Brand Performance Check

Odlo International AG

Publication date: March 2026

This report covers the evaluation period 01-07-2024 to 30-06-2025

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online Brand Performance Check Guide provides more information about the indicators.

Scoring overview

Total score: 156
Possible score: 208
Benchmarking Score: 75
Performance Benchmarking Category: Leader



Foundational system's criteria	Sourcing strategy	Identifying continuous human rights risks	Responsible purchasing practices	Quality and coherence of prevention and remediation system	Improvement and prevention	Communication, transparency and evaluation
100%	71%	87%	69%	73%	76%	73%

Summary:

Odlo has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 75, the member is placed in Leader category.

In the financial year starting in 2024, the member brand had a leadership transition with the appointment of a new Chief Operating Officer (COO). While the economic situation in 2024/2025 proved challenging for the garment sector, Odlo's financial position provided stability and flexibility to navigate the uncertainties.

Odlo has a sourcing strategy addressing influencing labour conditions and focusing on long-term relationships with its suppliers. The member has 36 active suppliers, including factories for supporting processes. In the previous financial year, Odlo sourced 42% of its production from its own factory in Romania, which manufactures exclusively for Oslo. Odlo's sourcing strategy explicitly focuses on increasing influence through consolidation.

In the previous financial year, the member brand has focused on strengthening its risk scoping and risk assessment. Odlo has a risk analysis aligned with the Organisation for Economic Co-operation and Development (OECD) guidelines. The member brand conducts risk scoping and includes all risk factors: country, sector, business model, sourcing model and product level. Odlo conducts risk scoping and includes all eight labour standards. It uses Fair Wear's Risk Scoping Tool and country studies, as well as other external sources, to identify country risks and the likelihood and severity of the risks, and then classifies the risks into a risk level and a risk matrix. It has identified various monitoring tools for production countries.

Additionally, Odlo has focused on several other topics, like implementing a new supplier evaluation system. The results are shared with some of Odlo's suppliers and directly influence sourcing decisions.

Since 2024, Odlo is part of a living wage project, organised by Sustainable Textiles Switzerland 2030 (STS 2030), which is a multi-stakeholder program with the mission to make a contribution to achieving the Sustainable Development Goals (SDGs) in the Swiss textile and clothing sector. Together with other brands from Switzerland, Odlo is creating a roadmap for the payment of living wages for its Vietnamese factories. Fair Wear encourages Odlo to continue its efforts to support the payment of higher wages. This could be realised by a step-by-step implementation plan agreed upon with the trade unions, worker representatives and suppliers. Long-term contracts for the supplier are beneficial to support this process.

Odlo also understands the status of FoA at each of its suppliers. The member has factory-level monitoring in place to assess and collect information. Fair Wear recommends that Odlo continue its work to empower freedom of association (FoA).

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 Odlo International AG

Member company information

Member since: 1 Jan 2008
Product types: Sportswear
Percentage of turnover of external brands resold 0%
Member of other MSI's/Organisations OEKOTEX, Cascale, EOG and Swiss Textiles Switzerland S2030
Number of grievances received last financial year 2

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

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

Production Country	Number of production locations	Percentage of production volume
Romania	5	44%
Viet Nam	10	22%
Sri Lanka	3	12%
Thailand	2	9%
Türkiye	3	9%
Cambodia	1	1%
China	3	1%
Italy	3	1%
Portugal	2	0%
India	2	0%
Slovenia	2	0%

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: Odlo 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: Odlo 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: Odlo 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: Odlo has a sourcing strategy addressing influencing labour conditions. The member has 36 active suppliers, including factories for supporting processes. 74% of the production volume comes from suppliers where the member has at least 10% leverage. This is an increase of more than 10% compared to the previous financial year. 7% of the production volume comes from suppliers where Odlo buys less than 2% of its total FOB. In the previous financial year, Odlo sourced 42% of its production from its own factory in Romania, which manufactures exclusively for Odlo.

Odlo's sourcing strategy explicitly focuses on increasing influence through consolidation. During the Brand Performance Check, Odlo could show a solid plan to proceed with the consolidation. Since the previous financial year, the member brand has also focused on increasing its influence through active cooperation with other clients.

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: Odlo has a sourcing strategy that focuses on maintaining long-term relationships. 88% of the member's total FOB volume comes from suppliers with whom Odlo has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Odlo to commit to long-term contracts.

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

Comment: Odlo has a risk analysis in line with the OECD requirements. The member brand conducts risk scoping and includes all risk factors: country, sector, business model, sourcing model and product level. Odlo conducts risk scoping and includes all eight labour standards. It uses Fair Wear's Risk Scoping Tool and country studies, as well as other external sources, to identify country risks and the likelihood and severity of the risks, and then classifies the risks into a risk level and a risk matrix.

