

Brand Performance Check SALEWA, DYNAFIT, Wild Country & LaMunt

Publication date: August 2021

This report covers the evaluation period 01-01-2020 to 31-12-2020

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 <u>www.fairwear.org</u>. The online <u>Brand Performance Check Guide</u> provides more information about the indicators.

On COVID-19

This years' report covers the response of our members and the impact on their supply chain due to the Covid-19 pandemic which started in 2020. The outbreak of the Covid-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

Brand Performance Check Overview

SALEWA, DYNAFIT, Wild Country & LaMunt Evaluation Period: 01-01-2020 to 31-12-2020

Member company information	
Headquarters:	Bolzano , Italy
Member since:	2013-09-01
Product types:	Outdoor products, Outdoorwear
Production in countries where Fair Wear is active:	Bangladesh, Cambodia, China, India, Myanmar, Romania, Tunisia, Viet Nam
Production in other countries:	Albania, Austria, Belarus, Czechia, Germany, Italy, Lithuania, Republic of Moldova, Slovakia, Slovenia, Switzerland, Taiwan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	93%
Benchmarking score	82
Category	Leader

4/43

Summary:

SALEWA, DYNAFIT, Wild Country & LaMunt has shown advanced progress and met most of Fair Wear's performance requirements. Its monitoring threshold of 93%, combined with a benchmark score of 82, means that Fair Wear has again awarded the member the 'Leader' rating.

Corona Addendum:

As the Oberalp Group that owns SALEWA, DYNAFIT, Wild Country & LaMunt is headquartered in North Italy, the member was one the first outdoor companies to be hit by the pandemic. From March till the summer of 2020, staff worked on reduced hours from home. While the sales reduced drastically initially, sales had stabilized by the end of the year thanks to well-developed e-commerce channels and outdoor gear being in higher demand during lockdown.

From the beginning of the pandemic, the member sent a clear message to its suppliers that no orders would be cancelled, and payments would not be postponed. As such, SALEWA, DYNAFIT, Wild Country & LaMunt guaranteed its suppliers business continuity. In turn, it requested suppliers to provide wage stability to its workers.

SALEWA, DYNAFIT, Wild Country & LaMunt immediately sent very detailed questionnaires to its suppliers to identify potential risky situations and difficulties that suppliers were facing. The member also checked that suppliers were taking the necessary measures to limit the virus's spread virus and comply with local laws regarding wages and payments. The surveys were sent twice, and SALEWA, DYNAFIT, Wild Country & LaMunt continued the conversation, especially if a factory's response required closer monitoring.

In its contact with suppliers, the company stressed the importance of involving unions and worker representatives in negotiations about dealing with the impact of COVID-19 on workers. The member also reminded its suppliers about the need to communicate the decisions to all workers.

The local quality controllers (QCs) based in Bangladesh, China, Myanmar and Vietnam proved to be a good source of information about the local situation and the current capacity of all suppliers. While the member still succeeded in enrolling four suppliers in Fair Wear audits, the member also used video calls for continuous monitoring.

The member checked the grievance mechanisms of its suppliers for possible COVID-19 related issues and complaints. Furthermore, the company asked its suppliers how it could support them, and upon request sent face masks to an Indian supplier to provide to its workers.

SALEWA, DYNAFIT, Wild Country & LaMunt identified the weak implementation of health and safety measures in its Bangladeshi suppliers as one of the biggest risks and ensured improvements were made. Where suppliers were closed temporarily the member asked if workers continued to receive their wages, but the follow up was not always quick enough. In some cases verification via documents checks is advised. The member did not cancel, reduce or postpone any orders that were accepted or in process. The company asked its suppliers to be informed if they experienced financial difficulties, and for three suppliers it made advance payments. To come up with more accurate forecasting, the company delayed its forecasting with one month. To create more continuity for both suppliers and retailers, the company adapted its collection to create more carry-over styles.

All in all, the member has shown that with strong systems in place, it could respond responsibly to the pandemic and be a reliable partner for its suppliers.

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.

