Brand Performance Check

Jack Wolfskin

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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. The online Brand Performance Check Guide provides more information about the indicators.

Scoring overview

Total score: 132
Possible score: 208
Benchmarking Score: 63
Performance Benchmarking Category: Good



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%	76%	73%	69%	53%	58%	55%

Summary:

Jack Wolfskin has shown progress and met most of Fair Wear's performance requirements. With a total benchmarking score of 63, the member is placed in the Good category. Jack Wolfskin's sourcing strategy is designed to influence and improve labour conditions. The member company continues to consolidate its supply chain and now sources predominantly from suppliers where it has substantial leverage. It also maintains a high proportion of long-term partnerships, although it has not yet committed to long-term contracts. The sourcing strategy is not yet fully formalised into a single document. While risk scoping informs sourcing decisions, the company does not privilege sourcing countries where freedom of association can be exercised freely, and sourcing decisions have not yet changed based on risk assessment outcomes. Jack Wolfskin has a systematic approach for identifying and monitoring human rights risks. The brand conducts risk assessments for every production location and integrates country, sector, business model, and gender-specific risk factors. The company has mapped freedom of association risks and includes a gender analysis throughout its human rights due diligence. However, improvements are still needed in using risk assessment outcomes to influence sourcing decisions and to strengthen the supplier human rights due diligence performance processes.

Jack Wolfskin sources from three production locations in Bangladesh, representing 24% of its total FOB. The member company has not signed the International Accord. Two factories are covered by the RMG Sustainability Council (RSC), while the third is awaiting enrolment, but is already confirmed by the RSC. Jack Wolfskin sources from two production locations in Myanmar, representing 11 percent of its total FOB. Despite Fair Wear's strong recommendation to exit, the member company decided to stay. It has developed substantial action plans reflecting key risks and conducts heightened human rights due diligence through the MADE in Myanmar SMART Factories Programme and regular third-party audits. The member company can show certain improvements, such as above-minimum-wage payments.

Jack Wolfskin prioritises risks and develops action plans per production country, and not per production facility. It integrates Accord and RSC findings into its Bangladesh programme and conducts heightened due diligence in Myanmar. Action plans increasingly reflect gender analyses, though the systematic incorporation of gender-sensitive measures still needs strengthening. Steps to encourage freedom of association exist, such as quarterly check-ins with factory-level unions in Vietnam, but these practices are not yet consistently applied across all suppliers. The member company systematically supports factory-level grievance mechanisms, including promoting the Fair Wear helpline.

Jack Wolfskin followed up on less than half of all outstanding actions from the previous Brand Performance Check but could show progress on requirements in Bangladesh. The member contributes financially to remediation when required through its costing exercise. Work on living wages remains limited. While wages in its production countries exceed the legal minimum, the company has neither established target wages nor implemented a clear strategy for financing wage increases, except for Myanmar.

Jack Wolfskin maintains a systemic human rights due diligence approach, with structured monitoring, meaningful supplier engagement, and strong grievance handling. The most significant progress was made in consolidating the supply chain, strengthening risk-based monitoring, and supporting remediation efforts, particularly in Bangladesh and Myanmar.

The key challenges remain the absence of a sourcing preference for countries with strong freedom of association, limited structural progress on living wages, and the need for more comprehensive implementation of freedom of association and gender-sensitive measures.

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 Jack Wolfskin

Member company information

Member since: 1 Jan 2010
Product types: Accessories, Footwear, Outdoor wear and outdoor products, Sportswear and Bags and luggage
Percentage of turnover of external brands resold 0%
Member of other MSI's/Organisations Cascale, EOG and European Outdoor Group, Outdoor Industry Association, BSI (Federal association on sporting goods Industry), bluesign®, TMC-Microfibre Consortium
Number of grievances received last financial year 4

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
Viet Nam	14	25%
Bangladesh	3	24%
Cambodia	7	18%
China	15	17%
Myanmar	2	11%
Indonesia	8	3%
Türkiye	1	1%
Germany	1	0%
Romania	1	0%
Slovenia	1	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

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: Jack Wolfskin 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: Jack Wolfskin 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: 66

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: Jack Wolfskin has a sourcing strategy addressing influencing labour conditions. The member company has 53 active suppliers. 65% of the production volume comes from suppliers where the brand has at least 10% leverage. 17% of the production volume comes from suppliers where Jack Wolfskin buys less than 2% of its total FOB. This is an improvement compared to the previous year. Jack Wolfskin's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. While the member brand diversified to mitigate risk in the previous financial year, this year the brand has consolidated its supply chain in a way that is fully aligned with the company's direction: fewer suppliers and more qualitative products. Although the strategy is embedded throughout the company, the member brand has yet to formalise it in a single document.

