has a written grievance policy, information on grievance mechanisms in an employee handbook, and asks for a description of the grievance process. The communication and transparency of the new supplier management towards CSR and the willingness to address human rights risks and violations is an important factor when starting the onboarding process.

This process has been followed for all suppliers added last year (in China, Cambodia and India), and all subcontractors are also onboarded following the same process. OSC has a written sourcing process overview that describes each of the stages of this process, and the topics treated at each of the stages of engagement with the new production location. Human rights topics are included in some stages of the process, however not from the very initial engagements.

**Recommendation:** Fair Wear recommends that OSC includes in their sourcing process (in practice and in the written overview) human rights as agenda points during the very first engagements with a new production location (at least in stages 2 and 3 of their sourcing process overview). OSC is encouraged to review the Fair Wear Responsible sourcing dialogue guidance and tools for agenda items for these engagements with the factory.

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:** OSC collects human rights information of potential new suppliers by collecting self-assessments, existing audit reports and, when possible, visiting them. OSC collects information on grievance mechanisms, freedom of association and includes a dedicated workforce data form to collect information about the gender composition of the factory. This now includes gender split within the unions where applicable. This is part of the standard onboarding procedure of the member brand. OSC also collects audit reports for new production locations, including subcontractors for supporting processes. The company currently does not collect information directly from workers or stakeholders.

For its Bangladesh suppliers, OSC checked the remediation status on the RSC website. The member brand discusses with the International Accord about the status of factories every two months, they include those risks in their risk scoping by cross-checking with RSC risk scoping.

OSC's sourcing strategy mentions a preference for countries where freedom of association is the norm. However, the sourcing strategy does not explicitly mention privileging working with suppliers where workers are free to form a trade union and/or bargain collectively.

**Recommendation:** Fair Wear recommends OSC to include in the sourcing strategy an explicit mention of privileging working with suppliers where workers are free to form a trade union and/or bargain collectively. Additionally, Fair Wear encourages the member to collect worker and stakeholder input before placing the first order (e.g., by organising a full assessment that includes worker interviews).

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.	Intermediate	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.	4	6	0



**Comment:** OSC shares information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted at all suppliers, and OSC checks whether it is posted in a place that is accessible to workers. OSC has organised onboarding sessions within the first year of doing business for one new production location in China and will organise one for their new production location in Vietnam, but not for all; the company is in the process of looking for an external training provider for their new production location in Lao. However, OSC discusses with new production locations the possibility of organising internal factory training to train workers. The member discusses social dialogue based on the factory questionnaire information they collect, and follows the same process for subcontractors as well.

**Recommendation:** OSC is recommended to organise onboarding sessions specifically focusing on the CoLP, social dialogue and the complaints mechanism within the first year of doing business, for all new production locations. Where Fair Wear is not active, OSC could explore options to have similar training delivered by other organisations.

## 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:** OSC has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. The member brand assesses and monitors human rights risks in its production locations by collecting information from global databases, requesting documentation and information from factories, including wage documentation to monitor paid wages and increases, attendance records to monitor working hours, factory policies to review factory procedures and compliance to CoLP, and images to monitor health and safety compliance. Next to its systematic approach, the brand ensures it uses different tools that include input from workers, suppliers, and other stakeholders, such as Fair Wear onsite assessments and worker interviews during QC staff visits.

In 2024, OSC has improved their supplier risk dashboard, which includes an overview of risks and harms with their degree of severity, likelihood and remediability. OSC assess whether they caused, contributed or are linked to the risks and harms. A gender lens and root causes are added as well. The input to the dashboard comes from several sources like geopolitical events, historic harms, actual harms from CAPs, staff visits, or as they arise, and potential harms from continuous risk scoping. However, subcontractors are not yet included in the dashboard.

The risk assessment reflects that health and safety are critical risks for OSC's production locations in Bangladesh. Both locations fall under the RSC, and OSC has signed the International Accord. For Myanmar, the two production locations risk profiles reflect the Fair Wear country profile and include input from the Fair Wear Myanmar country risk scoping, as well as information from Fair Wear country profile, news updates, and input from other Fair Wear members sourcing from the same production locations, with whom OSC is in collaboration. However, detailed up to date factory assessment information was not collected for one of the Myanmar production locations; although OSC is exiting this location, in 2024 it was still one of the strategic suppliers, with one of the highest FOB.