1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	57%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

Comment: At 57% of its suppliers, SALEWA, DYNAFIT, Wild Country & LaMunt buys at least 10% of production capacity. This is an increase by 24% of the total brand FOB in comparison to the previous financial year. Supply chain consolidation is central to the sourcing strategy of SALEWA, DYNAFIT, Wild Country & LaMunt. However, the member needs specialized suppliers for its technical accessories. The company tried to consolidate more by investing in skill building at current suppliers for making these accessories, but this proved too complicated.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	26%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

Comment: 26% of the production volume from production locations comes from sites where SALEWA, DYNAFIT, Wild Country & LaMunt buys less than 2% of its total FOB.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT, Wild Country & LaMunt to continue consolidating its supply base by limiting the number of production locations in its 'tail end'. To achieve this, SALEWA, DYNAFIT, Wild Country & LaMunt should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance.

Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	75%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: In 2020, 75% of its total FOB volume came from factories SALEWA, DYNAFIT, Wild Country & LaMunt has been working with for more than five years. For SALEWA, DYNAFIT, Wild Country & LaMunt, one of its primary objectives in regard to supply chain management, is to establish long-lasting relationships with suppliers, with the aim of maximum mutual benefits.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: In 2020, SALEWA, DYNAFIT, Wild Country & LaMunt started working with two new factories. The member could show it received signed questionnaires from these suppliers. Collecting and approving the questionnaire is part of SALEWA, DYNAFIT, Wild Country & LaMunt's due diligence process before starting production with any new location.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has a written, systematically organized due diligence process that is followed when starting at new production locations. It outlines required steps for various departments including sourcing, production, and CSR. The sourcing director makes the final decision on adding a new supplier when necessary, the selection is made alongside close support of the sustainability team. Before a new supplier is selected, relevant country-specific highrisk issues are checked. A thorough factory self-assessment is conducted as well as an assessment by the quality control staff. During the visit, any existing audits are collected and a corrective action plan is created before production begins. For it's costing methodology, SALEWA, DYNAFIT, Wild Country & LaMunt requires suppliers to provide transparent costing sheets and this is communicated from the beginning.

The same steps were taken when a Lithuanian supplier opened a production location in Belarus. The Quality Control Specialist visited the location, used the health and safety checklist provided by Fair Wear and checked that the Worker Information sheet was posted. The member had a call with the Fair Wear Macedonian team to discuss labour risks specific to former USSR countries. SALEWA, DYNAFIT, Wild Country & LaMunt organized a third party audit for the facility, but due to political turmoil this had to be postponed to 2021.

The due diligence steps needed per country are also informed by the outcome of the supplier evaluation system (see 1.5). The results of this evaluation are grouped per country, giving a clear overview what labour rights are at risk in the different sourcing countries. When the Oberalp Group started with new brand LaMunt in 2020, this evaluation informed the selection for its suppliers. LaMunt has been added to FW membership and follows the same thorough due diligence process.

COVID-19:

At the start of the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt sent very detailed questionnaires to its suppliers to identify potential risky situations and difficulties that suppliers were facing. The surveys were sent twice and continued the conversation, all the more if a response of a factory required closer monitoring. The member asked specifically about production capacity, whether other buyers reduced their orders, working hours, number of workers, and suppliers' ability to ensure the payment of wages. The member also asked its suppliers how it could support them, and upon request sent masks to an Indian supplier to provide to its workers.

The Sourcing Department has been constantly in contact with the suppliers and stayed informed on the changes, the spread of the virus and its consequences in all sourcing countries. The local quality controllers (QC) based in Bangladesh, China, Myanmar and Vietnam proved to be a good source of information about the local situation and the current capacity of all suppliers. While the member still succeeded in enrolling four suppliers in Fair Wear audits, the member also made use of video calls for continuous monitoring.

The member also checked that suppliers were taking the necessary measures to limit the spread of the virus and complied with local laws regarding wages and payments.

In general, the main dilemma that the member faced was between knowing many buyers cancelled orders and the impact of this on the financial stability of its suppliers, and on the other hand suppliers responding to detailed questions that they were still financially stabile. The member did not verify the answers of its suppliers with requesting wage slips for instance, but instead checked the grievance mechanisms for possible complaints. In its due diligence efforts, SALEWA, DYNAFIT, Wild Country & LaMunt continuously considered where to ask for more detailed information and where to trust responses and not create extra work for suppliers, to enable them to work on continuing operations.