Recommendation: Fair Wear recommends Jack Wolfskin to write down the framework for its sourcing strategy to ensure its practices are formalised.

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: Jack Wolfskin has a sourcing strategy that focuses on maintaining long-term relationships. 69% of the member's total FOB volume comes from suppliers with whom Jack Wolfskin has a business relationship for at least five years.
The member does not commit to long-term contracts yet.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

Comment: Jack Wolfskin conducts risk scoping and includes all relevant risk factors. The risk brand's approach to risk scoping has not changed since last year. In its risk scoping, the member company correctly assessed the impact and prevalence of risks, including those related to country, sector, business model, sourcing model, and product risks. The brand uses Fair Wear country studies and relevant risk profiles, International Labour Organization (ILO) convention ratifications, The Industry We Want (TIWW) wage studies, as well as general news reports as resources for its desktop research. The risk scoping incorporates a gender lens, with a particular focus on how country-level risks may affect women differently from men. Jack Wolfskin has applied this approach to all risks in all its sourcing countries. The member company has also conducted risk scoping on freedom of association (FoA). However, Jack Wolfskin does not include a preference in its sourcing strategy for countries where workers can freely form or join a trade union and bargain collectively. Input from workers, suppliers, and stakeholders is integrated into the risk scoping process by sharing the human rights risk analysis with worker representatives and collecting their feedback through interviews conducted during third-party audits and training.

Jack Wolfskin has scoped the risks of forced labour in its production countries accurately. In Bangladesh, the member company has also considered heightened risks related to recent political unrest, particularly regarding wage non-payment, overtime, and health and safety issues. Despite Fair Wear's general expectation that member brands start disengagement from Myanmar, the brand remains in Myanmar. According to Jack Wolfskin's risk assessment, the main risks in Myanmar are political instability, FoA, occupational health and safety (OHS), forced labour, child labour, payment of living wages, and excessive overtime. Jack Wolfskin decreased its production volume share in Myanmar by 10% in 2024 compared to 2023. The brand's rationale for staying in Myanmar is based on its commitment to supporting workers and improving labour conditions amidst the challenging political environment. Jack Wolfskin believes its continued presence helps maintain employment for approximately 3,600 workers, 78 percent of whom are women, and ensures adherence to labour standards through regular social audits through the SMART Factories Programme by MADE in Myanmar and the Fair Wear grievance mechanism. By staying, the brand claims to prevent the adverse impacts of withdrawal, such as job losses and deteriorating labour standards, while leveraging its longstanding partnerships with local factories to promote continuous improvement. The member company acknowledges that, because of the military junta and increased human rights and labour law risks, enhanced due diligence measures are required.

Jack Wolfskin is aware of the risks associated with its other production countries and engages in regular dialogue with its suppliers to address them. In Cambodia, the brand has identified women's health and gender-based discrimination as significant risks and discusses with suppliers how they ensure healthy and safe working conditions and prevent discrimination against pregnant workers. In China, the key risks include excessive overtime, non-payment of social insurance, wage calculation issues, and restricted freedom of association. In Vietnam, the member company identified risks to freedom of association and child labour conservatively, which may not fully reflect their importance. The member company has not changed its sourcing decisions based on the outcomes of its country risk assessments.

Recommendation: Fair Wear strongly recommends Jack Wolfskin 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. Fair Wear strongly recommends Jack Wolfskin to adjust its sourcing based on the results of its risk scoping.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: It is the standard process for Jack Wolfskin to inform new suppliers about its HRDD policy and Fair Wear membership by sending information on group level (in 2024, this was still the old owner, Callaway Golf Company). This process has been followed for all 3 suppliers added in 2024. Jack Wolfskin's onboarding process begins with an initial assessment of potential suppliers by the compliance and global sourcing team, including audits to evaluate alignment with Fair Wear standards and social compliance requirements. Suppliers are required to provide relevant documentation, including information on labour practices and working conditions. The brand ensures risks are identified before approval, with audits and supplier feedback forming a key part of the evaluation. Once the supplier meets Jack Wolfskin's social compliance standards, they are integrated into the supply chain, with follow-up monitoring scheduled.