OSC selects which factories will be assessed based on the risk assessment, the order volume that OSC plans for the supplier, and the year of the last audit. Where Fair Wear is active, these assessments are usually conducted by Fair Wear. Next to that, OSC regularly requests wage documentation to monitor the paid wages and whether price increases end up with workers.

**Recommendation:** Member companies are strongly advised to follow Fair Wear's guidance for disengaging from Myanmar, which includes actions for assessing the situation at their suppliers. Fair Wear also recommends OSC to include subcontractors in the supplier dashboard, including the relevant risks and harms assessed.

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:** OSC has mapped the likelihood and impact of risks to Freedom of Association (FoA) in all its sourcing countries and can explain the main risks per country. It has included information from the ITUC in each country profile and understands the status of FoA at each of its suppliers. OSC can explain what the main risks of violations to FoA are at all its suppliers, including the risks specific to women workers. The member knows which suppliers have trade unions and CBAs in place, and collects committees/factory-based unions meeting minutes and agendas.

In 2024, the member has completed a detailed mapping of FoA risks and status at all suppliers that includes gender disaggregated data related to female worker representatives and gender composition of factory-based unions and committees.

**Recommendation:** Fair Wear recommends OSC to integrate the information of their FoA overview into their Supplier Dashboard.

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.	Advanced	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.	6	6	0

**Comment:** In 2024, OSC has actively collected workforce demographic data across all factories, integrating this with qualitative factory-level data. This includes a gender breakdown by pay type, union committee and membership, as well as gender distribution and disparities among workers, supervisors, and management. Gender risks are included in OSC's country risk assessment, per labour standard, reviewed alongside the Gender Inequality Index and Gender Gap Index. Corrective Action Plans (CAPs) are also reviewed for specific gender-related risks, with each identified issue added to the factory-level Risk Dashboard. Workforce demographic data, including gender distribution, has also been collected at all subcontractor facilities.

India and Bangladesh have been identified by OSC as high-risk countries in terms of gender issues and inequality. The member conducted reviews of factories in these countries, assessing employment data, representation in management and supervisory roles, policies supporting equality, and facility conditions. Further research was carried out at a national level, focusing on laws and rights relevant to gender. The Fair Wear Gender Questionnaire was analysed for all relevant factories in India and Bangladesh.

The member has requested information from factories regarding existing gender-specific and anti-harassment/non-discrimination policies, the availability of separate gender facilities, and access to menstrual hygiene products. The analysis showed lack of female representation in management and supervisory roles, need for facilities improvement and gender wage gaps.

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:** Suppliers' human rights performance is evaluated systematically every year, together with other criteria. OSC looks at the suppliers' perceived attitude towards labour standards and communication. Although OSC collects feedback on the supplier human rights and commercial performance from purchasing and Corporate Social Responsibility (CSR) departments through its internal supplier appraisal form, the current focus is mostly on commercial aspects rather than human rights. OSC also collects feedback from the supplier on OSC purchasing practices. When a supplier score significantly lower than others, OSC has a conversation and informs them how it expects them to improve before taking the decision to decrease orders. The outcome of this evaluation influences purchasing decisions, and best-performing suppliers are rewarded with more order volume. Similarly, the supplier feedback is used to internally discuss and improve OSC purchasing practices. As mentioned above, OSC is disengaging from Myanmar.

**Recommendation:** Fair Wear recommends OSC to share and discuss the outcome of the supplier evaluation not only with suppliers but also with their worker representatives, as well as to ensure that the evaluation of human rights performance of its suppliers is systematically considered in purchasing decisions. Additionally, OSC is recommended to review the internal supplier appraisal, which currently includes some consideration of human rights risks; however, the primary focus remains on aspects such as quality, timely delivery, and related performance indicators. While these factors are valuable, the emphasis here should be on evaluating human rights risks to inform sourcing decisions more effectively. For example, it would be relevant to collect information on how suppliers responded during the follow-up of Corrective Action Plans (CAPs) like what actions were taken, the nature of engagement during sourcing dialogues, and whether the supplier demonstrated cooperation.

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:** Unauthorised subcontracting is forbidden according to the supplier Code of Conduct signed by the supplier every year. Therefore, suppliers must not utilise subcontractors or third parties or change factories or subcontractors producing OSC products without first obtaining written approval from top management.

