

# **Brand Performance Check**

# **EDELRID GmbH & Co. KG**

**Publication date: June 2023** 

This report covers the evaluation period 01-01-2022 to 31-12-2022

#### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.



# **Scoring overview**

Total score: 46

Possible score: 198

Benchmarking Score: 23

Performance Benchmarking Category: Needs Improvement



#### **Summary:**

Edelrid GmbH & Co. KG (Edelrid) has shown insufficient progress on some performance indicators. With a total benchmarking score of 23, the member brand is placed in the Needs Improvement category.

Edelrid is a German mountain sports supplier. Since its establishment in 1863, Edelrid has developed into a leading manufacturer of ropes, climbing equipment, and personal protective equipment (PPE). Edelrid is a new member brand and joined Fair Wear end of 2021. This was the first performance check. The member brand defined priorities out of its HRDD requirements, as not all topics could be implemented at once at first.

Edelrid's sourcing strategy is committed to long-term relationships and consolidating its supplier base. The member brand conducted a risk scoping on the country level, collected the CoLP questionnaires, and the posted information sheets at its suppliers. Some Fair Wear and external audit reports were collected, and the member brand started working on the CAPs for its main supplier in Vietnam and another supplier in Pakistan. Edelrid needs to extend its risk scoping to the factory level and include a gender lens. This means that the member brand still must work on a proper implementation and remediation system and improvement and prevention measures based on its risk assessment.

The member brand has scored insufficient on some repeated non-compliance indicators. These need to be resolved in the next performance check, or else Edelrid will be automatically placed in the Needs Improvement category.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for member brands. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

# **Performance Category Overview**

**Leader**: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good**: It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement**: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended**: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## **Company Profile EDELRID GmbH & Co. KG**

#### **Member company information**

Member since: 1 Jul 2021

Product types: Garments, clothing, fashion apparel, Outdoor products, Sports & activewear, Workwear, Bags, Outdoorwear and Footwear

Percentage of CMT production versus support processes 94%

Percentage of FOB purchased through own or joint venture production o%

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 81%

Percentage of turnover of external brands resold o%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's Bluesign,

Number of complaints received last financial year o

#### **Basic requirements**

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

Work Plan and projected production location data have been submitted for the current financial year? Yes

Membership fee has been paid? 1

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

Production Country	Number of production locations	Percentage of production volume
Viet Nam	4	77
China	7	20
Portugal	2	2
Pakistan	2	1

# **Layer 1 Foundational system's criteria**

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: No

**Comment:** Edelrid does not yet have a Responsible Business Conduct Policy.

**Requirement:** Edelrid needs to develop a Responsible Business Conduct policy.

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.:

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.:

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: No

**Comment:** Edelrid does not have a system to identify all production locations. The brand does not have a policy regarding subcontracting.

**Requirement:** Edelrid needs to have a system to identify all production locations, including subcontractors. Edelrid needs to have a policy regarding subcontracting.

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

**Comment:** Edelrid discloses 80% of production locations internally through Fair Wear's information management system.



1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

**Comment:** Edelrid discloses 80% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

**Comment:** Edelrid communicates correctly about Fair Wear. For Edelrid's brand Red Chili, the communication about Fair Wear has to be corrected.

# Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

**Possible Points: 90** 

**Earned Points: 30** 

#### **Indicators on Sourcing strategy**

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

**Comment:** Edelrid has a sourcing strategy addressing influencing labour conditions. The member has 15 active suppliers. 93% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 7% of the production volume comes from suppliers where Edelrid buys less than 2% of its total FOB. This is comparable to the previous year. Edelrid's sourcing strategy explicitly focuses on increasing influence through consolidation.

**Recommendation:** Fair Wear recommends Edelrid to have its sourcing strategy preferably in written form, and include SMART goals. It is advised to request and check the leverage of the suppliers regularly.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

**Comment:** Edelrid has not got a formal sourcing strategy. 84% of the member's total FOB volume comes from suppliers with whom Edelrid has a business relationship for at least five years. The member does not commit to long-term contracts yet.