Odlo identified that its business and sourcing model, especially focusing on long-term and direct supplier relationships, decreases several risks across most labour standards. With a two-season production cycle, suppliers benefit from longer lead times and greater planning security. The focus on more technical and complex products, combined with a four-year product life cycle and a strong NOS (Never Out of Stock) programme, ensures continuity in key styles and materials. This continuity allows suppliers sufficient time to source materials and plan production, which, for instance, reduces the risk of excessive overtime. The risk scoping shows a high risk for discrimination as well as sexual harassment of women in India and Bangladesh. The risk scoping includes a gender lens. Input from local stakeholders is included in the risk scoping by using information from websites of Non-Governmental Organisations (NGOs) working in the garment sector and information from factory visits, supplier surveys and updates on country information during supplier meetings.

At the country level, the highest overall risks are identified in India, Türkiye, Vietnam, Cambodia, and China. China presents high risks, particularly regarding excessive overtime hours and freedom of association (FoA), but India also shows several high risks for FoA and excessive overtime. The risk scoping includes a gender lens. The risk scoping shows a high risk for discrimination as well as sexual harassment of women in India. Input from local stakeholders is included in the risk scoping. Odlo assessed the prevalence of forced labour in China as not a high risk, while several sources indicate otherwise.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making, and different departments are involved in this process. For example, Odlo identified in its sourcing model risk scoping that working with intermediaries increases risks for many labour standards and sector risks. Therefore, Odlo commits to sourcing directly with factories to ensure transparency and values direct relationships. Based on risk scoping, Odlo's sourcing decisions are increasingly risk-informed. There is higher monitoring in India, and a strategic focus on countries such as Vietnam, Romania, and Sri Lanka. The member brand is shifting volumes from higher-risk countries, such as Cambodia, to Vietnam.

Odlo's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear strongly recommends Odlo to privilege countries where workers can freely form or join a trade union and/or bargain collectively, and make this explicit in its sourcing strategy. The member is urged to assess the risk of forced labour in its supply chain.

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 Odlo to inform new suppliers about Fair Wear membership. Odlo defined an onboarding process for new suppliers as part of its sourcing strategy, under the Responsible Business Conduct (RBC) policy. The process applies before placing the first order. Before starting production, Odlo sends out information about Fair Wear membership, as well as the Fair Wear CoLP, the Worker Information Sheet (WIS) and the RBC policy, and the brand has a dialogue with its suppliers about Fair Wear's requirements and how to cooperate in implementing them.

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: Odlo collects human rights information of potential new suppliers by collecting Fair Wear's supplier questionnaire, collecting existing audit reports and, when possible, visiting them. The member defined a 7-step plan for onboarding a new supplier. In the first steps, Odlo analyses the supplier's performance, especially on product quality and sourcing conditions. In the next step, the member brand requests further information from the potential supplier via a questionnaire to collect more detailed data on subcontracting partners. Odlo visits the production location of a potential supplier before placing the first order. In addition, Odlo asks new suppliers to complete its questionnaire to collect more detailed information on working conditions at the new production location. Based on the risk assessment, the Corporate Social Responsibility (CSR) team will share a summary of the evaluation with the purchasing department. The decision to engage a new supplier is made by the Supply Chain Director. The signed CoLP and the posted Worker Information Sheet (WIS) are still missing for two subcontracting partners (supporting processes) in Thailand and Vietnam. Two new production locations were onboarded in 2024/2025, including one subcontracting partner for supporting processes in Vietnam. Furthermore, Odlo's production was relocated to another factory operated by the same supplier in India due to a building fire. Odlo visited the factory. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear strongly recommends also collecting the CoLP and the posted Worker Information Sheet (WIS) information for subcontracting partners. Fair Wear strongly recommends Odlo 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.

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: In the previous financial year, Odlo added two new factories. The brand has shared information about Fair Wear's CoLP and the complaints helpline during the sustainability assessment ahead of the supplier being chosen. The Worker Information Sheet has been posted. For conducting onboarding training sessions, Odlo focuses only on direct suppliers for the final product assembly, not on subcontracting partners. For those partners, Odlo introduce and raises awareness of Fair Wear CoLP and the complaints helpline.

A Fair Wear onboarding session for one supplier in China, which was onboarded in 2021, was conducted to raise awareness about the Fair Wear CoLP and the grievance mechanism. The onboarding sessions included discussions to raise awareness about social dialogue.