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.	Advanced	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.	6	6	0

Comment: Jack Wolfskin collects human rights information on potential new suppliers by collecting self-assessments, existing audit reports, organising Fair Wear assessments, or third-party audits. The onboarding process includes information collection on internal grievance mechanisms and freedom of association and includes a dedicated form to collect information about the gender composition of the factory. Member company assesses factory specific human rights situation based on self assessment, existing external third party information and worker stakeholder input before placing the first order.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, and social dialogue mechanisms within the first year of starting business.	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: Jack Wolfskin has added 3 new suppliers in Vietnam, China and Cambodia. Within the first year of doing business, Jack Wolfskin shared information about Fair Wear's Code of Labour Practices (CoLP) and the grievance mechanism. The Worker Information Sheet has been posted for all suppliers. Jack Wolfskin has organised onboarding sessions for two of its new suppliers and planned an onboarding training for the other new supplier already to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue.

Recommendation: Jack Wolfskin 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.	Basic	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.	2	6	0

Comment: Jack Wolfskin has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tool and frequency for almost all countries. For instance, the brand assesses human rights risks in all its production locations by enrolling them in Fair Wear's full onsite assessments and external audits, organising monitoring visits at least once a year, conducting desktop research, collecting factory data on internal dialogue structures and collecting gender-disaggregated data. For all its production locations in Bangladesh, the member commissions third-party audits that sit outside of Fair Wear's scope regularly. The member decides on the frequency of enrolling its suppliers in full onsite assessments based on the factory findings. Suppliers without high-risk factory findings are enrolled in a full onsite assessment less frequent, while suppliers with higher-risk findings are enrolled in full onsite assessment every one or two years, depending on the risk level of the factory.

Regarding the Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh: Jack Wolfskin sources from three production locations in Bangladesh. The member has not signed the International Accord. Despite not being a signatory of the International Accord, the member sources from two factories that are monitored in the Ready-Made-Garment Sustainability Council (RSC) programme, and is actively working on getting the final factory enrolled in the programme, which the RSC has already confirmed will happen as soon as possible through direct factory membership. The brand stays informed of the audits and monitoring activities carried out by the RSC, and includes this information in their own monitoring reports. Jack Wolfskin initiates third-party audits on fire and building safety for the factory that is not covered by the RSC yet. The brand has reached out to other member brands active in their factories who are signatories of the Accord to look into collaborating on preventing, mitigating and remediation human rights risks. In addition to standard Corrective Action Plan (CAP) follow-up on RSC audits, the brand ensures that the buying prices cover the needs to support RSC improvements.

Jack Wolfskin assesses human rights risks in Myanmar through periodic country risk scoping updates, drawing on third-party audit results, supplier feedback, and international reports on the political and social context. The member is a member of EuroCham Myanmar and maintains contact with local trade unions to stay informed of developments related to freedom of association and labour rights. The member brand closely monitors its supplier in Myanmar through quarterly factory assessments through the MADE factory SMART programme, complemented by regular external audits, annual monitoring visits, desktop research, and collection of factory-level data on internal dialogue structures and gender-disaggregated workforce data

However, while these information sources provide valuable input, the member has not yet demonstrated a fully systematic and continuous supplier-level risk assessment process in Myanmar, but has made improvements since the last brand performance check. The member brand closely monitors the brands supplier in Myanmar through quarterly factory assessments through the MADE factory SMART programme.

Recommendation: Fair Wear recommends Jack Wolfskin to assess whether the member causes, contributes or is linked to the identified risks. Fair Wear also recommends the member brand to continuously evaluate whether the monitoring tools for its factories in Myanmar are sufficient and, if necessary, reassessing its presence in Myanmar in consultation with stakeholders.

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: Jack Wolfskin has mapped the risks to Freedom of Association (FoA) in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are based on a combination of country-level, industry, and factory-level assessments, which are informed by initial documentation from prospective business partners and audit reports from sources such as Worldwide Responsible Accredited Production (WRAP), International Labour Organization (ILO) Better Work, Sedex, and BSCI. In China, Myanmar and Vietnam, the brand acknowledges significant challenges regarding FoA due to restrictive legal frameworks and practices that impede workers' rights to organise and bargain collectively. In China and Vietnam, state-controlled unions dominate, limiting genuine worker representation and making it difficult to fully comply with FoA standards. In Myanmar, the political instability following the military coup has led to increased violations of labour rights, including FoA. In countries where FoA is legally restricted, such as China and Vietnam, the member company encourages factories to implement workforce dialogue based on democratic principles. It is unclear how the brand addresses limited freedom of association in Myanmar. However, the brand finds it difficult to engage with worker representation directly due to the language barrier and relies on the interviews by the auditing teams.