One of the highest risks SALEWA, DYNAFIT, Wild Country & LaMunt identified was inadequate health and safety measures at its Bangladeshi suppliers. Clean Clothes Campaign reported that factories in Bangladesh struggled to pay Eid al-Fitr and Eid al-Adha bonuses, and therefore the member specifically asked its suppliers about that. The second set of questions that the member asked its Bangladeshi suppliers was related to the revision of contractual conditions and the increase in cost of living. Suppliers stated that their contracts complied with legal requirements and that living costs were not increasing. SALEWA, DYNAFIT, Wild Country & LaMunt is aware that calculating these costs is not that easy and even if they did not increase during the first lockdown, they could go up afterwards. The company further checked on the existence of functioning unions, their involvement in the implementation of COVID-19 related measures, and on the potential increase in workers complaints.

Recommendation: For countries where Fair Wear is not active, SALEWA, DYNAFIT, Wild Country & LaMunt can use the CSR Risk Check (https://www.mvorisicochecker.nl/en/risk-check) to further assess the risks in (potential new) sourcing countries such as Belarus.

Even though the company culture is such that purchasing automatically checks in with CSR when considering new sourcing countries/ locations, Fair Wear recommends the member to discuss whether CSR could have explicit veto power when it comes to new countries and locations. In this way this step is not dependent on a working culture that may change over time.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	ο

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has a system in place to evaluate suppliers' social compliance status based on audit findings from different audits and progress towards follow up by each supplier. The performances of suppliers are compared to one another, and tracked over the years on three levels of abstraction:

1. Specific audit findings

2. All findings related to one labour standard combined: such as the aggregated results on overtime and living wage

3. The overall supplier performance related to all labour standards and its responsiveness, willingness and proactiveness to prevent and mitigate.

SALEWA, DYNAFIT, Wild Country & LaMunt incorporates supplier performance related to CoLP compliance in regular department meetings because it has strong links to consistent orders and continuity of quality. Therefore, the outcomes of supplier evaluations influence the production decision process. Previously, the member shared the results with its suppliers. However, local QCs warned the company that this may lead suppliers to try to paint a too rosy picture, and therefore SALEWA, DYNAFIT, Wild Country & LaMunt stopped sharing results.

Between 2019 and 2020, SALEWA, DYNAFIT, Wild Country & LaMunt stopped sourcing at 11 factories. In one case, it was the supplier's decision to allocate production orders elsewhere. For the other factories, the main reasons were consolidation of production locations, suppliers' difficulties to meet requirements and in one case use of too many subcontractors. The member flags this well in advance with the factory; before forecasting and usually at least one and half year in advance. CSR monitors that sourcing follows the responsible exit strategy provided by Fair Wear.

During the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt was in constant dialogue with its suppliers about its orders. The member did not cancel, reduce or postpone any orders that were accepted or in process. To be able to come up with a more accurate forecasting, the company delayed its forecasting with one month.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: In its production planning, SALEWA, DYNAFIT, Wild Country & LaMunt calculates back; factories are asked when material needs to be in to have the order ready at a certain time. The member then asks the material suppliers when they need to receive the final forecasts to be able to deliver the material at that time. By cooperating this closely with material suppliers, the member hopes to prevent material delay, which is one of the main root causes of excessive overtime.

Each delivery date is calculated taking into into account the factory's capacity, which is then updated on a monthly basis. In case of a production delay, the brand is flexible with delivery dates or agrees on shipment via air. SALEWA, DYNAFIT, Wild Country & LaMunt does not place urgent orders that can put its suppliers under unnecessary stress. It confirms samples in a timely manner, enabling a smooth and efficient product development. After each season the member evaluates its orders, looking at how close the actual delivery of each stage was to the plan.

Because of the pandemic SALEWA, DYNAFIT, Wild Country & LaMunt focused on providing stability of orders, also by creating more carry-over styles. In response to factory closures, delayed material and reduced capacity, the member accepted all production delays.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

Comment: In three audits of 2020 the Fair Wear teams found non-compliances regarding working hours; either excessive overtime or working during holiday. When excessive overtime is found, the member first asks whether the brand has contributed to the excessive working hours, and then tries to identify the root cause. All suppliers informed the audit team the sourcing practices of the member did not lead to the overtime hours and the lead times given by SALEWA, DYNAFIT, Wild Country & LaMunt are more than sufficient.