Recommendation: Odlo is recommended to organise onboarding sessions for all its new suppliers, including subcontracting partners. Odlo is recommended to organise onboarding sessions specifically focusing on the CoLP and the grievance mechanism within the first year of doing business.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Advanced	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.	6	6	0

Comment: Odlo has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. Based on the outcome of its risk scoping and risk assessment, the member brand has identified the different monitoring tools for production countries. It has identified the right tool and frequency per country. For conducting its risk assessment on the factory level, Odlo uses mainly Fair Wear factory assessments and Corrective Action Plan (CAP) findings, which include worker and stakeholder input and other third-party audits in its monitoring. Additionally, the risk assessment on the factory level includes information from the member brand's supplier survey, grievances and onsite visits. The risk assessment does include an assessment of the likelihood and severity, and a risk matrix. The highest risks were identified for suppliers in China, Türkiye and India about FoA, excessive overtime and living wage. In general, the factory-level risk assessment generally indicates a lower likelihood of risk than the country-level. However, certain country risks are reflected at the factory level, particularly regarding FoA in Türkiye, Vietnam, and China. For its own production facilities in Romania, Odlo has a local team for frequent monitoring activities. Additionally, Odlo has a local quality control team in China who also sometimes conduct health and safety checks in factories in China, Thailand and Vietnam. The staff from the purchasing department visit the suppliers on a regular basis and provides feedback through visit checklists.

Odlo includes a gender lens in its risk assessment. However, the member brand identified that discrimination is difficult to assess. To address this, worker surveys have been conducted, particularly focusing on gender-related aspects and strengthening data collection (see indicator 2.9). In addition, living wage data is collected through a separate, more in-depth assessment tool that also feeds into and strengthens the overall risk assessment process. Some information gaps remain, mainly for factories in Portugal. However, the risk assessment is done for all factories and provides a strong overview and clear direction for prioritising further actions.

FoA is identified as the highest risk, particularly in factories in Türkiye and China, where critical findings have been identified. A worker survey was arranged to better understand awareness and perceptions of FoA and trade unions. In Vietnam, excessive overtime remains a high risk across all factories. As an additional monitoring tool, Odlo has introduced an overtime tracking system.

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).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: Odlo has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. To identify the risks, Odlo mainly uses Fair Wear country studies and information from the International Trade Union Congress (ITUC) Rights Index. Odlo identified the following production countries in its supply chain that show the highest risk: China, India, Türkiye and Cambodia. The risks to FoA are included in the detailed risk assessment overview. The main risks identified are limited freedom of speech and the undermining of FoA and collective bargaining agreements (CBAs) by state unions (China). Based on factory assessment data, Odlo identified that factories in Türkiye infringe workers' rights to organise. In most cases, no independent union or workers committee was identified.

Odlo uses this information to understand the risks at its suppliers and to inform how it engages with its suppliers on this topic. Odlo understands the status of FoA at each of its suppliers. The member has factory-level monitoring in place to assess and collect information. Odlo uses surveys to get a clearer picture of worker representation in factories and of female workers' representation in worker committees. The member knows which factories have trade unions and CBAs in place. In factories in Vietnam, for example, unions are present in factories and workers appear to be comparatively more involved. In China, the establishment of independent unions is restricted, and suppliers are not required to have a union. In Türkiye, it is very rare for factories to have a union. Worker representatives are present in every factory; however, their level of involvement and effectiveness in resolving issues is not always clear. In many cases, they appear to play a limited role. The company therefore recognises the need to better understand how worker representatives are elected, who is part of these structures, and how actively they contribute to addressing workplace concerns. For some factories, there is still a lack of transparency regarding the election process and composition of worker representation bodies.

Odlo identified that women are often underrepresented in unions and worker representative structures, despite being a significant number of the workforce. Odlo analysed that while discrimination risks for women appear to be lower in Vietnam compared to some other countries, women are less frequently involved in formal representation roles, which are often dominated by men.

Recommendation: Odlo is recommended to deepen its communications with factory management, worker representatives and/or local unions (where appropriate), and other local stakeholders to deepen its understanding of FoA.

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: Odlo has included gender in its human rights risk identification. The member could show that it understands gender risks for its sourcing countries.

Additionally, Odlo actively collects gender data for its main production locations. Odlo sends questionnaires to suppliers, including questions with a gender lens. The member brand collects mainly data on discrimination (discrimination in hiring practices, supervisor roles, differences in wage levels and/ or employment terms). Odlo knows which factories have an anti-harassment committee in place.

Odlo has started to analyse the collected gender-disaggregated data at the factory and country levels. At one supplier in China, company policies were reviewed, including a 'Female Protection Policy' that covered non-discriminatory practices and the prevention of gender-based violence. In Sri Lanka, significant gaps were identified at a large supplier, requiring further clarification of figures and follow-up communication to ensure accurate understanding and transparency. Strengthening the data collection remains an important tool for Odlo.