Recommendation: Jack Wolfskin is recommended to use Tool 2: Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers.

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: Jack Wolfskin has included gender in its human rights risk identification. The member could show it understands the basic gender risks for its sourcing countries and, for instance, identified the gender pay gap, lack of childcare options, and limited maternity benefits as important risks prevalent in Bangladesh, Cambodia and Vietnam. The member frequently engages with factory management in countries where gender issues are more pronounced, discussing topics such as female empowerment, equal opportunity, and training for women's self-empowerment. Jack Wolfskin also highlights the challenges posed by traditional gender roles, such as women's primary caregiving responsibilities, and works with suppliers to promote quality childcare solutions within the workforce. Jack Wolfskin actively collects gender-specific data at each factory. The data it collects includes gender-specific risks related to social dialogue, violence and harassment, health and safety, wages, and leadership. This information is gathered through third-party audits, Fair Wear factory assessments, training sessions, and questionnaires. The member brand also collects and analyses wage data to identify possible gaps based on gender. The brand stores this data and uses it to implement training on women's empowerment programmes and gender-specific initiatives.

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: Jack Wolfskin does not currently evaluate its suppliers' human rights performance. While the member company previously had a formal evaluation system in place, it has yet to re-establish this due to changes in its internal systems. Despite not formalised in a scorecard or overview, the member brand does take human rights due diligence (HRDD) performance into consideration when agreeing on volumes for the next year. This means that factories that are repeatedly not improving on recurring issues, will get less volume. However, this only happens if the factory does not comply with the brands requests for improvement repeatedly.

Recommendation: Fair Wear strongly recommends Jack Wolfskin to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

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: Jack Wolfskin has a policy on subcontracting in their Manufacturing Agreement that all suppliers are required to sign. Jack Wolfskin uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations or subcontractors in the database. The brand does extensive supply-chain mapping to keep track of its production through its monitoring partners. Moreover, any additional production unit that intends to manufacture goods for Jack Wolfskin must be disclosed to the brand and undergo the specified onboarding procedure. If unauthorised subcontracting is discovered, for instance, during an audit, Jack Wolfskin takes immediate action based on discussions with the involved business partner. Depending on the circumstances, the potential and performance of the subcontractor may be assessed, and if deemed suitable, they may be formally onboarded. Additionally, a serious warning is issued to the company against subcontracting without prior notification. Furthermore, subcontracting without approval is explicitly prohibited under paragraph 1.5.6 of the Manufacturing Agreement that Jack Wolfskin has with its suppliers, reinforcing the brand's commitment to maintaining control over its production chain. The brand also noted that due to the geo-economical situation, the factories are not running on full capacity and that makes it less likely that factories will use subcontractors.

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: Jack Wolfskin has identified whether homework is prevalent in its sourcing countries. According to the member there is a very low risk of homeworkers being used by its suppliers because of the nature of its products. The products Jack Wolfskin produces are very technical and require specialised equipment. In the past, one case was identified involving a specific product, knitted headwear. To address this, Jack Wolfskin and the factory implemented a solution where the women who were initially working from home were provided with the opportunity to work within the factory.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Intermediate	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	2	4	0

Comment: Jack Wolfskin uses contracts with its suppliers. The member has agreements in the form of a Manufacturing Agreement that stipulate terms of payment, liability, penalties. Payment terms are generally up to 60 days upon delivery for standard Tier 1 suppliers, although exceptions are occasionally made for smaller suppliers, with terms of 30 or 20 days. Although the contract includes the Code of Labour Practices, the contract itself does not support the implementation of human rights due diligence. The contract stipulates that in case of delivery delays, Jack Wolfskin's previous owner, Callaway Golf Company, has the right to charge the supplier a discount only if the member company can prove a delivery delay is the fault of the supplier will penalties be charged. However, the member company stated that this has never happened. Jack Wolfskin has changed ownership in 2025.

