



Brand Performance Check

Icebug AB

Publication date: September 2023

This report covers the evaluation period 01-03-2022 to 28-02-2023

About the Brand Performance Check

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

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

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

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

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

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

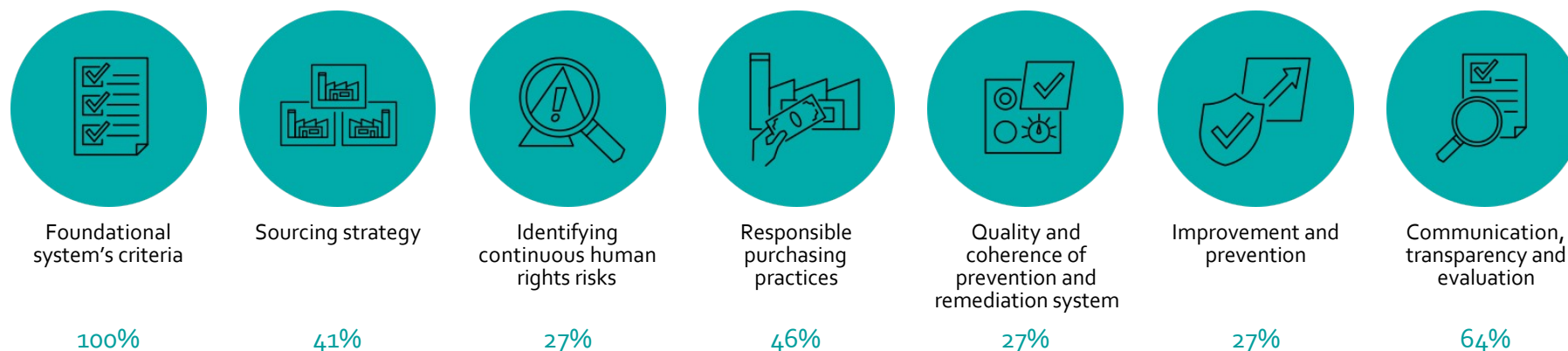
Scoring overview

Total score: 74

Possible score: 208

Benchmarking Score: 36

Performance Benchmarking Category: Needs Improvement



Summary:

Icebug has shown insufficient progress on performance indicators. With a total benchmarking score of 36, the member brand is placed in the 'Needs Improvement' category.

In its second year of Fair Wear membership, Icebug focused on collecting factory-level data by conducting Fair Wear audits at its main suppliers, which produces around 72% of its total FOB.

Icebug started to conduct the risk scoping on country level for Vietnam and includes all eight labour standards in this scoping on a basic information level. Here, Icebug mainly focuses on the Fair Wear country studies. The member brand has begun including the gender lens for some of the eight labour standards. The country-level risk scoping was only partly done for China. To identify factory-level risks, the member brand heavily relies on Fair Wear monitoring audits and follow-up of the Corrective Action Plans (CAPs) for its main suppliers. Icebug extracts the information from audit reports to the factory risk assessments on a basic level, but they do not have a factory risk assessment for all their suppliers.

Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. The team from Taiwan, therefore, visits the factories regularly to carry out quality controls and check production. In addition, an Icebug-employed sourcing expert and quality controller in China conducts regular on-site inspections at the factories.

Icebug was expected to mitigate the root causes of excessive overtime as well as to assess and respond to root causes for wages that are lower than living wages in production locations. The member did not follow up on the requirements. The member brand has scored insufficient on some repeated non-compliance indicators. These need to be resolved in the next performance check, or else Icebug 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 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 Icebug AB

Member company information

Member since: 1 Jan 2021

Product types: Outdoor products, Sports & activewear, Accessories and Footwear

Percentage of CMT production versus support processes 100%

Percentage of FOB purchased through own or joint venture production 0%

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 96%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Number of complaints received last financial year 1

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

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

Production Country	Number of production locations	Percentage of production volume
Viet Nam	4	99
China	4	1
Sweden	1	0
United States of America	1	0
Taiwan	1	0

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

Comment: Icebug has a Responsible Business Conduct Policy, but some elements, such as gender lens and social dialogue, are missing.

Requirement: Icebug needs to improve its Responsible Business Conduct Policy, to ensure better alignment with the OECD guidelines. It should address social dialogue and include a gender approach.

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.: Yes

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.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

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

Comment: Icebug discloses 100% of production locations internally through Fair Wear's information management system.