The member has developed a detailed questionnaire, based on the Better Buying questionnaire, that allows suppliers to identify which steps in the development and production process are delayed and which client contributes to this delay. The member encourages its suppliers to use this questionnaire with its other clients to have a discussion about their impact on the working hours.

Even though the excessive overtime found in the 2020 audits is not caused by the orders of SALEWA, DYNAFIT, Wild Country & LaMunt, the member can alleviate the pressure on suppliers during peak season. Therefore the member is discussing internally to have more carry-over styles that suppliers can produce throughout the year when there is more availability.

After suppliers reopened after lockdown, SALEWA, DYNAFIT, Wild Country & LaMunt was in constant dialogue with suppliers about the available production capacity and delays, and did not oblige them to keep to lead times that proved unrealistic. All delays were accepted and since many shops were closed in Europe at that time and all summer products were already delivered, the company did not consider this a big problem.

Recommendation: Fair Wear recommends the member to continue exploring possibilities to extend the carry over styles, which helps suppliers to smoothen out production throughout the year.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in 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.	4	4	Ο

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt works with an extensive cost breakdown calculation per style, including estimated cost composition and workmanship costs. The supplier provides the labour costs. The costing manager cross-checks the approximate labour costs (per style) with the complexity of the garments and the standard allowed minutes, the technical experience of the factory and other specific features.

In 2020 the member updated the tool to now also include the efficiency percentages of the different production countries in its calculation. The company checks with its suppliers whether these percentages are reasonable. As the tool includes the most recent living wage benchmarks, which are then calculated into living wage per minute, it allows SALEWA, DYNAFIT, Wild Country & LaMunt to check whether its pricing covers its share of the living wage.

SALEWA, DYNAFIT, Wild Country & LaMunt has not increased its prices to cover for costs related to COVID-19, such as the implementation of health and safety measures. However, with the costing system that the member has in place, it assumes that suppliers will increase the labour or other costs if the COVID-19 related costs are substantial.

Recommendation: The member is recommended to ask suppliers to include costs incurred due to COVID-19 measures (reduced capacity/efficiency of the supplier, acquisition of face masks/thermometers/hand sanitizers etc.) in the labour minute values and as such make sure these costs are covered by the brand's prices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

Comment: A 2020 audit at a Bangladeshi supplier shared with another FW member in November, found that workers were paid on apprenticeship wage. Even while this follows local legislation, it is considered an urgent finding since this wage is below the legal minimum wage. This matter was taken up urgently but is still outstanding as it is more difficult to convince a supplier about the need for remediation when it follows local legislation.

Another July 2020 audit at a Chinese supplier showed that during factory closure in February, workers were not paid for eight working days. SALEWA, DYNAFIT, Wild Country & LaMunt has asked the supplier to pay the workers their due wages, but has yet to ask for verification.

Through the COVID-19 questionnaire, one Vietnamese supplier informed the member about dismissals. SALEWA, DYNAFIT, Wild Country & LaMunt immediately followed up to ask if outstanding wages, severance, and benefits were paid. The supplier responded that the dismissals pertained to another larger production location that produces for American clients. With help of other supplier information the member could indeed show that this indeed did not affect its production location.

Requirement: If a supplier fails to pay wages, members are expected to respond in time and collect evidence of remediation. Additional verification by Fair Wear may be needed to check remediation.

Recommendation: Members are recommended to investigate the wage levels at factories to ensure that at least the legal minimum wage i.e. no payment at apprentice ship level, or probation period level, is paid to workers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	Ο	Ο	-1

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt pays suppliers once orders leave the harbour. During the pandemic it was very clear for the member that no payments would be postponed. The company asked its suppliers to be informed if they are experiencing financial difficulties, and for three suppliers it made advance payments without any conditions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are 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	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt continues to systematically assess wage levels in its production locations. The brand collected data on the wages paid by their suppliers in order to have an overall picture and calculated the total salaries in regular, benefit and overtime incomes for lower-paid, mode and higher-paid workers. The overview of the wages paid to workers was compared with several living wage benchmarks, the minimum wage, the trade union demand, and the local stakeholder demand.