Recommendation: Fair Wear recommends that the member continue analysing the gender data collected at the country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Advanced	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.	4	4	0

Comment: During the financial year 2024/2025, Odlo updated its supplier evaluation system. Suppliers' human rights performance is systematically evaluated on a regular basis using a scorecard methodology. The scorecard is based on clear Key Performance Indicators (KPIs) and defined scoring principles, including 'must'-indicators such as partnership length and leverage. It also combines business criteria such as on-time delivery, lead times, pricing, open costing, payment terms, communication, and innovation. Human rights indicators include grievances, gender, wages, union/worker representation, and overtime. Wages are prioritised because they are closely linked to many other labour rights issues and therefore central to prioritisation.

The scorecard is relevant for all main suppliers, not yet for subcontracting partners. Results are shared with most of Odlo's suppliers and directly influence sourcing decisions. Low-performing suppliers may face closer monitoring, corrective actions, or potential exit. Overall, the scorecard serves not only as a monitoring tool but also as a basis for collaboration, aligning production, sourcing, and sustainability efforts while raising internal awareness.

Recommendation: Fair Wear recommends Odlo 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: Odlo uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. Next to that, it assesses the production capacity of the factory, including available production processes. This way, the member can check if the order is feasible for the factory. For its own factory in Romania, Odlo has close cooperation with this production location. Staff from the purchasing department visit the production location in Romania on a regular basis. Odlo has a local team in China for quality checks as well. The team visits production locations in China, Vietnam and Thailand frequently. Odlo has written contracts with its suppliers. The contracts include that unauthorised subcontracting is not allowed. There is no evidence of missing first-tier locations in the database.

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: Odlo has identified whether homework is prevalent in its sourcing countries. The member brand has a homeworker policy, which is part of the supplier contracts. Odlo assessed which products are at risk for use by homeworkers. According to the member, there is a very low risk of homeworkers being used by its suppliers. Odlo mostly relies on information from Fair Wear factory assessments, third-party audits and factory visits.

A 2019 factory assessment identified one finding related to 'Noncompliance with legal requirements regarding subcontracted or home workers' in a factory in Thailand. In 2024, another factory assessment in the same factory mentions that there were no actions recorded, and the finding is therefore closed as inconclusive. However, Odlo identified that the high risk of migrant-workers still remains. Therefore, Odlo implemented several preventive actions, like engaging with management to implement policies and worker-rights training sessions. Despite these efforts, the supplier consistently scored among the lowest in our performance scorecard. As part of Odlo's consolidation strategy, the brand decided to exit the supplier.

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

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	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: Odlo uses contracts with its suppliers. The member brand has different contracts for its suppliers, especially regarding price and payment. All contracts include topics of liability and penalties for late deliveries. Although the contract includes the Fair Wear membership and the CoLP, it does not support human rights due diligence because an unequal burden is placed on the supplier by having penalties for non-compliance with the confirmed delivery date and by making the supplier liable for defective products without any proof of fault by the supplier. In general, the supplier has 15 calendar days after receiving the purchasing order to provide a later delivery. This needs to be accepted by Odlo. In case of late deliveries within the cure period of 10 days late to the confirmed estimated time of departure (ETD), the supplier must pay the cost of the airfreight minus sea freight after eight days. For late delivery of more than ten days, Odlo has different shipping requirements and penalties for the supplier. All suppliers have regular payment terms of 45 to 60 days. In general, the contracts do not yet mention the shared responsibilities of CoLP implementation.

However, in the previous financial year, Odlo drafted a new contractual agreement, also using the Responsible Contracting Project (RCP) to improve the contracts. During this process, Odlo included supplier feedback as well. It has yet to implement the results with all suppliers.

Requirement: Odlo 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 Odlo to include the shared responsibility of CoLP implementation in its contracts, including fair payment terms.

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. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with Key Performance Indicators (KPIs), supporting good sourcing and pricing strategies.

Recommendation: Odlo could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments. Odlo 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: Odlo has strong systems in place to plan production in a way that supports reasonable working hours. The brand shares styles per order, has a system in place with forecasting, is aware of production capacity for most suppliers and discusses and agrees on lead time with suppliers. Odlo has a system to place and track orders for materials and production. This allows Odlo to detect possible problems and set production priorities with the supplier. Odlo places orders well in advance, spread across several buys. The purchasing department also ensures the quantities are spread evenly over the different buys. The suppliers receive the planning monthly and then are asked if they are comfortable with it. This happens about seven to eight months before the shipping date. Odlo does not make any late changes to orders; the orders can only be placed when the product is ready to be made. Around 30-40% of the products are never-out-of-stock articles (NOS), depending on the season. For the other products, Odlo produces two ranges each year, an Autumn/Winter range and a Spring/Summer range.

