

Brand Performance Check SALEWA, DYNAFIT & Wild Country

Publication date: August 2020

This report covers the evaluation period 01-01-2019 to 31-12-2019

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.

Brand Performance Check Overview

SALEWA, DYNAFIT & Wild Country Evaluation Period: 01-01-2019 to 31-12-2019

Member company information	
Headquarters:	Bolzano , Italy
Member since:	2013-09-24
Product types:	Outdoor products;Outdoorwear
Production in countries where Fair Wear is active:	Bangladesh, Cambodia, China, Myanmar, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, Austria, 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	96%
Benchmarking score	84
Category	Leader

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

SALEWA, DYNAFIT & Wild Country has shown progress and met most of Fair Wear's performance requirements. In 2019, SALEWA, DYNAFIT & Wild Country monitored 96% of its supply chain through Fair Wear audits, external audits and monitoring in low-risk countries, thereby meeting the required monitoring threshold after three years of Fair Wear membership. With a benchmarking score of 84, SALEWA, DYNAFIT & Wild Country is awarded the 'Leader' category.

In 2019, the core focus for SALEWA, DYNAFIT & Wild Country was living wages. SALEWA, DYNAFIT & Wild Country is very proud of the internal system it has established to evaluate benchmarking and calculate and process Living wage targets across suppliers. This couldn't have happened without the support and collaboration between the apparel team and the CSR team. Through the new system, SALEWA, DYNAFIT & Wild Country collected extensive data on wages and its composition as paid by suppliers. This includes regular wage benefits and overtime incomes for lower-paid, modal, and higher-paid workers. SALEWA, DYNAFIT & Wild Country made a comparison of the wages paid to workers and several living wage benchmarks, the minimum wage, the trade union demand, and the local stakeholder demand. The analysis revealed that a vast majority of the production locations paid above the legal limit, however, still below living wage benchmarks.

SALEWA, DYNAFIT & Wild Country set its target wage at 20% above a country minimum wage. The analysis shows that the brand achieved its target wage at 84% of its total production volume in high-risk countries (excluding low-risk countries production volume).

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

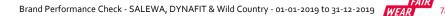
Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	33%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	2	4	0

Comment: At 33% of its suppliers, SALEWA, DYNAFIT & Wild Country buys at least 10% of production capacity. This an decrease by 17% of the total brand FOB in comparison to the previous financial year. SALEWA, DYNAFIT & Wild Country successfully consolidated its supplier base. Though there was an overall leverage increase for SALEWA, DYNAFIT & Wild Country at the main suppliers, the supplier base also grew and expanded, thus the supplier-related changes make the outcome of this indicator more unpredictable for this brand, even though the brand is consolidating.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT & Wild Country to consolidate its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions. 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
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	21%	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: 21% of the production volume from production locations comes from sites where SALEWA, DYNAFIT & Wild Country buys less than 2% of its total FOB.



Recommendation: Fair Wear recommends SALEWA, DYNAFIT & Wild Country to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, SALEWA, DYNAFIT & Wild Country 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.	76%	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: SALEWA, DYNAFIT & Wild Country has a sourcing strategy built on long-lasting partnerships with suppliers to deliver high-quality products consistently. In 2019, 74% of the production volume of SALEWA, DYNAFIT & Wild Country comes from production locations where the brand's business relationship has existed for at least five years.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT & Wild Country to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff.

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 2019, SALEWA, DYNAFIT & Wild Country on-boarded eleven new production locations and for all the questionnaire has been returned. Collecting and approving the questionnaire is part of SALEWA, DYNAFIT & Wild Country'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 has a written, systematically organized due diligence process at new production locations, which 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 high-risk 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.

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	0

Comment: SALEWA, DYNAFIT & Wild Country has a system in place to evaluate suppliers' social compliance status based on audit findings 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 finding (for example workers exceed 6oh/week)

2. All findings related to one labour standard combined: such as the aggregated results on overtime (see indicator 1.7) and a living wage (see indicator 1.11)

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

SALEWA, DYNAFIT & Wild Country values supplier evaluation and 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.

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: SALEWA, DYNAFIT & Wild Country has a systematic production planning system per style. Each delivery date is calculated carefully taking into an account provided the factory's capacity, which is then updated on a monthly bases. The brand issues 3-4 orders per season, tracked and monitored through monthly updates. In case of a production delay, the brand is flexible with delivery dates or agrees on a shipment via air.