Through a previous in-depth analysis for China, Vietnam, Bangladesh, Romania, Cambodia, Moldova, and Turkey, the member concluded that a vast majority of the production locations paid above the legal limit but below living wage benchmarks. The company is aware of wage levels in its supply chain received through FW audits. The member planned to organize worker surveys about costs of living but decided to postpone this in response to the pandemic.

Through the COVID-19 questionnaire several suppliers informed the brand that it reduced wages temporarily to deal with reduced orders of other clients.

Recommendation: Where COVID-19 has led its suppliers to (temporarily) reduce the wages, SALEWA, DYNAFIT, Wild Country & LaMunt could investigate how much the gap between paid wages and living wage increased. The member could also discuss possible solutions with its suppliers, using the ETI/FW Brand/supplier conversation framework, and ensure the reduction of wages will be annulled when the situation normalizes.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	6	6	0



Comment: In the previous years, the member tried to calculate appropriate target wages, but found that this was a very difficult process. Therefore, the company has decided to set the target wage 20% above the legal minimum wage, as a compromise between precision and ease of calculation.

The goal is to pay the target wage to each worker, across all suppliers.

SALEWA, DYNAFIT, Wild Country & LaMunt is aware that in many production countries an additional 20% on top of the legal minimum wage does not approach a living wage benchmark. It is considered as a first feasible step and starting point for discussions with suppliers.

Recommendation: Fair Wear recommends the member to continue revising the target wages per country, to further close the gap between the paid wages and the living wage benchmarks.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	78%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	6	6	0

Comment: The extensive living wage analysis of SALEWA, DYNAFIT, Wild Country & LaMunt shows that the brand has achieved its target wage (legal minimum wage + 20%) at 78% of it total production volume in high risk countries for the mode workers.

Recommendation: The member is encouraged to work to also getting the lowest paid workers to earn the target wage . This target wage is a first step and the member is recommended to continue increasing wages.

Purchasing Practices

Possible Points: 52

Earned Points: 40

2. Monitoring and Remediation

Basic measurements	Result	Comments	
% of production volume where an audit took place.	76%		
% of production volume where monitoring requirements for low-risk countries are fulfilled.	17%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)	
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.	
Requirement(s) for next performance check	One Bangladeshi tail end supplier has not been audited. The member needs to follow strict monitoring for tail end locations in Bangladesh, Myanmar and locations where th has been a complaint.		
Total monitoring threshold:	93%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: The CSR team is responsible to follow up on problems identified by monitoring systems.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	Ο	-1

21/43

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt shares audit reports and CAPs with factory management, and worker representation where applicable, in a timely manner, either in person or via email. Timelines are discussed and jointly agreed upon.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has continued its efforts to address CAPs and the progress made at its suppliers. This effort is evaluated and included in the supplier evaluation, see 1.5. In general, the CSR team prepares and debriefs the management or staff member visiting suppliers on the key issues to address/check.

The CSR team collects CAPs updates twice a year in May/October. The quality of the responses by the suppliers on the outstanding issues is assessed, and feedback is provided to the suppliers. Where possible, the brand involves worker representation in remediation.

FAIR R 22/43 SALEWA, DYNAFIT, Wild Country & LaMunt has updated CAPs available for all of its suppliers, including the evidence and tracking of improvements made, which issues remain outstanding and comments by suppliers and the brand's staff. In a sample of CAPs, provided for the performance check, SALEWA, DYNAFIT, Wild Country & LaMunt showed progress on the CAP for different issues (health & safety, working hours and legally binding conditions). However for one audit done at a Chinese supplier the member could not show follow up and believes that its emails were not received by the supplier due to server problems.

To tackle some root causes of CAP findings at one Bangladeshi supplier, the member is exploring trainings that focus on intercultural communication. At a large Vietnamese supplier, the member has worked together with the Fair Wear team to integrate content of the Workplace Education Programmes into the internal trainings. The CAPs are followed up by the CSR team with the support of the local QCs for checking on evidence and remediation. Where possible, the brand works together on CAPs with another FW member.

During the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt followed up on COVID-19 related issues through emails and videocalls, asking detailed questions from health measures to wages. The questionnaire was used an overview for status and follow up.