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

Comment: Icebug discloses 100% of production locations externally on Fair Wear's transparency portal.

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

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

Possible Points: 90

Earned Points: 34

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: Icebug has a sourcing strategy addressing influencing labour conditions. The sourcing strategy is included in the member brand's RBC policy. With eight active suppliers, Icebug has a small supplier base. Most of the products are sourced from Vietnam and China. Over 50% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. Over 28% of production volume comes from suppliers from whom Icebug purchases less than 2% of its total volume FOB. Due to that, Icebug has included a consolidation plan in its sourcing strategy. However, Icebug's written sourcing strategy does not explicitly focus on increasing influence through active cooperation with other clients.

Recommendation: Fair Wear recommends Icebug to consider leverage when moving its production to new suppliers. The member should consider the risk of human rights violations at suppliers, the influence it has on bringing change and the impact it can have at a factory level. Icebug could also include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers.

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: Icebug has a sourcing strategy that focuses on maintaining long-term relationships. 75% of the member's total FOB volume comes from suppliers with whom Icebug has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Icebug 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: Icebug started to conduct the risk scoping on country level for Vietnam and includes all eight labour standards in this scoping on a basic information level. Here, Icebug mainly focuses on the Fair Wear country studies. The member brand has not yet identified sector, business, sourcing model, and product-level risks. Icebug has started to include the gender lens for some of the eight labour standards. The country-level risk scoping was only partly done for China.

In its risk scoping, the Icebug has not correctly assessed the impact and prevalence of all risks. For instance, the member brand has not identified the risks of bonded labour in China. However, Icebug has identified the majority of the risks on freedom of association in Vietnam and China and has decided to start exiting China at the Tier 1 level within the next financial year.

To date, Icebug does not have a sourcing strategy where a preference for countries where workers can freely form or join a trade union and bargain collectively is mentioned.

Recommendation: Fair Wear recommends Icebug to include all production countries and risk factors in its risk scoping. The member is urged to assess the risk of forced labour, limited freedom of association and social dialogue in its supply chain.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Intermediate	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.	2	4	0

Comment: Icebug defined an onboarding process for new suppliers in its sourcing strategy, which is part of the RBC policy. The process applies before placing the first order. The member defined different actions that need to be taken for onboarding a new supplier: 1. Icebug creates general awareness towards the supplier of the prevention of human rights risks and informs the supplier about Fair Wear membership and screens the human rights of the supplier by sending the questionnaire based on the eight Code of Labour Practices (CoLP). 2. For the second step, the member asks if the factory has a responsible person for gender-related topics and democratically elected worker representatives. 3. Icebug assesses whether an effective operational-level-grievance mechanism is established in the factory. The member brand also informs the supplier about the Fair Wear complaint hotline. 4. If the supplier is located in another production country, Icebug intends to do the country-level risk scoping.

Icebug is not aiming to onboard new factories or production countries in the next few years. However, one Chinese supplier was onboarded to produce accessories for Icebug in 2022. The factory signed the Fair Wear CoLP and the Worker Information Sheet (WIS) posted. The other described steps have not been followed for the new supplier that was added.

Recommendation: Fair Wear strongly recommends that Icebug always engages in a dialogue with new suppliers about Fair Wear requirements and how to cooperate in implementing these. Since Icebug has a team on-site through the shareholder in Taiwan (who is also the sourcing agent at the same time), Fair Wear recommends involving the team in the onboarding process of new suppliers.

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: Icebug collects human rights information of potential new suppliers by collecting the Fair Wear CoLP questionnaire. In the last financial year, 2022/2023, Icebug did not collect human rights information about the new supplier. The new factory was onboarded by purchasing to produce short-term accessories such as caps.

Recommendation: Fair Wear recommends Icebug conduct human rights research for potential new suppliers by collecting existing audit reports and requesting additional information from suppliers when information is missing. Fair Wear encourages the member brand to collect worker and stakeholder input before placing the first order. Fair Wear also recommends that the member discusses the content of the CoLP and requests evidence that confirms the supplier's support of the CoLP.

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: Icebug has added one new supplier. Icebug has shared information about Fair Wear's CoLP and the complaints helpline within the first year of business. The Worker Information Sheet has been posted. Icebug has not yet organised onboarding sessions for its new supplier to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue.