**Recommendation:** Fair Wear recommends Edelrid to maintain stable business relationships with suppliers. Long-term relationships 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 agreed upon with top management/sourcing staff. Fair Wear recommends Edelrid to commit to long-term contracts.

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

Comment: Edelrid conducts risk scoping on sourcing country level and has included all eight labour standards. The member has yet to include the following risk factors, sector, business model, sourcing model and product level in its risk scoping. In its risk scoping, the member has not assessed the impact and prevalence of all risks correctly. Edelrid assessed the impact/prevalence of forced labour low, while several sources indicate otherwise. The risk scoping misses a gender lens for all CoLP. The risks of sexual harassment and gender-based violence are only included in the labour standard of 'no discrimination in employment' for each country. Edelrid has yet to include input from workers, suppliers and stakeholders. The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping were included in decision-making regarding not starting new production in Türkiye due to Fair Wear's enhanced due diligence policy. To date, Edelrid's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively.

**Recommendation:** Fair Wear recommends Edelrid to include all risk factors in its risk scoping and add severity and likelihood to the country's risk scoping. The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise. Fair Wear strongly recommends Edelrid to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy. The member is urged to re-assess the impact and prevalence of the risk of forced labour in its supply chain, especially for countries with an enhanced/heightened due diligence policy.

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

**Comment:** It is the standard process for Edelrid to inform new suppliers about Fair Wear membership by sending an information package with all requirements in prior. This process has been followed for the one supplier added last year. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Edelrid can cooperate on this topic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Basic	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	2	6	0

**Comment:** Edelrid collects human rights information of potential new suppliers by collecting self-assessments and existing audit reports. The member adjusted its sourcing decisions in case potential new production locations were not open to fill out all requested information regarding CoLP. The company does not collect information from workers or stakeholders to inform the sourcing decision. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively.

**Recommendation:** Fair Wear recommends Edelrid to investigate whether an operational grievance mechanism exists. Fair Wear strongly recommends Edelrid to privilege suppliers where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

**Comment:** In the previous financial year, Edelrid added one new supplier. The member has shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted.

**Recommendation:** Edelrid is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business.

#### Indicators on Identifying continuous human rights risks



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	Basic	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	2	6	0

**Comment:** Edelrid has an ad hoc approach to identifying human rights risks in its supply chain. Edelrid has not yet set up a monitoring system. The member followed up on some CAPs and collected some external audit reports. Edelrid has not yet conducted a risk assessment on the factory level, only on the country level.

**Recommendation:** Fair Wear recommends Edelrid to approach monitoring systematically, identifying the appropriate monitoring tool and frequency depending on the outcome of the risk scoping and risk assessment. Fair Wear recommends that Edelrid not depends on audits alone and expands its monitoring instruments.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Basic	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	2	6	0

**Comment:** Edelrid has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country. The risks identified are FoA is non-existing in some countries, union trade busting, ineffective worker councils and workers having no access to independent trade unions. The risks to women workers in relation to FoA are not yet included.

**Recommendation:** Edelrid is strongly recommended to deepen its understanding of risks to FoA in its supply chain. The member is recommended to use the Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers. Edelrid should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Insufficient	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	0	6	0

**Comment:** Edelrid has not yet included gender in its risk scoping. The member could show it understands some basic gender risks for its sourcing countries, and for instance, identified job losses, lack of insurance or sick pay coverage, increased risk of gender-based violence and non-pregnancy clauses as important risks prevalent in Vietnam.

Requirement: Edelrid must include gender in its risk scoping and assessment and add the severity and likelihood.

**Recommendation:** Fair Wear strongly recommends Edelrid to enroll in the Introduction to Gender Equality programme on Fair Wear's learning platform. Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Insufficient	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	0	4	0

Comment: Edelrid does not yet evaluate its suppliers' human rights performance.

**Requirement:** Edelrid needs to evaluate the human rights performance of its suppliers systematically.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Insufficient	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	0	4	0

**Comment:** Edelrid does not yet have a system to monitor human rights as a base to prevent or respond to unauthorised subcontracting. The member has a 'subcontractor clause' for delays in delivery in its supplier contracts, which enables suppliers to use unauthorised subcontracting.