Recommendation: The member is advised to build in warning signals when suppliers have not responded to inquiries about CAP status to enable speedier remediation. Fair Wear also recommends the company to continue its preventative work, based on the evaluation system that shows which labour rights are most at risk in its sourcing countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

Comment: In 2020, despite the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt was able to visit production locations that together make up for 49% of the total FOB. As travel was restricted due to the Covid-19 pandemic, this indicator is not applicable in 2020 for all Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

Comment: In 2020, SALEWA, DYNAFIT, Wild Country & LaMunt collected 11 reports. Quality was assessed by looking at wage information and working hours information, health and safety findings. If a report does not have a CAP, the member will create one to ease follow up. The member could demonstrate some sample findings that were followed up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Advanced			6	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

Comment: Bangladesh:

SALEWA, DYNAFIT & Wild Country falls under category two of the Fair Wear enhanced monitoring policy Bangladesh; although it did not sign the Accord agreement, all factories are covered under Accord monitoring. The member has a written sourcing policy and requires that all factories it sources from are members of the Bangladesh Accord on Fire & Building Safety and need to show serious commitment to guaranteeing workers safety in the factory by agreeing to the member's 'Bangladesh sourcing policy'. It informed the suppliers that even in case of the Accord on Fire and Building Safety no longer being active, factories must keep working on the CAP findings and the member is monitoring this. The brand is well informed about high risks, and three of the four suppliers have been audited. The fourth supplier added in 2019 did not have an external audit report but all relevant senior staff have visited the factory and checked a thorough internal audit questionnaire.

Myanmar

In 2020, there were two active factories in Myanmar.SALEWA, DYNAFIT, Wild Country & LaMunt conforms with FW enhanced monitoring requirements, stays up to date with new developments and risks by working closely with FW and taking on additional research. Since 2020 the member has a local QC based in Myanmar which strengthens the company's monitoring.

Other risks: COVID-19

At the start of the pandemic the member took immediate action, sending out a very detailed questionnaire to its suppliers to identify the most urgent issues. The company informed its suppliers no orders would be cancelled and payments would be paid as usual, and asked them to guarantee wage stability for its workers. Where the responses of suppliers gave cause for concern, the member asked its suppliers in great detail about the payment of wages, though it has not verified assurances by asking for wage slips or other documentation. The member company followed closely the documentation provided by Fair Wear and used updates from Clean Clothes Campaign as well in its dialogue with suppliers. For its Bangladeshi suppliers the company identified inadequate health and safety measures as a special risk. Therefore, in addition to monitoring improvements, SALEWA, DYNAFIT, Wild Country & LaMunt shared a video showing exemplary measures being taken by one of its Chinese suppliers.

In its contact with suppliers, the company stressed the importance of involving unions and worker representatives in negotiations about how to deal with the impact of COVID-19 on workers. The member also reminded its suppliers about the need to communicate the decisions to all workers, for instance via the news bulletin.

Other country specific risks:

Most of the members production volume is sourced in Vietnam. In 2020 the labour legislation was updated and SALEWA, DYNAFIT, Wild Country & LaMunt invited its suppliers to the FWF webinars about the amended Vietnam Labour Code. Over 2018 and 2019, five Vietnamese suppliers have been enrolled in the Workplace Education Programme. To improve worker/ management dialogue, in 2019 one supplier was enrolled into the WEP Communication module and another supplier participated in the Better Work Workplace Cooperation training module.

In China the member focuses on improving the grievance mechanisms of factories, and suggests different instruments to ensure workers' voices are heard, via CAP follow-up. The member does not have CMT suppliers located in Uyghur areas, and has checked the same for tier 2 and tier 3 suppliers.

The member is sourcing at three suppliers in India and is well aware of the risks of gender based violence, child labour and Sumangali, which is included in the screening that QCs are doing before onboarding factories.

SALEWA, DYNAFIT, Wild Country & LaMunt has one supplier in Taiwan that falls within the scope of FW membership. The member is well aware that the recruitment and use of migrant workers are common practice in Taiwan, which results in a higher risk of bonded labour. Therefore, together with five other brands, the member founded the Audit Alliance Hard Goods (AAHG) aimed at improving human rights in tier one hardware factories.