OSC uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. Next to that, it assesses the factory's production capacity, including available production processes. OSC understands how many production lines are allocated to their orders, as part of their forecasting. In one case, a factory had to relocate to another facility due to space constraints. In another, the existing capacity was insufficient, requiring a reassessment of both productivity levels and available floor space. In all cases, these checks allow OSC to review the feasibility of the order and prevent unauthorised subcontracting. Additionally, OSC actively prevents unauthorised subcontracting by having its local QC team visit its suppliers during production. There is no evidence of missing first-tier locations in the database.

In early 2025 they collected information on subcontracted processes through a new annual questionnaire, allowing the factories to declare subcontractors. This led to a change in subcontractors on the previous year, to which they have followed up on by including subcontractors to the database and by onboarding them following their standard onboarding process.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Advanced	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.	4	4	0

**Comment:** OSC analyses their product range annually to assess the risk of potential homeworkers in the manufacturing process, as part of their product risk scoping. They ask factories whether homeworkers are involved and whether the factory has a relevant policy in place; the QC team in Asia is requested to check for any indications of homeworking during factory visits and to verify whether facility capacity aligns with the size of placed orders. Most of their products are technical apparel and generally not feasible to produce in a home setting. OSC's Homeworking Tracker documents these checks with factories.

## Indicators on Responsible purchasing practices

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

**Comment:** In 2024, OSC updated its Supplier Code of Conduct by reviewing the appendix that includes clauses on damages and liability. However, the clauses in this document place an unequal burden on the suppliers, for instance, by holding them financially responsible for defects without proof of fault, or having the option to cancel orders and requiring the supplier to remove, replace or refund the goods in case of supplier non-compliance with the terms of the agreement. Payment terms are up to 60 days upon being invoiced.

**Requirement:** OSC should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

**Recommendation:** Fair Wear recommends that in its supplier contracts, OSC ensures that the clauses establish a fair and balanced distribution of responsibilities and liabilities between the brand and the supplier. The contracts should clearly define accountability, specifying that any claims related to damages, delays, or other failures must be supported by proof of fault. This approach promotes mutual accountability and helps prevent the unfair transfer of risk onto either party. OSC could also add clauses that commit to ring-fencing labour costs to prevent negotiations from negatively affecting wages.

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. Information collected at the supplier level is used to identify issues such as capacity constraints or potential delays, which can inform decisions around lead times, order placement, and production planning. During the recent unrest in Bangladesh, the team monitored the political context, noted raw material delays, and accepted a revised shipment schedule. Overtime tracking continued after the disruption to monitor any ongoing impacts.

However, the member does not have strong KPIs in place that support good sourcing and pricing strategies within their sourcing, purchasing, and design departments.

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



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	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:** OSC has a robust and integrated production planning system. The member works with a critical path schedule that is developed and reviewed each season. This timeline functions as a living document, allowing for flexibility and updates based on real-time developments. OSC splits orders for suppliers to spread the production until the final delivery, and determines all deadlines regarding production lead time in partnership with CMT and fabric suppliers.

To avoid putting pressure on factories, OSC aims at making earlier purchasing decisions, even before having full confirmation from retailers. While this introduces risk (particularly when final order volumes are unknown), they evaluate how much risk they are willing to take depending on the product type (e.g. stockable items). As product certification requirements grow, they are also simplifying fabric selections and consolidating materials across styles to increase efficiency. For example, they may pre-agree with factories on a fabric order, then use that fabric in production several weeks later across multiple styles. Another strategy OSC uses it to shift carry-over styles outside the core seasonal timeline, which allows for better planning. Grouping styles with similar materials also improves efficiency and eases pressure during peak production periods.

The sourcing team remains in daily contact with updated forecasts, etc. Generally, these discussions include updates on available capacity, possible increases in order and how the supplier can manage this. In case orders increase from other clients, OSC tries to accommodate this by staggering or moving its orders forward. Production of the never-out-of-stock (NOS) items and bestsellers is planned during factories' downtime to mitigate overtime issues. After every season, there is an evaluation to discuss how the production went and if there are areas of improvement.

OSC allows flexibility on delivery timelines when necessary. If the factory has difficulty with the agreed production timelines, OSC and the supplier will jointly determine options, such as splitting the delivery of the order, etc.

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:** OSC collects information about wage levels at all its suppliers using audits and requests wage slips. CSR provides sourcing with an overview of all current legal minimum wage levels. OSC then runs a plausibility check to see if its prices can cover legal minimum wages.