**Requirement:** Edelrid should use the outcome of its human rights monitoring to respond to unauthorised subcontracting.

**Recommendation:** Fair Wear recommends the member to improve its 'subcontractor clause' for delays in delivery in its supplier contracts.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Insufficient	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	O	4	0

**Comment:** Edelrid has not yet identified whether homework is prevalent in its sourcing countries.

**Requirement:** Edelrid should identify whether homeworkers are used by its suppliers and assess if there is a risk of exploitation.

#### **Indicators on Responsible purchasing practices**

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

**Comment:** Edelrid signs framework purchase agreements with its suppliers, which form the basis of all orders and stipulate payment terms, liability and penalties. Agreements on individual orders are made separately. The framework agreement is not accompanied by the Code of Labour Practices; the agreement itself does not support the implementation of human rights due diligence. The member has a 'subcontractor clause' for delays in delivery in its supplier contracts, which enables suppliers to use unauthorised subcontracting.

**Requirement:** Edelrid needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence.

**Recommendation:** Fair Wear strongly recommends that Edelrid remove penalties for late delivery from its contracts or at least ensure there is 'proof of fault by the supplier'. Edelrid is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in their decision-making processes.	Basic	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	2	6	0

**Comment:** Edelrid actively shares relevant CSR information with other departments. The other relevant departments don't actively share information leading to coherent responsible business practices with CSR. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

**Recommendation:** Fair Wear recommends that CSR and other relevant departments actively share information leading to coherent responsible business practices.

Edelrid could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

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

Comment: Edelrid conducts a monthly capacity planning, which is ongoing and reflected in a dispo-calendar. The member shares its forecast of one year, often one year prior, with its suppliers. The product categories are not depending on seasons. Edelrid knows for the main part of its suppliers the factory's production capacity and the capacity needed for its order. For garment suppliers, the member does not know the production capacity due to its small leverage. Edelrid constantly exchanges with its suppliers and adjusts the forecast or works jointly on solutions if suppliers cannot keep the delivery date. In 2022 the member often took over the airfreight cost in case of delays or accepted partial shipments. The reasons for delays were late fabric and the wrong calculation from suppliers of the production minutes effectively needed.

**Recommendation:** Edelrid could use the Fair Working Hours Guide to assess its purchasing practices and potential impact on working hours and discuss this with its suppliers. Fair Wear recommends the member to explore planning production in minutes instead of pieces to better assess its suppliers' production capacity (and wage levels). Furthermore, at suppliers where Edelrid is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season.

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

**Comment:** Edelrid has no understanding of the wage levels at its suppliers and does not connect this understanding to its buying prices. The member has basic insight into the labour component of its prices and knows the number of actual sewing minutes needed for a style. Edelrid knows the labour minute value at its main supplier.

**Recommendation:** Edelrid could provide suppliers who do not work with fact-based costing, training on product costing and how to quote prices, including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries. Edelrid is recommended to investigate wage levels in production countries and at its suppliers. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

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

**Comment:** Edelrid has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP)

**Recommendation:** Fair Wear recommends Edelrid to enable its intermediaries to support CoLP implementation actively.

# **Layer 3 Remediation and impact**

**Possible Points: 90** 

**Earned Points: 6** 

#### Indicators on Quality and coherence of prevention and remediation system

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Insufficient	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	0	6	0

**Comment:** Edelrid has not made risk profiles per supplier and has not drafted follow-up plans. Edelrid started its risk scoping on the country level.

**Requirement:** Edelrid is required to expand its risk scoping to the factory level and ensure that prioritisation in follow-up matches the factory's risk profile.

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

**Comment:** Edelrid has not yet included a gender lens in any of its improvement and prevention programmes. Edelrid still needs to define improvement and prevention programmes, as it is the member's first performance check.

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

**Comment:** Edelrid has not yet included steps to encourage FoA and effective social dialogue in its improvement or prevention actions.