Recommendation: Icebug 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: Icebug has an ad hoc approach to identifying human rights risks in its supply chain. The member brand heavily relies on Fair Wear monitoring audits and follow-up of the CAPs for its main suppliers. Icebug extracts the information from audit reports to the factory risk assessments on a basic level, but they do not have a factory risk assessment for all their suppliers. Icebug aims to conduct social audits at its production locations on a regular basis. It follows up regularly on findings after receiving the audit report. Icebug prioritises follow-up based on the urgency of the finding and on remediability, starting with health and safety issues.

Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. The team from Taiwan, therefore, visit the factories regularly to carry out quality controls and check production. In addition, an Icebug-employed sourcing expert and quality controller in China conducts regular on-site inspections at the factories. The production team in Sweden has frequent exchanges with them. When possible, all suppliers are regularly visited by the Head of Production before placing the order to understand the setup of the production locations and ensure there are no obvious human rights violations. The results from the on-site visits are not included in the risk analysis.

Recommendation: Fair Wear recommends Icebug 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 Icebug not depends on audits alone and expands its monitoring instruments. It is also advised to include outcomes of on-site visits more systematically in the risk assessment.

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: Icebug has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country. One of the identified risks is that FoA does not exist in the member brand's main production countries. Therefore Icebug identified ineffective worker councils, a lack of collective bargaining and workers having no access to independent trade unions. The risks to women workers in relation to FoA are not yet included.

Recommendation: Icebug 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. Icebug 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.	Basic	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.	2	6	0

Comment: Icebug has partly included gender in its risk scoping and mostly focussed on the labour standard of 'no discrimination'. For instance, the member brand identified discrimination against women during internal recruitment procedures in Vietnam by testing pregnancy status during recruitment or paying lower salaries to workers on maternity leave. Icebug also identified on country level that sexual harassment at work is a serious concern in the garment industry in Vietnam.

On factory level, Icebug only refers to Fair Wear monitoring audits and CAP findings. For one factory in Vietnam, Icebug identified the risk that pregnant women and young mothers are not treated in accordance with legal requirements.

Recommendation: Fair Wear recommends Icebug to enroll in the Introduction to Gender Equality programme on Fair Wear's learning platform. Fair Wear recommends the member to collect country and factory-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: Icebug has invested time into building relationships with the production location. This process has always been based on a continuous evaluation of the relationship, focused on product quality, costs, delivery and performance. The company is small, and information on suppliers is regularly shared between different people and departments. Icebug also uses Trustrace, a transparency tool for product traceability, to evaluate products according to environmental aspects. But the supplier evaluation does not include criteria for compliance with the CoLP.

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

Recommendation: Fair Wear encourages Icebug to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement.

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.	Intermediate	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.	2	4	0

Comment: Icebug has long business relationships with most of its production locations. Icebug's staff often travels to locations during production, enabling them to check if the factory's agreed production volumes are currently being produced. After the COVID-19 lockdown in Vietnam, Icebug was able to visit its suppliers again. Icebug's employees from China and the agent's staff from Taiwan are regularly on-site at the factories to do quality checks. Before an order is placed, the production location is double-checked and added to the system with the help of the quality check report. However, this process is not applied to the Chinese factories. Icebug's focus is on the Vietnamese factories.

Icebug does not have a written policy about unauthorised subcontracting.

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.	0	4	0

Comment: Icebug has not identified whether homework is prevalent in its sourcing countries. According to the member brand, there is a very low risk of homeworkers being used by its suppliers because special machines are required for shoe production.

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

Recommendation: Fair Wear recommends Icebug to conduct a capacity analysis looking into specific production processes to validate the suppliers' statements that no homeworkers are used.

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: Icebug does not use contracts with its suppliers. The member has agreements in the form of purchase orders that stipulate delivery times and terms of payment.

No evidence of late payments to suppliers by Icebug was found. Icebug's payment terms with suppliers are to pay the invoices 60 to 90 days after the proof of shipment is provided. For two suppliers in Vietnam, the agent (and shareholder) in Taiwan is responsible for the payment. However, Icebug has granted a credit here as a buffer and for pre-financing.

The intermediary (and shareholder) from Taiwan has the same payment terms as Icebug has with all the suppliers.

Requirement: Icebug 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 Icebug to include the shared responsibility of CoLP implementation in its contracts, including fair payment terms. Icebug 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.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: Icebug is a small company. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with Key Performance Indicators (KPIs), supporting good sourcing and pricing strategies.