After each season SALEWA, DYNAFIT & Wild Country does an evaluation of each order, looking at how close the actual delivery of each stage was to the plan. This helps SALEWA, DYNAFIT & Wild Country to better understand where delays might happen and which suppliers may not be able to fulfil the planned commitments.

The brand is working and estimates the standard labour minutes for each style. This calculation is included in a very elaborated matrix with additional information related to wages and production capacity. The brand has also started collecting a labour minute product calculation tool from its suppliers, but this became a challenge. Therefore, the brand has created another way of collecting information from its suppliers.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT & Wild Country to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

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 2019, SALEWA, DYNAFIT & Wild Country enhanced its existing root cause discussion which starts with a discussion with suppliers on the recurring issues at the factory. The extensive questionnaire upon which the discussions are based was enhanced to include new questions to identify the root causes and include more information from the brand. SALEWA, DYNAFIT & Wild Country worked together with another Fair Wear brand to analyse the questionnaire with follow up by requesting new audit.

Following the gathered insight and analysis of root causes for excessive overtime at suppliers, SALEWA, DYNAFIT & Wild Country is still gathering more information however is yet to follow up with more actions to eliminate the root causes and start reducing excessive overtime.

Recommendation: Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends SALEWA, DYNAFIT & Wild Country to actively take measures when excessive overtime is found. Taking measures to ensure that SALEWA, DYNAFIT & Wild Country knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

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	0

Comment: SALEWA, DYNAFIT & Wild Country works with an extensive cost breakdown calculation per styles, including estimation of cost composition and the workmanship cost. The supplier is in the lead to provide labour costs. The costing manager cross-checks the costs based on a calculation tool that approximates the labour costs per style based on the complexity of garment, the technical experience of a factory, added features etc. During the performance check SALEWA, DYNAFIT & Wild Country showed an example where the supplier calculated the labour costs too low according to its calculation tool and where SALEWA, DYNAFIT & Wild Country raised the labour costs component of the price.

SALEWA, DYNAFIT & Wild Country has a progress tracking system to estimate production input and output at the factory. The system is used to gather more information such as waste and estimated factory efficiencies (per production lines) and this can be cross-checked with worker information and wage-slips. The next steps are to create a better feedback loop with the factory, to cross-check the information carried over. The information gathered and factory input can be incorporated into the annual planning with suppliers to create more accurate estimations of numbers.

SALEWA, DYNAFIT & Wild Country uses audits and the wage ladder and maintains an up to date document with current minimum wage and living wage levels per country, which is cross-referenced before prices are set in order to ensure minimum wage levels are covered.

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.	Yes	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.	0	0	-2

Comment: In 2019, FWF audits showed no explicit findings to fail to pay legal minimum wage or to provide wage data to verify minimum wage. However, the findings related to payment of legal allowances, bonuses or benefits were found in the audits in China and Vietnam. The brand follows with the factories by discussing the root causes and the remediation. In some cases, the brand works jointly with another Fair Wear member. The evidence provided showed that most of the findings are still open.

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.	0	0	-1

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 continues systematically assessing wage levels in their 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. SALEWA, DYNAFIT & Wild Country has conducted an in-depth analysis for China, Vietnam, Bangladesh, Romania, Cambodia, Moldova, and Turkey, showing that a vast majority of the production locations paid above the legal limit but below living wage benchmarks. The brand is aware of wage levels in its supply chain received through FWF audits.

In Bangladesh, the brand's conclusions from in-depth analysis (basic wage lowered, wrongly assigned grades, causes of strikes) led to an internal communication training at several factories. The aim of this training was to inform the factory workers how the wages and the workers' category grades are calculated. A document showing calculations for all grades in local language was posted on the factory notice board. Through a communication training, the factory workers became aware of the process in setting up the wages.

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	ο

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: SALEWA, DYNAFIT & Wild Country has set its target wage at 20% above a country minimum wage. The brand has worked on the extensive wage analysis and in combination with its purchasing strategy, the goal is to increase the wages across all brand's suppliers instead of some isolated projects. The brand chooses the highest Living Wage benchmark per country and the region. In some cases, the in-depth analyses showed, that the price provided by the factory does not support appropriate labour cost. The brand would inform the supplier and discuss a higher purchasing price.

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.	84%	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 shows that the brand has achieved its target wage at 84% of it total production volume in high risk countries (excluding low risk countries production volume). Throughout the analysis, the mode is used for calculating a target wage.