**Requirement:** Members must include steps to promote FoA and social dialogue in its improvement or prevention actions. This should be linked with its assessment of risks to FoA and social dialogue as part of its human rights monitoring (see indicator 2.8). Examples of steps that could be included can be found in Fair Wears brand guide on FoA and collective bargaining.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Insufficient	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	0	6	0

**Comment:** Edelrid does not assess its suppliers' internal grievance mechanisms at the start of a business relationship. Edelrid is a new Fair Wear member and had to set priorities on which HRDD requirements can be worked first.

**Recommendation:** Fair Wear recommends Edelrid to support and monitor the internal grievance mechanisms at the suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Basic	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	2	6	0

**Comment:** Edelrid cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Edelrid has not yet cooperated with customers that are not Fair Wear members.

**Recommendation:** Fair Wear recommends Edelrid to document the status of joint follow-up actions. Even though one brand commonly takes the lead, it is important to be kept informed of the status.

#### **Indicators on Improvement and prevention**

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	15%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	2	6	-2

**Comment:** In the past financial year, Edelrid has received three audit reports. During the performance check, the member could demonstrate with a sample that up to a third of the CAP issues requiring improvement actions have been followed up. Examples of actions that were taken include several Health & Safety improvements.

**Recommendation:** Fair Wear strongly recommends to set up a monitoring system and to extend audits or collecting audit reports and CAPs of its suppliers. Edelrid is advised to create a CAP to follow up on in case of external audit reports.

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

**Comment:** Edelrid has not yet identified root causes of the CAP findings (other than excessive overtime assessed under indicator 3.9 or living wage assessed under indicator 3.11).

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

Edelrid should identify root causes of CAP issues and discuss these with its suppliers. The member needs to start developing preventive actions to address these root causes.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	Basic	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	2	6	0

**Comment:** Edelrid has two suppliers where improvement or prevention steps are not needed. These cover 2% of the member's total FOB. The member visited both factories in 2022 but does not have a system to ensure possible human rights risks are regularly discussed with these suppliers. Edelrid irregularly reviews changes to the risk situation.

**Recommendation:** Edelrid is recommended to create a systematic plan which details at which interval the member will discuss possible human rights risks at its suppliers and which human rights risks should be discussed.

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

**Comment:** In the previous year, one audit report of the total three audits mention excessive overtime. Edelrid has not analysed or addressed the root causes of these findings. Two of the audit report mention Edelrid's suppliers remain reluctant to be open about working hours. The member has not addressed this sufficiently yet.

**Requirement:** Edelrid should investigate to what extent its current buying practices affect the working hours at the supplier level. A root cause analysis of excessive overtime should be done to investigate the most effective steps to reduce overtime. The Fair Working Hours Guide can be used as a resource.

**Recommendation:** Fair Wear strongly recommends Edelrid to address suppliers' reluctance to be transparent about working hours.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Insufficient	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	-2	4	-2

Comment: In the previous year, one out of three audits included the following findings regarding non-payment of legally required wage elements. Entitled leaves (such as annual, statutory) are not paid as legally required, overtime premium is not paid as legally required, i.e. the factory did not set up a wage system to compare the workers' gross wage with their 'due hourly wage' to ensure sufficient payments covering both the local minimum wage and overtime premiums, workers do not receive a payslip and are not aware of the wage calculation. Two out of three audits included findings regarding failure to provide wage data. Edelrid has not responded adequately to the findings regarding legally required wage elements and the failure to provide wage data.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

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

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

Comment: Edelrid is unaware of the wage levels at its suppliers and does not discuss the topic of living wages with its suppliers.

**Requirement:** Edelrid must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. Edelrid is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers. Edelrid should have an overview of wages paid in its production locations.

**Recommendation:** Fair Wear recommends Edelrid to enrol in the Living Wage programme on Fair Wear's learning platform.

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

**Comment:** Edelrid does not have an overview of wages paid in production locations. The member has not discussed wage increases with its factories. Edelrid does not have a strategy on how to finance wage increases at its suppliers.

**Recommendation:** To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models. It is advised that the strategy for how to finance wage increases is agreed upon by top management.