Recommendation: Fair Wear strongly recommends Jack Wolfsk in to include the shared responsibility of CoLP implementation in its contracts including the shared responsibility for the costs.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in its decision-making processes.	Advanced	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	6	6	0

Comment: Jack Wolfskin actively shares relevant CSR information with other departments. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, the requirement to ensure that suppliers uphold human rights and make measurable improvements in performance is included in the job description of sourcing and compliance staff. Sourcing and purchasing staff work with Key Performance Indicators (KPIs) supporting good sourcing and pricing strategies. Examples of these KPIs include tracking supplier adherence to human rights standards, monitoring progress on corrective actions related to harassment and discrimination, and ensuring compliance with onboarding requirements before order placement.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

Comment: Jack Wolfskin implements various measures to ensure production takes place within reasonable hours. The brand's sourcing strategy is centred on long-term planning, with lead times structured over 6, 12, 18, and 24 months intervals. Approximately two years in advance, suppliers are informed about expected product requirements and complexity, enabling them to plan and align their capacity. Seasonal and annual planning is in place, with forecasts shared progressively as the purchase order (PO) date approaches. Capacity booking occurs three months prior to POs, allowing suppliers to adjust production schedules with minimal deviation. The use of a frozen date in the calendar ensures no late design or quantity changes occur.

Jack Wolfskin's forecasting system leverages historical order data, driving its capacity planning process. This structured approach minimises pressure on factories and facilitates alignment between suppliers and the brand. The member requires its business partners to calculate prices in a manner that complies with the Code of Conduct (CoC) and to report capacity in advance, as stipulated in the Manufacturing Agreement. When delays occur due to unforeseen circumstances, such as material shortages, suppliers must provide detailed explanations. Jack Wolfskin collaborates with suppliers to resolve such issues without imposing fixed penalties.

Jack Wolfskin has detailed knowledge of production steps and supplier capacities, enabling it to prevent overbooking of production facilities. Time buffers are consistently built into lead times, and in cases of overbooking, orders are rescheduled or shifted to other facilities. During low seasons, production may begin earlier to optimise supplier capacity and avoid peak-time pressures. For urgent or delayed orders, air freight is occasionally utilised, with costs shared between the brand and suppliers depending on the situation.

Despite these measures, some audit reports from suppliers where Jack Wolfskin has high leverage indicate instances of excessive overtime. To address this, the brand actively monitors working hours and reviews capacity planning with suppliers to mitigate risks and support compliance with ethical labour standards. The structured planning process demonstrates Jack Wolfskin's commitment to maintaining reasonable working hours and fostering responsible supply chain practices. However, the brand has yet to actively involve its suppliers in the forecasting and planning process.

Recommendation: Jack Wolfskin is strongly recommended to actively involve its suppliers in the forecasting and planning process.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Basic	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	2	6	0

Comment: Jack Wolfskin has a good understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Jack Wolfskin's development team knows the number of actual sewing minutes needed for a style. Jack Wolfskin knows the labour minute value at most of its suppliers based on price history and experience as well as some fact-based information. Jack Wolfskin includes changes in legal minimum wage or inflation in its buying prices.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding 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: Jack Wolfskin has informed its eight intermediaries that cover 39% FOB of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support HRDD and the implementation of the CoLP by maintaining transparency about where production is placed and ensuring Jack Wolfskin has full visibility and the ability to monitor all production locations.

Layer 3 Prevention, mitigation and remediation

Possible Points: 96
Earned Points: 54

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: Jack Wolfskin has prioritised risks per production country and created action plans per production country. Risks are prioritised based on the country-level risks. The brand has actions plans for its suppliers per country, rather than per facility. For its supplier in Myanmar the member company follows the risk profile and prioritisation of significant risks as identified by Fair Wear and its stakeholders, as well as the information provided through MADE in Myanmar SMART Factories Programme. The member company could show it actively integrated findings from the the International Accord Bangladesh Safety Program into action plans for its suppliers in Bangladesh and works on joint prevention, mitigation and remediation with signatories of the International Accord. The member brands biggest supplier in Bangladesh is not yet covered by the Ready-Made-Garment Sustainability Council (RSC). While the RSC has already accepted direct factory membership, and audit and the programme have not started on the day of the check. The member brand was able to show it has also offered the factory to conduct a third-party audit on fire, structural and electrical safety by a credible auditor, but the factory suggested to wait for the official RSC audit.

In Myanmar, where Jack Wolfskin sources from two production locations and human rights risks are heightened, Jack Wolfskin submits regular progress reports to Fair Wear. These reports address key focus areas, including: freedom of association, access to remedy, grievance mechanisms, forced labour, economic linkages to the military, security risks, and other salient issues such as excessive overtime and wages. In 2024, Fair Wear required brands sourcing in Myanmar to ensure their suppliers pay workers a minimum of 10.000 kyat per day. The member brand worked on increasing wages and worked with its supplier on raising the wages, with workers receiving a wage that met the target wage of MMK 10,000 per day.