Odlo evaluates the production process, especially together with its own factory in Romania, and plans to place orders in the low season to avoid peak seasons.

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.	Advanced	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.	6	6	0

Comment: Odlo includes open costing in the contract with its suppliers. It also has a pricing policy as part of its RBC policy, which is shared with suppliers as well. All suppliers are asked to share the number of sewing minutes and the minute cost, the margin and the overhead costs. Odlo receives this information from most of its suppliers. Not in all cases are the labour minute calculations verified. As the minute calculations are not verified, it is unclear how the open costing translates into accurate prices. When a price is found to be too high by the brand, it works on simplifying the samples to engineer a lower price. The labour costs are fixed and not negotiable. Nevertheless, the member brand sometimes negotiates the profit of the supplier, which is shown in the costing overview. Generally, when suppliers asked for a higher price in the past financial year because of rising costs, the brand accepted this and increased the selling price of the product. Every year, Odlo requests wage data from its suppliers through our Factory Wage Data survey to measure the gap from living wage benchmarks. Additionally, Odlo also verifies wage data through factory assessments. With this overview, the member brand has a direct link to labour costs and wage levels for its main suppliers. For some suppliers, Odlo is missing detailed data to apply the labour-minute costing methodology to calculate its buying prices.

Recommendation: Odlo is recommended to investigate why some suppliers are reluctant to work with Fair Price or any other form of fact-based costing, if needed, with the support of Fair Wear's local teams. Fair Wear also recommends not negotiating suppliers' profit.

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

Comment: Odlo works with intermediaries for its production and order placement in Italy, Portugal and China. Odlo has informed all its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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

Layer 3 Prevention, mitigation and remediation

Possible Points: 96
Earned Points: 72

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.	Advanced	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.	6	6	0

Comment: Based on the risk identification described in Chapter Two, Odlo has linked all of its factories to appropriate follow-up for factories covering all its suppliers. The member uses the Fair Wear platform to connect its risk assessments and audit findings to time-bound actions per factory and prioritises which countries fall under the enhanced monitoring programmes.

Several actions have been identified. In Türkiye, several actions related to raising awareness of social dialogue were implemented. As a next step, dialogue training will be implemented to strengthen internal grievance mechanisms. In India, the focus is on including collaboration with other Fair Wear member brands and worker representatives. A key finding is that sewing operators are paid on a piece-rate basis rather than receiving monthly wages, which will be addressed jointly with other brands. In Italy, production is organised through an intermediary; the focus is mainly on monitoring. In Vietnam, the main focus area is on reducing excessive overtime management.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: Odlo has started collecting data on gender-related risks per production country and partly per production location. However, the member brand has yet to incorporate that into the prevention and improvement actions per production location. Odlo mentioned to focus on actions related capacity building in the future. At one supplier in China, company policies were reviewed, including a 'Female Protection Policy', covering non-discriminatory practices and prevention of gender-based violence (see indicator 2.9). Based on this review, suggestions for improvement were provided.

Recommendation: Odlo 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: Odlo included comprehensive steps to encourage FoA and effective social dialogue in its action plans. Several actions have been identified, and the member brand has started to implement these steps. In two factories in Vietnam and China, Odlo conducted a Fair Wear Communication and Factory Dialogue Programme. The training focuses on management-worker dialogue within factories, which can improve communication and help address grievances and concerns in a timely manner. In one factory in Thailand, Odlo identified high risks related to migrant workers from Myanmar. A training programme was implemented in the factory. The training programme was verified by Fair Wear. In Türkiye, Freedom of Association (FoA) is the main risk and has been prioritised. Root causes were assessed, including whether workers fear joining unions, which is closely linked to the effectiveness of grievance mechanisms. A worker survey was conducted in two factories with support from the Fair Wear Türkiye team, who verified the data and provided feedback. Based on the findings, a Corrective Action Plan (CAP) was developed and submitted. As a next step, dialogue training will be implemented to strengthen internal grievance mechanisms. While there are worker representatives, there is no union at the factory level, and the effectiveness of representation remains a concern. The member has yet to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: Odlo is strongly encouraged to ensure worker representatives are involved in the steps that the member takes to promote freedom of association and effective social dialogue. Fair Wear also recommends Odlo to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports 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: Odlo supports and monitors its suppliers' internal grievance mechanisms at the start of a business relationship. The member brand extended the annual supplier questionnaire with questions on internal grievance mechanisms. In addition, Odlo analyses factory assessment reports to get a better understanding. Odlo monitors the effectiveness of internal grievance mechanisms via factory assessments and during onsite visits or upcoming complaints, and asks follow-up questions in the CAP in case of findings. Especially for the member brand's own factory in Romania, Odlo actively supported the implementation of an effective internal grievance mechanism. However, the member has yet to actively support internal grievance mechanisms at the other suppliers.