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: Icebug's production planning is based on two seasons: spring/summer and fall/winter. The product development starts about two years before the first order is placed. On average, the production process requires two sampling rounds also to prevent the need to re-produce the products due to quality defects. Icebug forecasts eight months in advance and places the order six or four months before the start of the season and the start of sales. In most cases, the order placement shows less volume than the forecast. During production, there is an excel-sheet based system to track the process. Icebug sells its products in its online shop as well as through retailers. The B2B business with the retailers is important for Icebug and is relevant to define the production volume and quantities.

Icebug's agent in Taiwan (and shareholder) and Icebug's employees in China are closely involved in the sourcing and sampling processes and, therefore, in close contact with the factories in Vietnam and the office in Sweden. Icebug partially nominates materials and buys outsoles and midsoles directly from the suppliers. Nevertheless, the member brand always buys ready-made garments (FOB) from its four main suppliers.

Icebug does know the production capacity of its production locations. The member brand asks its production locations to set deadlines.

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: After developing a new product, Icebug sends target prices to the supplier. This price is based on the first samples, suggested retail prices, as well as prices of similar products. The member brand asks the supplier to complete a detailed costing sheet to overview the cost breakdown. Icebug uses open costing for almost all styles. The costing sheet shows costs for fabric, lining, outsoles, packaging, labour costs, factory profit margin, and overhead costs. Icebug does not negotiate the set prices from the supplier.

The member brand does know the percentage and amount of labour costs included in the calculated FOB price. Icebug also has a rough overview of wages in the factories so that the member brand can link its price to the labour costs to check if it covers minimum wages at least. However, Icebug cannot create a direct link from its share of paid FOB prices to the wages paid to the workers.

One of Icebug's suppliers participated in a Fair Price App seminar in Vietnam in 2022.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding 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: Icebug works with an agent in Taiwan who is also a shareholder and co-owner of 30% of Icebug. The local agent is an important partner for the cooperation with the two main suppliers in Vietnam. The agent supports Icebug in the sourcing process and quality control. Icebug's agent (and shareholder) from Taiwan is informed about the Code of Labour Practices and is involved in implementing the Fair Wear requirements.

Since 2022, Icebug works with a new intermediary in Sweden. The intermediary was informed via email about Fair Wear membership and the CoLP.

Recommendation: Fair Wear recommends the member actively train all agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

Layer 3 Remediation and impact

Possible Points: 96

Earned Points: 26

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.	Basic	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	2	6	0

Comment: Icebug started creating follow-up plans for its suppliers of its high-risk sourcing countries based on audit and training reports and complaints. The follow-up plans do not specifically take the supplier's risk assessment into account. The follow-up plans describe a general contextualisation and the brand's monitoring actions. Here, the member brand heavily relies on CAPs. No prioritisation or concrete follow-up plans have yet been drafted.

Recommendation: Fair Wear recommends the member to further improve its follow-up plans. Icebug should ensure that all factories have a follow-up plan that matches their 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.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: Icebug has partly included gender in the improvement programme, focussing on the labour standard 'no discrimination'. Here, Icebug mainly focuses on solving the findings of the CAP. Icebug addressed these topics, especially in dialogue with the supplier during the on-site visits.

Recommendation: Icebug is recommended to extend its gender lens to the implementation of all its improvement actions.

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.	0	6	0

Comment: Icebug 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.

Recommendation: Icebug is recommended to support coordinating training on FoA and social dialogue for its suppliers. Icebug is strongly encouraged to ensure worker representatives are involved in the steps the member takes to promote freedom of association and effective social dialogue.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports 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: Icebug does not actively support and monitor the effectiveness of internal grievance mechanisms. In the first two years of Fair Wear membership, Icebug argues, to focus on implementing the Fair Wear grievance mechanism.

One CAP showed that internal grievance mechanisms have been established but are not functional. Icebug did not follow up on this with the supplier.

Requirement: Icebug needs to assess the existence and functioning of internal grievance mechanisms systematically; it also needs to support and monitor its functioning.

Recommendation: Fair Wear recommends Icebug to support and monitor the internal grievance mechanisms at supplier. It is also strongly recommended to respond when internal grievance mechanisms are not functioning.