Recommendation: Fair Wear recommends the member to enrol in the learning module 'Unpacking HRDD step 3: 'Cease, prevent or mitigate harm in the enterprise's own operations and in its supply chain'. Fair Wear strongly recommends Jack Wolfskin to become a signatory of the International Accord. Fair Wear recommends Jack Wolfskin to ensure more factories have an action plan that matches their risk profile, and not just the country risk scoping.

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: Jack Wolfskin's risk analysis includes a gender lens for its main suppliers on a basic level, which has informed its improvement or prevention steps. Jack Wolfskin focuses on potential harms related to living wages, discrimination, and sexual harassment as high risks to women, particularly in Bangladesh. In contrast to last year, actions follow from the risk assessment and not just the corrective action plans. As described under 2.9, the member has started an extensive analysis to understand the wage gaps at its suppliers, but has yet to incorporate it in its action plans.

Recommendation: Fair Wear recommends Jack Wolfskin to make the gender lens in its action plans more comprehensive.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: Jack Wolfskin included some steps to encourage Freedom of Association (FoA) and effective social dialogue in its action plans. These steps include establishing quarterly check-ins between its team member in Vietnam and the union at a factory level. This quarterly check-in is a trial that aims to strengthen connections with the union and employee representatives in the local language, enabling a better understanding of their needs and concerns while ensuring they have a direct channel for raising challenges within the factory. To gain acceptance from factory management, Jack Wolfskin first introduced the initiative to management, seeking their approval to build trust and establish a communication channel with the union. The team uses this opportunity to provide ongoing education on the Code of Conduct, the role of unions, and effective interactions with management. While this approach is successful, and the member extended it to key sourcing countries, such as China, Myanmar and Bangladesh, the member still faces challenges in China and Myanmar, due to accessibility of the worker representation to the brand.

Recommendation: Fair Wear recommends Jack Wolfskin to include steps encouraging FoA and effective SD in all action plans. Fair Wear recommends Jack Wolfskin to include more comprehensive steps in its action plans. Jack Wolfskin is strongly encouraged to ensure worker representatives are involved in the steps that the member takes to promote freedom of association and effective social dialogue.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	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: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and monitored systematically every year. Jack Wolfskin evaluates the effectiveness of these mechanisms by reviewing grievance logs and conducting regular audits, which include interviews with workers to assess their awareness and trust in the available systems. Additionally, the member requires factories to ensure that workers are informed of grievance mechanisms during onboarding and through periodic training sessions. Jack Wolfskin actively supports and monitors the effectiveness of factory-level grievance mechanisms by providing supplementary channels for workers to report issues, such as the Sumations Complaints Box (Com Box), which allows workers to reach out in the way they find most comfortable. The member also works to build closer communication channels between its local sustainability teams and factory unions. Jack Wolfskin encourages factories to distribute Fair Wear's Worker Worker Information Cards (WIC) alongside payslips, ensuring workers have access to grievance contact information at home. The member brand combines external training opportunities, accessible communication channels, and regular monitoring.

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: Jack Wolfskin cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Jack Wolfskin also cooperates with customers that are not Fair Wear members. The member company can demonstrate it works on joint prevention, mitigation and remediation 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.	67%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

Comment: During the performance check Jack Wolfskin could demonstrate it has followed up on more than 67% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. Jack Wolfskin could also demonstrate progress on action plans for its suppliers in Bangladesh and could demonstrate (financial) contribution to preventive, mitigative and remediating actions.

As mentioned in previous indicators, Jack Wolfskin enrolled its factory in the MADE in Myanmar SMART Factories Programme. This programme conducts worker surveys and closely monitors the brands supplier in Myanmar through quarterly factory assessments. The factory assessments include overtime and wage monitoring. During the Brand Performance Check, documents and information were provided. In 2024, Fair Wear required brands sourcing in Myanmar to ensure their suppliers pay workers a minimum of 10.000 kyat per day. The member brand worked on increasing wages and worked with its supplier on raising the average wage, with workers receiving a wage that met the target wage of MMK 10,000 per day.

Recommendation: Fair Wear strongly recommends that Jack Wolfskin ensures that all factories have an action plan that matches their risk profile. Fair Wear also recommends the member brand to further improve its action plans.