Purchasing Practices

Possible Points: 52

Earned Points: 41

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	1%	
% of production volume where approved external audits took place.	9%	
% of production volume where Fair Wear audits took place.	66%	
% of production volume where an audit took place.	76%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	20%	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.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	96%	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

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 ensures that audit reports and CAPs are shared with and discussed 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 has continued in its efforts to address CAPs and the progress made at its suppliers. This effort is evaluated and included in supplier evaluation. 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.

SALEWA, DYNAFIT & Wild Country 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 showed progress on the CAP for different issues (health & safety, working hours and legally binding conditions). The CAPs are followed by CSR team with the support of the local QC teams for checking on evidence and remediation. Where possible, the brand works together on CAPs with another FWF member.

Recommendation: Fair Wear strongly recommends to ensure that the size of the supply chain and the available resources of SALEWA, DYNAFIT & Wild Country to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the amount of resources needed for active follow up. It is advised to connect more often with the suppliers to discuss progress made on CAPs.

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.	95%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: SALEWA, DYNAFIT & Wild Country visited 95% of its suppliers in the past three years.

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	ο

Comment: SALEWA, DYNAFIT & Wild Country collected 12 external audits (Bangladesh, China, Cambodia, Myanmar, Vietnam, Taiwan, Turkey), 5 of them were conducted in 2019 (Vietnam, China, Turkey, Myanmar). CAPs were created and discussed with the factories. Collecting external audit reports is also a part of the due diligence process for each new supplier.

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	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

Comment: Bangladesh

In Bangladesh, SALEWA, DYNAFIT & Wild Country had a written sourcing policy and requires that all factories it sources from are members of the Bangladesh Accord on Fire & Building Safety. Although, the brand did not sign the Accord agreement, all factories are covered under Accord monitoring. Currently, the brand has a policy related to Accord retirement, 4-months CAPs follow upandtrain the staff on fire, electrical and tructural safety. SALEWA, DYNAFIT & Wild Country has organised training with a support of FWF and external consultant related to health and safety issues at their factories. The brand is well informed about high risks, and all five suppliers have been audited.

Myanmar

In Myanmar, SALEWA, DYNAFIT & Wild Country conforms with FWF enhanced monitoring requirements, stays up to date with new developments and risks by working closely with FWF and taking on their own additional research. In 2019, there was one active factory in Myanmar.

Turkey

SALEWA, DYNAFIT & Wild Country has a written policy on sourcing in Turkey, which includes FWF requirements. SALEWA, DYNAFIT & Wild Country actively make sure that its supplier follow the provided guidelines. The brand sourced from one factory in Turkey in 2019.

Abrasive blasting

Jeans production for SALEWA, DYNAFIT & Wild Country is small but important, as an iconic product. The brand's jeans supplier is aware of the abrasive blasting policy part and the brand checks through visits that abrasive blasting is not happening.

Other risks

SALEWA, DYNAFIT & Wild Country is well-informed about other (country-specific) risks and constantly checks on the country updates through FWF updates.

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: SALEWA, DYNAFIT & Wild Country actively cooperates with other members in resolving corrective actions, in several cases taking the lead. In cases where other members lead this process, the brand could demonstrate that they are well-informed about the status of remediation.

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.	80%	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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
Member undertakes additional activities to monitor suppliers.	Yes			1	1	0

Comment: 19% of SALEWA, DYNAFIT & Wild Country's production was done in low-risk countries, of which 80% has been visited. One audit was conducted by another FWF member brand, and the report and CAP were shared. The brand also connects and works with non-Far Wear member brands sourcing from its European suppliers.

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: At tail-end suppliers, the brand's quality staff conducts the internal assessments, therefore N/A for this indicator.

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	0

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	0

Comment: SALEWA, DYNAFIT & Wild Country has one licensee in China and one in South Korea. The brand has send and received the questionnaire and both licensees have provided information on the production locations that they make use of.

Monitoring and Remediation

Possible Points: 31

Earned Points: 28

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	3	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.	1	
Number of worker complaints resolved since last check.	2	

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 to 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 requests pictures from all suppliers to ensure that the worker information sheet is posted in factories. The worker information sheets are checked by the quality control team during regular visits. The brand offered Worker Information Cards to at least two suppliers.

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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.	54%	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

Recommendation: SALEWA, DYNAFIT & Wild Country could consider implementing additional activities to raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline next to providing good quality training. This could include providing the Fair Wear worker information cards to workers during visits or when handing out payslips, making use of Fair Wear Factory Guide, stimulating peer-to-peer learning among workers and ensuring factory management regularly informs workers, in particular new workers, about their rights and available grievance mechanisms.