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.	Intermediate	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.	4	6	0

Comment: Icebug cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At one supplier where Icebug plans to implement a living wage project, the member brand reached out to other customers to invite these buyers to join the project as well. Icebug has yet to start cooperating on taking preventive measures.

Recommendation: We recommend Icebug to also work together on preventing human rights violations.

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.	51%	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.	4	6	-2

Comment: In the past financial year, Icebug has received four audit reports. Together with other Fair Wear members, three Fair Wear audits and one external audit were conducted. During the performance check, the member could demonstrate with a sample that up to half of the CAP issues requiring improvement actions have been followed up. Improvement actions relate primarily to health and safety findings.

Recommendation: Fair Wear recommends Icebug also to address more complex findings. It is also recommended that Icebug provides training its employees in China to work on improvements of the CAP on-site.

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: Icebug 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.

Icebug 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.

Recommendation: Fair Wear recommends Icebug to identify root causes of CAP issues together with its suppliers. Fair Wear also recommends Icebug to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no 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: Icebug has a supplier in Sweden where improvement or prevention steps are not needed. This covers less than 1% of the member's total FOB. Employees in purchasing sometimes visit the production site. The member does not have a system to ensure possible human rights risks are regularly discussed with these suppliers.

Recommendation: Icebug 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, all four audit reports mention excessive overtime. One audit discovered that overtime hours are conducted but not documented. Icebug started to analyse the root causes of these findings by reaching out to the suppliers. According to the member, it is a big challenge due to its small leverage in the factories. Icebug has not addressed this sufficiently yet.

Requirement: Icebug 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: With its suppliers where excessive overtime occurs, Fair Wear recommends Icebug to verify whether production is planned with overtime. If production is planned with overtime, the brand should ensure that its products can be produced during regular working hours. Fair Wear also advises Icebug to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable.

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

Comment: In the previous year, two audits included findings regarding non-payment of legal minimum wage. Both factories have not ensured workers are paid legal minimum wages during the lockdown period due to COVID-19 in 2021. For one supplier being in lockdown for two weeks in July 2021, Icebug collaborated with another Fair Wear member brand. With the collected data, Icebug and the other Fair Wear member brand shared an overview showing that at least the legal minimum wages were paid. The other Fair Wear member brand supported the supplier financially. During the audit, it was shown that the factory paid workers the minimum wage for a work stoppage period of 14 days, but this was not negotiated with workers as required by local laws. With its main supplier in Vietnam, responsible for 51% of Icebug's FOB, the member brand offered financial support to cover wages for suspended workers during the lockdown. For this reason, Icebug paid 86,000 USD for workers' wages and other COVID-19-related costs, about its leverage of 25%. The audit also showed that the factory paid workers the minimum wage for a work stoppage period of 14 days, but this was not negotiated with workers as required by local laws.

In China, the government tightened the COVID-19 regulations at the end of February 2022, resulting that many factories in specific areas had to shut down. Icebug could show during the Brand Performance Check that its suppliers were not affected by the lockdown.

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

Comment: Icebug has an overview of the wage levels at its suppliers. The overview shows the average wages without overtime (with bonuses). As a comparative value, Icebug uses the Anker benchmark (Global Living Wage Coalition) for the respective regions of Vietnam and China. The overview shows the average values of the lowest wages as well as the highest-paid wages. Most of the wage data comes from Fair Wear audit reports. This overview shows that most suppliers pay the estimated Living Wage of the Anker benchmark of the Global Living Wage Coalition. The brand has not yet discussed the root causes of living wages in detail with its suppliers, such as low prices, productivity issues, etc.

With one of its suppliers in Vietnam, which produces 20% of its total FOB, Icebug and another Fair Wear member brand discuss the topic of wages. Together both brands decided to implement a living wage pilot project in 2023.

Recommendation: Fair Wear encourages Icebug to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

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: Icebug already has an overview of the wage levels in its main factories and wants to use this to build a strategy and set a target wage. Nevertheless, in 2022, Icebug has not determined and financed wage increases. The member has not discussed wage increases with its factories.

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

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.

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: Icebug does not contribute to higher wages at any of its production locations.

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: Icebug received one complaint in the past financial year about living wage and legally binding employment relationship at one of its suppliers in Vietnam. The complainant was dismissed due to being absent five days after Lunar New Year in Vietnam and did not receive the remaining salary nor a formal dismissal decision. Another Fair Wear member sourcing in that factory took the lead in solving the complaint. Icebug was in close contact with that member and communicated that to the supplier. The complaint was solved, and the factory paid the outstanding salary to the worker and provided the dismissal decision to apply for the unemployment allowance.