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

Recommendation: Fair Wear recommends Odlo to respond when factory-level grievance mechanisms are not functioning. Fair Wear also recommends Odlo to ensure that the evaluation of factory-level grievance mechanisms of its suppliers is systematically considered in purchasing decisions.

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

Comment: Odlo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and grievances. Odlo has not yet cooperated with customers who are not Fair Wear members. The brand has yet to initiate cooperation with other customers of its suppliers. Odlo does cooperate with customers who are not Fair Wear members. Next to that, the member also cooperates in taking more preventive measures, such as joint living wage work with other brands, organised by Sustainable Textiles Switzerland 2030 (STS 2030).

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	30%	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.	2	6	-2

Comment: In the past financial year, Odlo received six Fair Wear factory assessments and three external assessments from factories in Türkiye, Vietnam, Romania, Thailand, China and India. During the performance check, the member could demonstrate that it has followed up on one-third of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year, 2024/2025. Improvement actions include health and safety findings, worker representatives were not democratically elected or written policies and procedures were missing. Odlo has shown that it also followed up on more structural and complex issues, such as living wages and excessive overtime hours. Some of the CAP actions were shared with other Fair Wear members. However, many actions are still open or in progress in order to solve the findings.

Recommendation: Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of ODLO to actively follow up on CAP issues are in line.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	4	6	-2

Comment: Odlo is using Fair Wear's Member Hub platform to work with suggested preventive actions for its supply chain, based on identified risks and findings in its factories. Odlo has identified root causes of the CAP issues, especially related to health and safety findings or lack of effective internal grievance mechanisms and discussed these with its suppliers. Odlo also identified that the lack of FoA and social dialogue in the factories is one of the main root causes for many CAP issues. The member is aware that most workers are unaware of their rights regarding FoA and the right to collective bargaining. Additional findings relate to gaps in internal grievance mechanisms and health and safety conditions. Issues include inadequate health and safety working conditions, limited preventive measures, and ergonomic concerns such as insufficient seating arrangements. While some factories have initiated health and safety training and invested in improvements, these efforts are not always regular or systematic. In certain cases, responsibility for social compliance, including health and safety, is concentrated in one person, which may limit effective oversight.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no action plan is needed.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

Comment: Odlo has some suppliers (subcontracting partners) where action plans are not needed. These cover less than 1% of the member's total FOB. In general, Odlo has an action plan for all its direct suppliers. In the previous financial year, Odlo conducted a risk assessment for all factories, including subcontractors and has an action plan for all of them, depending on the level of risk. Odlo requires recent factory assessment reports, also for subcontracting partners, if available, and the member brand discusses findings. Odlo also extended its supplier questionnaire to subcontracting partners, focusing on the topic of wages and gathering information on FoA and gender equality. The member brand discusses the outcome regularly with these suppliers and regularly reviews changes to the risk situation. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

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

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

Comment: In the previous year, six Fair Wear factory assessments were conducted. Odlo received three external audits. In two factories, one in Türkiye and one in Vietnam, excessive overtime was found. In both cases, the total working time per week exceeds 60 hours, and workers do not receive one day off per seven days of work. In general, excessive overtime was also identified in China, Türkiye, Vietnam, and Thailand in previous assessments. Root cause analysis indicates structural labour shortages, difficulties in finding skilled workers, and increased competition from other industries (particularly in Vietnam), alongside significant wage increases. These factors contribute to production pressure and extended working hours.

Excessive overtime is systematically monitored through an overtime tracker that records both the extent of overtime and the number of affected workers. Root causes are also analysed to better understand structural issues behind peak workloads. Odlo is working on spreading order volumes more evenly, particularly by better balancing quantities during the low season. Open dialogue with suppliers is ongoing, including discussions on production planning and capacity evaluation. As Odlo consolidates its supplier base, it gains more leverage with main suppliers, creating opportunities to flatten demand and distribute production more evenly throughout the season. This is, however, a longer-term process that also requires assessing sewing minutes and realistic capacity planning. For factories where leverage is lower, improvements are addressed on a case-by-case basis. In some instances, long material lead times, especially for specific products such as T-shirts, result in bundled production later in the season, contributing to overtime peaks. Odlo could not yet show that its efforts resulted in reduced excessive overtime at this one supplier in Türkiye and one supplier in Vietnam. However, due to follow-up assessments for some factories, Odlo has validated evidence that for one factory in China and another factory in Vietnam, findings related to excessive overtime have been solved.