Recommendation: To address gender based violence in India, the member could consider enrolling its suppliers in a WEP Violence and Harassment Prevention. Fair Wear recommends the member to enrol its Chinese suppliers in the ILO Score module Workplace Cooperation.

The company is advised to promote processes to ensure Freedom of Association and enhance social dialogue at suppliers. In this regard, the brand could enrol more of its Vietnamese suppliers and its supplier in Myanmar in Fair Wear's WEP Communication module that aims to strengthen social dialogue at participating factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: The member actively cooperates in follow up of a CAP at a shared Bangladeshi supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

Member undertakes additional activities to monitor suppliers.: Yes (1)

Comment: The member visits the low risk countries regularly and during the visit an internal check is conducted that includes 150 detailed questions related to CoLP compliance, and the suppliers' capacity is checked.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

Comment: The company has audited three tail end locations in the last three years for which the lighter requirements are applicable. However, one Bangladeshi tail end location is not audited as per the stricter tail end requirements for Bangladesh.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	Ο

28/43

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	Yes, and member has information of production locations	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	1	1	ο

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has one licensee in China and one in South Korea. The brand has sent and received the questionnaire and both licensees have provided information on the production locations that they use. SALEWA, DYNAFIT, Wild Country & LaMunt's license contract includes minimum requirements on Social Compliancy. Licensees need to adhere to he member's Code of Conduct and commit to its implementation in the factories where they make their products.

Monitoring and Remediation

Possible Points: 27 Earned Points: 24

Brand Performance Check - SALEWA, DYNAFIT, Wild Country & LaMunt - 01-01-2020 to 31-12-2020



3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	2	
Number of worker complaints resolved since last check.	1	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: The CSR team is responsible for addressing worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has a system in place to check the Fair Wear Worker Information Sheet (WIS) has been visibly posted at all production locations and could show proof for a sample of locations.

30/43

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	37%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker- management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Over 2018 and 2019, seven suppliers have been enrolled in the Workplace Education Programme; two in China and five in Vietnam. Due to the pandemic the member cancelled all 2020 WEP plans to avoid risking contamination by placing groups of workers together.

When suppliers opened their gate and started working again, SALEWA, DYNAFIT, Wild Country & LaMunt shared the updated version of the Worker Information Sheet and requested its suppliers to post it in a visible place.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes + Preventive steps taken	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	6	6	-2

Comment: The member followed up a complaint from a Bangladeshi worker, related to discrimination and legally binding employment relations. During the investigation, it was found that the communication of the HR officer to the complainant was not appropriate.

Factory management reprimanded the HR officer and informed this communication is not acceptable. Additionally, training sessions were organised for the HR, admin, compliance and welfare teams about how to respond to complaints. Because the complainant was unaware of the laws regarding maternity leave, factory management also started informing its workers and mid-level management about maternity benefits. SALEWA, DYNAFIT, Wild Country & LaMunt plans to enrol the supplier for a training on intercultural communication once the pandemic is over.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

Complaints Handling

Possible Points: 15

Earned Points: 13



4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt organizes a Retail Academy - a biannual session with retail staff to educate them about products, the company mission and values, and sustainability activities. This has been conducted online in 2020. The new CSO Executive Assistant was given full training on the topic of social compliance, and the Communication Manager was provided with a specific focus on the FWF communication policy and guidelines.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to	Fair Wear Seminars or equivalent trainings	2	2	-1
		implement Fair Wear requirements and advocate for change within their organisations.	provided; presentations, curricula, etc.			

Comment: All staff in direct contact with suppliers, including sourcing and production managers and quality control specialists are informed of FWF requirements and are in regular communication with the CSR team. CSR organised one meeting specifically about COVID-19.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

33/43

Comment: The member has agents in Bangladesh and India. It is the agent's responsibility to ensure compliance to the social standards and follow up on CAPs and complaints. Therefore the member has established a structured due diligence procedure that the agents have to follow. The agents also attend webinars provided by Fair Wear. During COVID-19, the agents were very quick to react on questions from SALEWA, DYNAFIT, Wild Country & LaMunt regarding the impact on the workfloor.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	4%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	1	6	0

Comment: In 2019 the member enrolled one Vietnamese supplier into the WEP Communication module. Another

Vietnamese supplier was enrolled in the Better Work Workplace Cooperation training module.