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: In 2019, SALEWA, DYNAFIT & Wild Country received 3 complaints, one from Bangladesh and two from Vietnam. SALEWA, DYNAFIT & Wild followed the FWF Complaints Procedure when working on the complaints received by actively following up and being involved in the remediation. Two complaints were resolved immediately and one is awaiting further verification, which SALEWA, DYNAFIT & Wild Country is actively supporting.

SALEWA, DYNAFIT & Wild Country has taken preventative steps related to the root causes by initiating training of supervisors at the Bangladesh supplier on how to communicate with workers. The worker representation was involved to address and facilitate better social dialogue. SALEWA, DYNAFIT & Wild Country advised supplier to adjust internal rules on working and to incorporate them in written contracts.

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

Comment: The complaints received in 2019 were in two factories which were not shared with other Fair Wear customers.

Recommendation: SALEWA, DYNAFIT & Wild Country could investigate whether cooperation with other customers is possible for enhancing the efforts to resolve the complaint.

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 ensures that all (new) staff are aware of FWF membership. Employee meetings, updates on the intranet and training for retail staff are ways to update the staff. The person responsible for external communication about FWF is also responsible for internal communication.

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 implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

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.

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

Comment: SALEWA, DYNAFIT & Wild Country has established structured due diligence procedures that the agents have to follow. Agents and intermediaries are actively supporting the brand in CAP follow-up and remediation of complaints

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.	20%	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.	2	6	ο

Comment: Two trainings were conducted to support the transformation process related to human rights and counted for 20% of the total brand's production volume (excluding low-risk countries). The violence prevention training was conducted at one supplier in Bangladesh. The communication training was conducted at one supplier in Vietnam.

Recommendation: Fair Wear recommends SALEWA, DYNAFIT & Wild Country to follow up on the initial training by establishing functional worker committees with a step-by-step approach and organise multiple follow-up sessions spread over several months and strengthen herewith internal grievance mechanisms. The training outline should have a worker-centered approach and focus on behavioural and structural change to improve working conditions for the long term, such as gender based violence and worker-management dialogue. To this end, SALEWA, DYNAFIT & Wild Country can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

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 actively followed up on training taken place at suppliers. SALEWA, DYNAFIT & Wild Country asks for feedback from the suppliers and helps to develop interventions whenever possible (Bangladesh).

Training and Capacity Building

Possible Points: 13 Earned Points: 9



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 checks all production locations prior to production, during production staff often visits production locations to collect information on production locations and monitor production per style and per production step. SALEWA, DYNAFIT & Wild Country keeps a well documented and up to date supplier register which includes detailed information on all production locations, including addresses, sub-contractors, number of employees and current CAP status. In 2019, two subcontractors were found and added to the production location information.

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

Comment: The CSR team works closely together with the production and costing staff and the quality control teams. They meet face to face regularly and information about working conditions at production sites is accessible to all.

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 complies with the FWF Communications Policy. The FWF 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	0

Comment: SALEWA, DYNAFIT & Wild Country's website links to their latest FWF Brand Performance Check report. SALEWA, DYNAFIT & Wild Country's discloses a list of the production country on per product through an interactive 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

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Comment: SALEWA, DYNAFIT & Wild Country has submitted its social report to FWF in time and has published the report on its website. Furthermore, the sustainability and social report with information about FWF 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 as part of the management team, therefore the CSR team is closely linked to top management. This includes bi-monthly updates on sustainability topics including Fair Wear membership.

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

SALEWA, DYNAFIT & Wild Country recommends Fair Wear to take a bigger role in facilitating dialogue with CCC, as well as act as a better mediator by also and filtering requests from CCC to member brands. Additionally, SALEWA, DYNAFIT & Wild Country would like Fair Wear to provide updated living wage benchmarks and take into consideration how regional differences within countries may affect living wage (for example, in China).

Scoring Overview

Category	Earned	Possible
Purchasing Practices	41	52
Monitoring and Remediation	28	31
Complaints Handling	13	15
Training and Capacity Building	9	13
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	106	126

Benchmarking Score (earned points divided by possible points)

84

Performance Benchmarking Category

Leader



Brand Performance Check details

Date of Brand Performance Check:

07-07-2020

Conducted by:

Sandra Gonza, Terezia Haselhoff

Interviews with:

Alexandra Letts - Sustainability Manager Martine Riblan - Sustainability Assistant Ruth Oberrauch - CEO Claudia Galvan - Purchasing & Planning Coordinator Kai Blessenohl - Costing Manager