Recommendation: Fair recommends Odlo to verify and validate if excessive overtime could be reduced for all of its suppliers. Fair Wear also 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: In the previous year, six Fair Wear factory assessments were conducted. Odlo received three external audits. One assessment from a factory in China shows that allowances, bonuses or social security benefits are not paid as legally required. Odlo identified that, as many workers are migrants who return to their home regions outside of the city, transferring social security contributions between regions remains complex and challenging. This issue has been raised in discussions with suppliers; however, it remains an open finding. Given Odlo's small leverage, influencing this finding remains challenging for the member brand. However, Odlo is in continuous dialogue with the supplier.

Two assessment reports from one supplier with two production locations in Türkiye stated that wages could not be verified due to inconsistent or incomplete records, and that statutory leave is not paid to workers as legally required. These are recurring findings from a previous assessment. The member brand is in dialogue with the supplier to identify the root causes. As both assessment reports were delivered after the financial year had closed, the status of the findings will be further evaluated in the next Brand Performance Check.

Due to follow-up assessments for two factories in Vietnam in 2025, Odlo has validated evidence that the findings related to 'wages could not be verified due to inconsistent or incomplete records' and 'allowances, bonuses or social security benefits are not paid as legally required' have been solved.

Recommendation: Fair Wear strongly recommends Odlo to always verify whether legal minimum wage issues have been resolved. Odlo 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: Odlo has an extensive overview of the wage levels at all of its suppliers. The member brand understands which suppliers pay wages below living wage estimates. Odlo analyses the basic wage paid in the factory as well as the current wage paid (the lowest wage and the mode wage), and tries to collect data to identify the gender wage gap where possible. Odlo takes the data from regular supplier questionnaires and factory assessments. As a comparison, Odlo uses the Anker estimates (Global Living Wage Coalition) or WageIndicator living wage estimates. Odlo identified the root causes of wages lower than living wages in production locations. In Türkiye and Sri Lanka, for example, this is mainly due to the high inflation. Additionally, the company's low leverage in negotiating wages with suppliers further complicates efforts to close the wage gap, creating additional obstacles in achieving a payment of a living wage. Odlo's also espeically focusses on the topic of wages for its own factory in Romania (49% FOB), as this is where the brand can most easily make an impact (see also indicators 3.12 and 3.13). The member has yet to develop a systemic and time-bound approach to get wages increased towards a living wage.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	4	6	0

Comment: Since 2024, Odlo is part of a living wage project, organised by Sustainable Textiles Switzerland 2030 (STS 2030), which is a multi-stakeholder program with the mission to make a contribution to achieving the Sustainable Development Goals (SDGs) in the Swiss textile and clothing sector. Together with other brands from Switzerland, Odlo is creating a roadmap for the payment of living wages for its Vietnamese factories. The goal is that 50% of its factories will pay a living wage by 2030. In terms of production volume, over 60% achieves a living wage payment (considering that Odlo Romania pays a living wage and produces around 42% of our overall volume).

Recommendation: Fair Wear encourages Odlo to continue its efforts to support the payment of higher wages by defining the next target wages that go beyond the CBA agreements. This could be realised by a step-by-step implementation plan agreed upon with the trade unions, worker representatives and suppliers. Long-term contracts for the supplier are beneficial to support this process.

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.	43%	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.	4	6	0

Comment: The wages at Odlo's own production location in Romania have increased to the set target wage. Worker representation has been involved in the process, and a new CBA was negotiated. 42% of Odlo's FOB was produced at this factory in the past financial year. Three factories in Italy, accounting for less than 1% of FOB, are included in the CBA payments for the garment sector in Italy.

Three factories in Vietnam (18% FOB) show that their mode wage (including benefits) reaches the Anker (Global Living Wage Coalition) living wage estimate. However, that is not the case for all workers in the factory, especially not for the lowest-paid workers. Therefore, these factories will not be included in this calculation.

Recommendation: Odlo is encouraged to roll out its approach 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.	Advanced	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.	4	4	-2

Comment: Odlo received two grievances in the previous financial year about 'safe and healthy working conditions', 'no discrimination' and 'legally binding employment relationship from its own factory in Romania. The complainants mentioned continuous stress, discrimination, as well as verbal and physical harassment from supervisors. These cases have also been reported internally. Therefore, Odlo sees this topic as a more systemic pattern rather than isolated incidents. To better understand the situation and identify root causes, Odlo implemented a worker survey to identify preventive measures. One root cause that was identified is that the factory has recently undergone significant changes in staff, and new personnel joining, which has limited the ability to implement concrete measures so far. In addition, there was no designated responsible person to follow up on this topic, which further delayed progress. As a next step, Odlo plans training programmes that could support preventive action and help define concrete corrective measures.