OSC requests open costings to all suppliers, but not all accept to share the complete cost breakdown. For the suppliers who share the open costing calculations, price negotiations are based on them, and OSC simplifies technical specifications to meet a target price rather than pushing the factory to lower prices. Technicians spend significant time in the factory to explore feasible options, and they then feed this knowledge back to the design team.

The member bases their buying plans on previous year's purchasing data, so they have a reference point for expected costs. If wages increase in a particular region, they anticipate corresponding price adjustments from suppliers. For new products, OSC begins by benchmarking costs based on fabric and trim prices.

OSC does not calculate labour minutes per style, which would allow sufficient insight into the labour cost per product style. It, therefore, cannot know exactly whether the prices it pays can cover the payment of legal minimum wages.

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:** OSC does not make use of sourcing intermediaries.

## Layer 3 Prevention, mitigation and remediation

**Possible Points: 92**

**Earned Points: 56**

### 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.	Basic	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.	2	6	0

**Comment:** OSC has prioritised risks and created action plans per supplier, for all suppliers. These match the risk profile.

OSC sources from 2 production locations in Bangladesh. The member brand signed the International Accord in 2024 and bases its action plans on the recommendations of the RSC. All factories are covered under the RSC.

Each quarter, OSC hands in a Myanmar progress report per factory, covering the topics of grievance mechanisms, wages, and monitoring of conscription law impacts. In 2024, OSC's focus for Myanmar was on mitigating and preventing conscription law impacts on workers, as well as raising wages beyond minimum compliance, by ensuring a minimum wage of 10000 kyat per day for all workers. The action plan for Myanmar suppliers was based on the general country risks rather than on detailed up to date factory assessment information. This type of information was not collected for one of the Myanmar production locations where production is still ongoing. Although OSC is disengaging from this location, in 2024 it was still one of the strategic suppliers, with one of the highest FOB.

**Recommendation:** Fair Wear recommends to base their Myanmar action plans on information coming from factory assessments, where all risks can be assessed.

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

**Comment:** In 2024, OSC has collected gender-disaggregated data per factory, has included gender information in its country risk profiles, and has included a comprehensive gender lens in its action plans. For each action, OSC has looked into gender specific risks, such as considering care responsibilities when addressing Over Time (OT) findings.

**Recommendation:** OSC is recommended to start implementing the gender lens it included in its 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.	Intermediate	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.	4	6	0

**Comment:** OSC included comprehensive steps to encourage FoA and effective social dialogue in all its action plans. The member has started to implement these steps.

OSC also assesses if worker representatives need more training to carry out their role, and offer support; the member started to support one Vietnamese supplier in financing and organising training on FoA and social dialogue in 2025.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Intermediate	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.	4	6	0

**Comment:** OSC assess the presence of internal grievance mechanisms at the start of a business relation through their onboarding factory questionnaire. OSC monitors the effectiveness of internal mechanisms via audits, annual questionnaire and in conversation with suppliers, including as part of audit follow up. Visiting staff is also instructed to check the suggestion box, grievances log, and discuss with management how the mechanism is managed. OSC is taking actions to support internal grievance mechanisms, such as requesting factories to review their policies and organising training on factory dialogue and FoA. However, workers and worker representatives are not yet included in discussions about the mechanism and how it can be improved.

**Recommendation:** Fair Wear recommends OSC to always involve suppliers and worker representatives in the assessment of the factory-level 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.	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:** OSC cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints, but also taking preventive steps together, for instance, by organising training. OSC also exchanges information regarding shared sourcing countries and factories with other customers who are not members of Fair Wear. In 2024, OSC has also worked on joint actions with the RSC and signatories of the International Accord.

**Indicators on implementation: improvement and prevention**

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	66%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2

**Comment:** During the brand performance check, OSC could demonstrate with a sample that 66% of the CAP issues requiring improvement actions have been addressed. Issues that have been resolved include issues related to wages, overtime and member sourcing. OSC has also become signatory of the International Accord and works with RSC on prevention and remediation in its Bangladesh suppliers. Although the member has worked with its suppliers in Myanmar to increase wages, OSC was unable to share an external CAP for one of its Myanmar suppliers, which has one of the highest FOB. For this reason, the member is given intermediate instead of advanced score for this indicator.