Due to the pandemic, SALEWA, DYNAFIT, Wild Country & LaMunt decided to cancel all planned trainings in 2020 to avoid having to place groups of workers together.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	Active follow- up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	2	2	0

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt discusses outcomes of the training with the supplier and what steps management is planning to take to further strengthen dialogue between workers and management.

Training and Capacity Building

Possible Points: 13

Earned Points: 8

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt checks all production locations prior to production, and during production staff often visits the sites to collect information on production locations and monitor production per style and per production step. The member keeps a well-documented and up-to-date supplier register which includes detailed information on all production locations, including addresses, subcontractors, number of employees and current CAP status. The CoC that is part of the contract states that subcontracting is only allowed with prior approval from company and that suppliers should continuously monitor their subcontractors.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Information Management

Possible Points: 7

Earned Points: 7

6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt complies with the FW Communications Policy. The FW membership is communicated on hangtags, bags, in-store on plaques and displays, in consumer brochures and online communications.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	2	2	Ο

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt's website links to their latest FW Brand Performance Check report. SALEWA, DYNAFIT, Wild Country & LaMunt publishes the names of their suppliers per product on an interactive website and gives more information when asked.

The member has disclosed o% of production locations to other members in Fair Force and on the Fair Wear website.

Requirement: Fair Wear requires member brands to disclose production locations to other member brands in Fair Force and on the Fair Wear website.

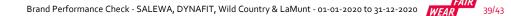
Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: SALEWA, DYNAFIT, Wild Country & LaMunt has submitted its social report to FW in time and has published the report on its website. Furthermore, the sustainability and social report with information about FW membership is published on the website.

Transparency

Possible Points: 6

Earned Points: 6



7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: The Sustainability Manager is part of the management team, therefore the CSR team is closely linked to top management. This includes bimonthly updates on sustainability topics including Fair Wear membership. Membership is frequently evaluated, all the more in light of new policies such as the transparency policy and planned changes to the performance check system.

After the performance check, CSR and top management meet to discuss how to follow up the results.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	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 company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Evaluation

Possible Points: 2

Earned Points: 2



Recommendations to Fair Wear

Fair Wear is recommended to regularly send out a list of new wage data (LMW and living wage benchmarks) for ease of reference. The member urges Fair Wear to include COVID-19 related information in audit reports during 2020 and 2021. To complement external audit reports that do not provide sufficient information, it would be helpful if members could hire Fair Wear local teams for a monitoring visit.

In times of pandemic SALEWA, DYNAFIT, Wild Country & LaMunt thinks it is too much to ask from suppliers to be enrolled in training programmes and finds it too risky to put workers in a room together, while there are other instruments to create worker awareness.

SALEWA, DYNAFIT, Wild Country & LaMunt also recommends Fair Wear to revise its transparency policy, and not make it a condition for leader status. Furthermore, the member recommends Fair Wear to update the low risk policy and especially the list of included countries. Communication can be speedier; invitations to participate in campaigns, or to invite suppliers to webinars often come in quite late which limits participation.

The member hopes that FW and the NGOs represented in its board can have a more synchronized voice and FW can start to filter requests from organisations such as SOMO and CCC. SALEWA, DYNAFIT, Wild Country & LaMunt expects that the results of the performance check can be used by NGOs so members don't need to invest significant time in responding to questions that are already answered in the performance check report.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	40	52
Monitoring and Remediation	24	27
Complaints Handling	13	15
Training and Capacity Building	8	13
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	100	122

Benchmarking Score (earned points divided by possible points)

82

Performance Benchmarking Category

Leader

42/43

Brand Performance Check details

Date of Brand Performance Check:

05-07-2021

Conducted by:

Niki Janssen

Interviews with:

Alexandra Letts, Sustainability Manager Martine Riblan, Sustainability Specialist Francesco Sineri, Operations Director Apparel Sofia Benedetti, Quality Control Specialist Kai Blessenohl, Costing Manager Marco Mosca, Accounting Coordinator Ruth Oberrauch, Head of Sustainability and on behalf of the ownership/CEO