Another grievance was raised in a factory in Vietnam, where Odlo has not placed any orders since the previous financial year. The complaint was about 'non-payment of living wages', and 'legally binding employment relationship'. Odlo cooperated with other Fair Wear member brands to solve the grievance.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Intermediate	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.	4	6	0

Comment: In the past three years, six suppliers from Vietnam, Türkiye, and China have been enrolled in different training programmes. Three suppliers have been enrolled in Fair Wear's Workplace Education Programme (WEP) Basic module. One location in Vietnam participated in the WEP Communications. Odlo conducted a third-party training programme, focusing on social dialogue and FoA, with its Turkish supplier. With this training, Odlo informed workers about their rights in general, with a focus on FoA. The training programme was verified by Fair Wear. Additionally, an onboarding training has taken place at one production location in China. Odlo has some CAP findings where training is a recommended follow-up action.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	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: The member brand started a dialogue with its suppliers about the outcome of the training. Odlo does use the training results as input for Odlo's human rights due diligence by creating action plans for suppliers, including these in CAPs. Additionally, Odlo uses outcomes from training reports for its risk assessment.

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.	Advanced	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.	4	4	0

Comment: Odlo's sourcing strategy includes a responsible exit strategy. In the past financial year, the member stopped with four suppliers in Romania, Italy and China, mostly subcontracting partners for supporting processes. The responsible exit strategy includes specific steps, such as an analysis of the impact based on the leverage, identification of the risk of layoffs and involving additional stakeholders throughout the process. Odlo defined to inform the supplier about the exit as soon as possible, at least one season ahead. The member brand also mentions a phase-out plan for production orders with a clear timeline; worker representatives must be consulted. All suppliers were exited for commercial reasons. Part of the process here was to inform the suppliers about the exit as soon as possible. Odlo checked on the impact on workers.

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: Odlo undertakes activities related to human rights that go beyond Fair Wear's scope, namely, collecting data through different monitoring tools from all deeper-tier suppliers to conduct a detailed risk assessment.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22
Earned Points: 16

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: Odlo communicates accurately about Fair Wear membership on its website. The member also uses other channels, such as social media channels, to inform customers and stakeholders about Fair Wear membership. Odlo also use a hangtag on garments with the Fair Wear Logo.

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

Comment: Odlo 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: Odlo has submitted its social report, which was reviewed by Fair Wear. Odlo has 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: Odlo publishes its production locations on its website. It does not include remediation results or a time-bound improvement plan for each supplier.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

Comment: Odlo has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. The internal evaluation system involves top management. In its evaluation system, the member brand does not yet include triangulated information from external sources.

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

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

Comment: The previous performance check included two requirements. Odlo followed up on 75% of the requirements that were addressed. Odlo actively worked on all the other requirements too, related to extending its risk profile and regular dialogue with factories where no action plan is needed (indicator 3.8), and started drafting new contract templates related to its requirement of indicator 2.13.

5 Appreciation chapter

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

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

Comments: Odlo participates in the Sustainable Textiles Switzerland 2030 (STS2030) 'United for Fair Wages' project. Together with other brands, the Swiss government and Multi-Stakeholder-Initiatives (MSIsI such as Fair Wear, amfori and Swiss Fair Trade and ILO, we are working to advocate for fair wages in Vietnam.

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

Recommendations to Fair Wear

Odlo noted that Fair Wear provides substantial data, practical recommendations, and ongoing support, all of which are highly valuable for strengthening due diligence processes. However, certain topics remain complex and not fully clarified, particularly regarding wages and the underlying methodology for measuring and assessing living wage progress.

There is a need for greater alignment with other Multi-Stakeholder Initiatives (MSIs) to ensure a more harmonised and broadly applicable approach beyond Fair Wear membership. Currently, different methodologies for measuring, collecting, and analysing wage data create complexity for member brands and can also be challenging for suppliers to navigate. A more standardised and aligned framework would not only support brands in implementing consistent wage assessments but would also make expectations clearer and more manageable for suppliers.

Odlo also mentioned that it hopes for a better process for accessing capacity and knowledge from Fair Wear's Human Rights and Business Advisors, especially on certain topics where Odlo needs further guidance. In the previous financial year, Odlo lacked guidance from its Human Rights and Business Advisor.

Brand Performance Check details

Date of Brand Performance Check: **21-01-2026**
Conducted by: **Victoria Lauer**
Interviews with: Sara Campidelli (Sustainability Manager)
Daniel Eppler (CEO)
Davide Arsie (COO)
Matthieu Leclerq (Director of Sourcing)
Johanna Heimlicher (Director of Sustainability)
Andrin Zinner (Team Lead Accouting)
Tom Clive (Chief of Staff)