**Requirement:** Members sourcing from Myanmar need to demonstrate validated progress on improvements.

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:** From 2024, OSC has started looking into the root causes for CAP issues in a more comprehensive and detailed way. In one of their factories in Bulgaria, a factory onsite assessment revealed that workers were not paid during work stoppages. OSC investigated into the root causes, and from discussions with the factory the main reason for the stoppages turned out to be a lack of orders. OSC has internally reviewed their order volume, scheduling, and timelines to assess whether there's an opportunity to fill existing gaps in the factory production or shift production to create more balanced planning. OSC has also explored ways to optimise its styles to potentially increase production at the factory and has been monitoring the situation to see if it recurs, and how to prevent it. The member draws from risk scoping, risk assessment, CAP findings and discussions with suppliers for informed root cause analysis. Though this has improved from 2023, OSC could more proactively address ways to prevent issues from reoccurring. In Myanmar, the member brand was not able to concretely explain how it addresses the root cause of issues at its suppliers.

**Recommendation:** Fair Wear strongly recommends that the size of the supply chain and the available resources of OSC to follow up on CAP issues actively coincide. Possible solutions could be to decrease the number of suppliers or increase the resources needed to work on preventive actions. Especially for its suppliers in Myanmar, which are under heightened due diligence due to the current situation in the country, OSC is recommended to take specific steps, for instance to support internal grievance mechanisms in its production location.

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:** OSC has one supplier in Northern Ireland where all employees are employed by, and the facility is owned by, OSC parent company. OSC has weekly meetings with the supplier, and next to that, visits the location. The factory has been accredited with 'Gold' standard by an organisation assessing workers' feelings about their workplace and providing recommendations to help improve these. All Directors meet weekly to discuss any concerns or topics, including those related to workers welfare. However, OSC has not included worker representatives or local unions in these discussions.

**Recommendation:** OSC 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.	Intermediate	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.	4	6	0

**Comment:** In 2024, two out of two Fair Wear onsite assessments reports mentioned findings on reasonable hours of work. The audit for the supplier in Bangladesh showed excessive overtime, and the audit for the Chinese supplier showed inconsistent records, excessive overtime and breach of legal rest day provision. In this factory, OSC assessed the root causes and determined that it had not directly contributed to the excessive overtime. The member brand reviewed production planning and forecasting to verify whether any pressure had been placed on the factory to accelerate production. OSC was able to present their forecasting data to demonstrate that the overtime resulted from factory-level decisions.

Some excessive overtime findings from previous years remain open, including in a Bulgarian supplier. In this factory, overtime hours were found to have been worked but not properly documented. In 2024, OSC addressed this issue with the supplier, monitored time records, and received anonymised wage data to verify that remediation measures were being implemented. It was also identified that rest breaks were not consistently provided at the appropriate times.

When it is determined that the excessive overtime is not due to OSC production planning, and when possible, the member coordinates early purchases with the factory to enable production during non-peak periods. This approach helps to distribute production more evenly throughout the year. In the case of a Chinese supplier, this strategy was supported by more stable availability of trimmings and other materials. However, not in all cases OSC was able to show that its efforts led to reduced excessive overtime.

When production delays occur, OSC investigates the root cause and monitors all order statuses closely. If the delay is due to fabric delivery, OSC is typically informed in advance and engage in discussions with fabric mills to explore options for expediting delivery, such as through airfreight or alternative methods. If expediting is not feasible, the member adjusts the production schedule accordingly. OSC assesses whether the delay can be accommodated; if not, it evaluates the option of using airfreight at their own expense. When delays originate at the factory level, OSC assesses whether the revised timeline can be integrated into the broader schedule and aim to remain flexible. In these cases, the member brand negotiates with the factory to determine how airfreight costs can be shared.

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:** OSC has a comprehensive wage data overview across their supply chain. In the previous year, one out of two Fair Wear onsite assessments included findings regarding non-payment of legal minimum wage/ legally required wage elements. That is the case of a supplier in Bangladesh where wage records were incomplete or inconsistent and where allowances, bonuses and benefits were not paid as legally required. In this factory, OSC discussed with factory management and asked for evidence of the wage records, cross-checked with its information and discussed the remediation steps. The violations were remediated by improving the recording systems and the factory shared evidence of payment of compensation.