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

**Comment:** Edelrid does not contribute to higher wages at any of its production locations.



**Recommendation:** We encourage Edelrid to start discussions about living wages with its suppliers and to define plans for wage increases that result in the payment of a target wage.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	Intermediate	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	2	4	-2

Comment: Edelrid received one complaint in the past financial year about employment is freely chosen and legally binding employment relationship at its supplier in Vietnam. The member actively responded to these complaints as per Fair Wear's Complaints Procedure, in cooperation with another Fair Wear member. The members informed the factory about the complaint, and the factory then accepted the resignation letter of a worker. As a result, the worker received the missing social insurance book. The complaint could be resolved, and the members checked upon the complaint during an audit. Edelrid did not yet include the outcome of these complaints to decide on follow-up in its human rights improvement and prevention plans by setting up training on a correct termination process for the factory management.

**Recommendation:** Edelrid could use the outcome of complaints to determine follow-up actions in its broader improvement and prevention plans.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Insufficient	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or genderbased violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	0	6	0

**Comment:** Edelrid has some CAP findings where training is a recommended follow-up action. The member has not yet enrolled all of its suppliers, with findings of no awareness about CoLP in the WEP training.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	N/A	6	0

Comment: Edelrid did not implement training at its suppliers (NA).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	Intermediate	Withdrawing from a non- compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0

**Comment:** In the past financial year, the member stopped with three suppliers. The ending of the cooperation was initiated by the suppliers.

**Recommendation:** Edelrid could include the responsible exit strategy as part of its suppliers' agreement or contract.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

**Comment:** Edelrid does not undertake activities related to human rights that go beyond Fair Wear's scope.

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

**Possible Points: 18** 

**Earned Points: 10** 

#### Indicators on Communication, transparency and evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

Comment: Edelrid communicates accurately about Fair Wear on its website but incorrectly for its brand Red Chili.

**Recommendation:** Fair Wear recommends Edelrid to adjust the communication about Fair Wear for its brand Red Chili.

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

Comment: Edelrid does not sell external brands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 Social report is submitted to Fair Wear and is published on the member company's website.	Intermediate	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	2	4	0

**Comment:** Edelrid has submitted its social report, which Fair Wear approved. Edelrid has also published the social report on its website. The member did not publish its social report on the website of its brand Red Chili.

Recommendation: Fair Wear recommends that Edelrid also publishes its social report on the website of its brand Red Chili.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	2	4	0

**Comment:** Edelrid published its social report, which includes some factory-level data and remediation results, on its website. The factory-level data Edelrid included are: an overview of audits, training, complaints, findings and follow-up. Edelrid has yet to disclose its time-bound improvement plans.

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

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

Comment: Edelrid has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. Edelrid has defined company goals, which include CSR goals, such as following up the work plan and Fair Wear requirements, that are also connected to the purchasing department. These goals are evaluated yearly. The member does not yet include triangulated information from external sources, such as workers and suppliers, in its evaluation system.

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

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

**Comment:** This is the first performance check of Edelrid.

## **5 Appreciation chapter**

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

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

Comments: Edelrid is part of the 'Audit Alliance Hard Goods' (AAHG) from the EOG. This initiative combines the outdoor brand's business power and good practices to assess the risks and improve social standards within the hard goods supply chain. Together with seven other brands, Edelrid has looked closely at shared suppliers in the hard goods field since 2019. The starting point has been hardware factories in Taiwan; in 2022 also, helmet suppliers in China were taken into the scope.

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

### **Recommendations to Fair Wear**

More guidance for new members would be helpful, e.g. extensive guidance on performance check preparation, as it is complex to dive into all topics and how to get started.

### **Brand Performance Check details**

Date of Brand Performance Check: 22-05-2023

Conducted by: Adele Kolos

Interviews with: - Vitus Wuhrer (Managing Director)

- Sarah Lenz (CSR-Manager)
- Gianina Illing (CSR-Manager)
- Ha Pham (Material Manager Textile)

Generated: 26 Jun 2023