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: Jack Wolfskin has identified some root causes of the CAP issues and discussed these with its suppliers. The main root causes of all issues are a lack of awareness about the Code of Labour Practices and a lack of social dialogue, especially an insufficient internal grievance mechanism. The member has started developing some preventive steps addressing these root causes, focusing on implementing Fair Wear's onboarding training programmes to raise awareness about the CoLP and social dialogue.

Due to the military takeover and the current situation in Myanmar, Jack Wolfskin is conducting heightened human rights due diligence (HRDD). This includes frequent monitoring activities. Most root causes come back to operating in a conflict zone and a legal minimum wage which is far below the poverty line.

Recommendation: Fair Wear recommends Jack Wolfskin to translate its root cause analysis into concrete preventive actions as part of the risk profiles for all its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no 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: Jack Wolfskin has some suppliers where action plans are not needed. These cover less than 1% of the member's total FOB. The member brand collects audits where possible. Jack Wolfskin regularly reviews changes to the risk situation. The supplier is based in Germany. The member has yet to include worker representatives and local unions in discussions with factory management on possible human rights risks. The member brand is in regular contact with factory management to discuss possible human rights risks at suppliers where member does not conduct improvement or prevention programmes.

Recommendation: Jack Wolfskin is recommended to ensure worker representation and local unions 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 the previous year, seven audit reports of the total 20 audits mention excessive overtime. Jack Wolfskin analysed the root causes of these findings. According to the member, low wages that incentivise workers to seek additional overtime, limited leverage at certain factories, and poor management practices at production sites are significant causes of excessive overtime. But in not all cases the member can influence it as it has too little leverage. The member company discussed these issues with suppliers, raising the topic in price meetings to align wage structures with realistic production schedules and ensure overtime is managed collaboratively. The member also highlighted the importance of robust management systems and frequent site visits to address operational inefficiencies and improve oversight. Despite these measures, some audit reports from suppliers where Jack Wolfskin has high leverage indicate instances of excessive overtime. To address this, the brand actively monitors working hours and reviews capacity planning with suppliers to mitigate risks and support compliance with ethical labour standards

Recommendation: Jack Wolfskin could use the outcomes of the root cause analysis to identify strategies that minimise the impact of its sourcing practices on working hours. The member could develop processes to deal with possible delays to avoid excessive overtime. Those processes include being flexible with delivery dates, prioritising orders, offering support/flexibility for material delivery, ordering in low season, keeping stock etc.

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.	Advanced	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.	4	4	-2

Comment: In the previous year, no audit included findings regarding non-payment of legal minimum wage.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Basic	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	2	6	0

Comment: Jack Wolfskin has a basic overview of the wage levels at its suppliers. The member understands that wages at almost all its production locations in Asia fall below living wage estimates, such as the Asian Floor Wage. Jack Wolfskin has discussed living wages with its suppliers and recognised the need for additional training, particularly for its local teams, to better address and advocate for living wages during supplier engagements. Jack Wolfskin has reviewed its internal practices to identify how these could be altered to address wage gaps. Discussions with suppliers have highlighted challenges such as changes in factory management and a lack of robust systems for managing health, safety, and wages. The member integrates wage considerations into price meetings, acknowledging that overtime and wages cannot be managed effectively without its involvement. While Jack Wolfskin has taken initial steps to understand and address wage gaps, it has yet to implement comprehensive measures, such as systematic training for local teams or tools like wage ladders, to close these gaps sustainably. The member has yet to include worker representation in the conversations with its suppliers.

Recommendation: Fair Wear encourages Jack Wolfskin 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.	Insufficient	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	0	6	0

Comment: Jack Wolfskin does not have a strategy on how to finance wage increases at its suppliers. However, the brand has started to collect data but has yet to turn it into an operational strategy.

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

Recommendation: It is advised that the strategy for how to finance wage increases is agreed upon by top management.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	0%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	0	6	0

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

Recommendation: Fair Wear recommends Jack Wolfksin to enrol its living wage strategy to its suppliers and to pay its share of the living wage estimate.

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: Jack Wolfskin received nine complaints in the past financial year related to ensuring a living wage, legally binding employment relationships, and safe and healthy working conditions, as well as issues regarding freedom of choice in employment, non-discrimination, and maintaining reasonable working hours at its suppliers in Myanmar, Bangladesh, China and Vietnam. The member actively responded to these complaints as per Fair Wear's Complaints Procedure. Additionally, the member regularly reviewed the status of complaints and actively engaged with Fair Wear to address delays in resolution or closure. Jack Wolfskin's internal team closely monitors and manages complaint handling to ensure timely follow-up and remediation in line with the established procedure. Finally, while the member tries to include worker representation as much as possible in the remediation, it finds it difficult to engage with them in a timely manner. Jack Wolfskin included the outcome of these complaints to decide on further preventive actions in its supply chain.