In a Cambodian supplier, an external audit revealed that sewing and finishing workers were paid by piece rate, with only 24% of workers earning at least the minimum wage. New recruits were not properly trained on wage calculation, and some benefits were not paid. OSC is still working on remediating and preventing these issues.

In a UAE supplier an external audit revealed non-compliance with wage standards, including incorrect payment of overtime rate and wages below Indian Embassy recommendations. OSC discussed with management and because of lack of their cooperation and other reasons, OSC entered a process of disengagement from this factory. For this reason, OSC could not remediate this violation nor show that all due wages were compensated.

**Requirement:** If a supplier fails to comply with legal wage regulations, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected.

**Recommendation:** Fair Wear strongly recommends OSC to ensure problems of payments below legal minimum wages are not just prevented going forward but also remediated retroactively.

Fair Wear strongly recommends OSC to always verify whether legal minimum wage issues have been resolved in case factory management claims so. OSC 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.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	4	6	0

**Comment:** OSC discusses the topic of wages with its suppliers if assessments show that wages are below the living wage estimate, and uses a detailed wage overview to understand the gap between paid wages and living wage estimates per country and per supplier. In 2023, with the help of a consultancy, the member brand had developed a living wage proposal that includes a time-bound approach to increase wages towards a living wage for two of OSC's largest suppliers. However, for 2024 the member was not able to show concrete steps forward on the living wage project for these two suppliers.

**Recommendation:** Fair Wear encourages OSC 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.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Basic	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.	2	6	0

**Comment:** OSC has started to address the topic of living wage internally by developing a living wage proposal for two factories in China. Based on different living wage estimates, the member brand has developed three different target wages for its sourcing countries. There is no timeline attached to these yet. The target wages are set but not yet discussed and agreed with factory management nor worker representatives.

In 2024, OSC could not take significant steps forward in their living wage project in China. In the case of one factory, production was moved to another facility, so that made it not possible to continue with the project.

**Recommendation:** In determining what is needed and how wages should be increased, it is recommended to involve worker representation. In addition, we strongly recommend members to ensure that they integrate the financing of wage increases into their own systems, herewith committing to a long-term process that leads to sustainable implementation of living wages. Fair Wear recommends OSC to include timelines for when it likes to achieve target wages for more production locations.

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.	7%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

**Comment:** OSC wage data shows that a living wage is paid at two factories, responsible for 7% of OSC's FOB. However, this information could not be verified through external or Fair Wear onsite assessments.

**Recommendation:** OSC is encouraged to roll out its approach to wage increase to other suppliers.

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:** In 2024, no complaint was received. OSC has followed up on a previous complaint from 2023 by requesting meeting notes and comment from worker committees, and by discussing the complaint with the factory management as well as with the union, but OSC found that the issue was not raised during the union meeting.

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:** OSC has some CAP findings where training is a recommended follow-up action, mostly about ensuring that workers are aware of the Code of Labour Practices. In 2024, two audits flagged the need for training to be organised, but OSC has not yet initiated training in these factories. In the previous three years, several training sessions were conducted in China, Bangladesh, Bulgaria and Vietnam. However, in 2024 no new training was conducted. In a supplier in Bangladesh, a Violence and Harassment Prevention Programme is in progress since 2022. OSC is looking for training providers in countries where Fair Wear does not have a local training team and is in contact with other brands to initiate such training. The member has also started to track internal training conducted within factories and reviewing training schedules where available for a complete overview.

**Recommendation:** The member is recommended to implement training for all factories where this is part of its action plan. It is also recommended to submit information on the internal training conducted by factory staff to workers to Fair Wear for review.

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:** OSC follows up on scheduled training by sharing reports and discussing content and feedback with factory management, including through follow-up calls. Insights from these discussions inform OSC's risk profiling, risk dashboard, and action plans. Over the past year, OSC has also reviewed internal factory-led training to identify potential gaps or risks.

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:** OSC's human rights due diligence system includes a responsible exit strategy and the member brand refers to it in its Code of Conduct.

During 2024, the member reviewed and updated their Supplier Code of Conduct, which has been circulated to all suppliers. Each season, OSC conducts forecasting based on the production capacity available, followed by the sampling process.

Through seasonal forecasting and sampling, they provide suppliers with an idea of upcoming demand. If they are considering discontinuing a product or supplier relationship, they initiate discussions 12 to 18 months in advance. This early communication allows for suppliers to be given notice and to prepare accordingly, especially if alternative options are limited for OSC.