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: Jack Wolfskin has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on gender based discrimination and violence as well as limited knowledge about social dialogue in the Fair Wear onboarding and Gender Based Discrimination and Violence and Harassment training.

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: Jack Wolfskin followed up on the implemented training by regularly engaging with its suppliers. Although no follow-up was required for the onboarding module, Jack Wolfskin took proactive measures to enhance operations. During factory visits, the brand's staff reviewed and documented improvements made by the factory in response to worker feedback obtained during the training sessions. As a part of the training follow-up, the supplier conducted comprehensive surveys among the workforce to assess issues such as working hours, pay, facilities, and recruitment policies. These surveys are now carried out periodically by the supplier to monitor progress and pinpoint new concerns. Additionally, Jack Wolfskin used the training outcomes to inform its ongoing risk assessments.

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: Jack Wolfskin's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member stopped with almost 20 suppliers in China, Türkiye, Vietnam, Cambodia, Myanmar, and Bangladesh. The member followed the steps in the responsible exit strategy where required. The brand mentioned that in some cases, the leverage was too insignificant to fully apply the responsible exit policy. Jack Wolfskin did not discuss the responsible exit strategy with all its suppliers.

Recommendation: Jack Wolfskin could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Basic	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	2	6	0

Comment: Jack Wolfskin undertakes human rights activities that go beyond Fair Wear's scope. The member company collects third-party social audit reports and, in some cases, commissions them based on the risk assessment for Tier 2 suppliers. Jack Wolfskin also uses Social & Labor Convergence Program (SLCP) data on working conditions for Tier 2 and occasionally for Tier 3 suppliers and works on the remediation of open actions when required. The company performs CAP follow-up for these audits but has yet to include preventive measures.

Recommendation: Fair Wear encourages members to go beyond Fair Wear policy or scope requirements.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22
Earned Points: 12

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	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: Jack Wolfskin communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. By using social media channels, newsletters, on-garment communication, and press releases, Jack Wolfskin actively spreads the Fair Wear message.

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: Jack Wolfskin 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.	Insufficient	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.	0	4	0

Comment: Jack Wolfskin has not submitted its social report. The member brand has provided insufficient information in its social report on how it conducts human rights due diligence in Myanmar

Requirement: Jack Wolfskin needs to report on its human rights due diligence and submit that report to Fair Wear.

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: Jack Wolfskin publishes its production locations on its website, which includes factory-level data and remediation results. The factory-level data the member included main audit findings, complaint details, training outcomes, and risk analysis results.

Recommendation: Jack Wolfskin is recommended to include more factory-level data in its reporting and ensure suppliers consent with data sharing.

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

Comment: Jack Wolfskin has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. In its evaluation system, the member includes triangulated information from external sources, such as suppliers, employees and other relevant external stakeholders through conducting a materiality assessment as well as top management.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	0	4	-2

Comment: The previous performance check, over the financial year of 2023, included requirements on actions in regard to the International Accord in Bangladesh, heightened due diligence in Myanmar and living wages in general. While the member has followed up on the actions in Bangladesh and Myanmar, it still has to work more structurally on improving wages at its production facilities.

Recommendation: Jack Wolfskin 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.: Not applicable

Recommendations to Fair Wear

Jack Wolfskin noted that access to data sources such as the WageIndicator could be offered to Fair Wear brands at a reduced rate, as approximately 10–15 brands have expressed interest. It also suggested that member companies could benefit from more structured access to Fair Wear's Board members, for example through periodic dialogues or open consultation moments. Finally, the member company recommended that the country risk-scoping approach be standardised across all brands by using consistent severity and likelihood scores per country, rather than applying separate assessments for individual brands. assessments. The brand mentioned that they do not agree with Fair Wear's policy on not sharing the training outcomes with suppliers.

Brand Performance Check details

Date of Brand Performance Check: **15-10-2025**
Conducted by: **Jason Mandels**
Interviews with: Melanie Kuntnawitz - Director Sustainability & Social Compliance
Aslam Hossain - Sustainability Manager
Imen Wong - Vice President Global Product Development
Caroline Zimmermann - Director Supply Chain Planning & Purchasing