OSC is disengaging from its two Myanmar suppliers. In one of the supplier, the disengagement process is finalised. No workers were affected by layoffs because of OSC disengagement, and no workers were conscripted until the completion of disengagement. The factory has been less willing to share data with OSC but continues producing for other brands.

For the other Myanmar supplier, the disengagement process is planned until March 2025 and in the following 6 months. However, the Summer Spring 2025 (SS25) production planned for a supplier in Bangladesh moved back to Myanmar due to unrest in Bangladesh. As a result, OSC production increased in this supplier for SS25. Until now, the factory has responded to all queries with OSC, and shared the new workers recruitment challenges, and no issue of conscription were identified until March.

OSC is also disengaging from its UAE supplier, where it visited the factory, decreased the orders, agreed the timings, discussed reasons for disengaging. In this factory, legal minimum wages are not paid. OSC continued to work with the factory on the CAP and looking into ways to mitigate impacts on the factory and workers, although the factory has been reluctant to collaborate with OSC.

**Recommendation:** As part of its responsible disengagement from its factories, OSC is recommended to consider its responsibility regarding workers' compensation in case workers do need to get dismissed and ensure a plan is in place. Moreover, OSC is strongly recommended to remediate the lack of legal minimum wage payment to workers employed in one of the production location it is disengaging from.

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:** OSC undertakes activities related to human rights that go beyond Fair Wear's scope, namely by collecting environmental and human rights information from supplier of other tiers (raw materials), including whether they're audited, what certifications they hold, how they track this data, and using BSCI as common standard.

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

Possible Points: 26

Earned Points: 18

## 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:** OSC communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. OSC talked about sustainability and Fair Wear membership during different events with retailers and wider audiences. OSC clearly displays the Fair Wear logo at trade fairs.

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).	Intermediate	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.	2	4	0

**Comment:** OSC sells one external brand. The member has collected information about the human rights due diligence of the brand; the brand had an audit and all CAP actions were corrected, and it has a person responsible for HRDD. However, the brand is not member of a credible HRDD initiative.

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:** OSC has submitted its social report, which Fair Wear reviewed. OSC has published the report on its websites.

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:** OSC published its social report, which includes some factory-level data and remediation results, on its website.

**Recommendation:** OSC is recommended to include more factory-level data in its reporting and ensure suppliers consent with data sharing and to publish 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.	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:** OSC risk dashboard also serves as a system to track actions and progress. The internal evaluation system involves top management. In its evaluation system, the member includes triangulated information from external sources, such as Global Rights Index and Gender Inequality Index. However, the brand does not yet include workers feedback in its evaluation systems.

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



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Intermediate	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

**Comment:** The previous performance check included three requirements of which OSC resolved two, by becoming signatory of the International Accord. The only outstanding requirement is to create supplier contracts that include shared responsibilities and support the implementation of human rights due diligence. While OSC has reviewed and shared its Supplier Code of Conduct with all suppliers, the clauses do not yet include shared responsibility and liability between brand-supplier.

**Recommendation:** OSC is strongly recommended to address the requirements that are still outstanding.

## 5 Appreciation chapter

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

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

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

**Comments:** In 2024 OSC became a signatory to the UN Women's Empowerment Principles; the member also talked about its sustainability work at a film festival and in their marketing efforts.

## Recommendations to Fair Wear

OSC appreciates Fair Wear's efforts to open discussions on wages in the garment industry, but suppliers still struggle to meet even minimum wage requirements due to limited access to wage data. It would help if Fair Wear provided clear wage benchmarks and access to tools like WageIndicator database.

Training and audit processes need improvement, as delays and report deliveries make follow-up difficult.

Environmental risk assessments are too general and would benefit from more granular, country-specific analysis. Fair Wear's limited country coverage is also a challenge; expanding support (e.g., using the Vietnam team for Laos) would be helpful.

## Brand Performance Check details

Date of Brand Performance Check: **23-07-2025**

Conducted by: **Sofia Menfalout**

Interviews with: **Hamish Dunn, Brand Director of Mountain Equipment**

**Philippa Hill, Sustainability Manager,**

**Katherine Robinson, Ethics and Supply Chain Coordinator**

**Steve Rothwell – Commercial Director**

**Sarah Forte– Commercial Director**

**Smita Lad – Management Accountant**