Icebug did not yet include the outcome of these complaints to decide on follow-up in its human rights improvement and prevention plans.

Recommendation: Icebug 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.	Intermediate	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	4	6	0

Comment: The member brand has enrolled two suppliers in a Workplace Education Programme (WEP) basic training. Icebug has one supplier in Vietnam where CAP findings show that training is a recommended follow-up action. The member brand did not yet follow up on this.

Recommendation: Icebug 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.	Insufficient	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.	0	6	0

Comment: Icebug has not yet used the results of the training as input for its human rights risk monitoring.

Requirement: Fair Wear requires Icebug to discuss the outcome of training with its suppliers and agree on the next steps.

Recommendation: Fair Wear recommends Icebug to use the training results as input for Icebug's human rights risk monitoring.

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: Icebug's human rights risk monitoring does not include a responsible exit strategy. In the past financial year, the member did not stop working with any of its suppliers, but the member brand started communicating and preparing the exit from suppliers in China. Here, the member started to follow the steps of a responsible exit, as outlined in Fair Wear's Responsible Exit Strategy Guide.

Recommendation: Icebug could include a responsible exit strategy as part of its sourcing strategy and discuss its exit strategy with all suppliers.

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

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 14

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: Icebug communicates accurately about Fair Wear membership on its website. The member brand does not yet use other channels to inform customers and stakeholders about Fair Wear membership.

Recommendation: Icebug could develop materials about Fair Wear membership to share with retailers and (web)shops. The Fair Wear third-party resellers flyer can support in explaining Fair Wear, Fair Wear's work and the communication rules for third parties.

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

Comment: Icebug 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.	Advanced	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	4	4	0

Comment: Icebug has submitted its social report and has also published the report on its website.

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

Comment: Icebug published its social report, which includes some factory-level data and remediation results, on its website. Icebug also reports on factory-level data and remediation results in its social report. Icebug has not yet disclosed its time-bound improvement plans.

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: Icebug has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. Top management is involved in Fair Wear membership. There are frequent meetings with the top management to discuss preventing and remediating human rights violations. Icebug is a small company where information about production locations is regularly shared between the relevant staff and departments. In its evaluation system, the member does not yet include triangulated information from external sources.

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

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

Comment: The member brand followed up on three of six requirements of the previous Brand Performance Check. This means that Icebug started to conduct human rights due diligence of its production locations in compliance with the Fair Wear risk policies. Icebug also implemented a systematic approach to following the CAPs in 2022/2023. The member brand developed a holistic overview of all CAP findings. Icebug has also informed all production locations about the Fair Wear CoLP and complaints hotline, and the Worker-Information-Sheet is posted.

Icebug was expected to mitigate the root causes of excessive overtime and assess and respond to root causes for wages that are lower than living wages in production locations. The member did not follow up on these requirements.

Recommendation: Icebug is strongly recommended to address the requirements that are still outstanding.

5 Appreciation chapter

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

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

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

Recommendations to Fair Wear

In general, Icebug has mentioned that they are pleased with Fair Wear membership. In particular, they find concrete recommendations for the respective indicators helpful. This gives them a clear direction and what should be improved. The member brand also mentioned that the new Fair Wear member hub is beneficial, especially for conducting risk scoping and risk assessment.

Nonetheless, especially after audits, Icebug has received complaints from suppliers about the critical language that Fair Wear auditors are using. Icebug wants to create a more positive attitude about Fair Wear towards its suppliers and recommends Fair Wear to highlight also positive findings during the audit. It was also mentioned that Fair Wear only uses the Asian Floor Wage benchmark in audit reports, not the Anker benchmark. It would also be helpful for the member brand to show a reference to the Anker benchmark.

As Icebug is a particularly small brand, the transition to the new BPC Guide 2022 was a big challenge due to the available resources. The member brands see a lot of additional work in creating all the documents.

Brand Performance Check details

Date of Brand Performance Check: **13-06-2023**

Conducted by: **Victoria Lauer**

Interviews with: **Maria Munther** (Sustainability Manager)

David Ekelund (CEO)

James Varkey (CFO)

Jerome Manceau (Head of Development & Production)

Sebastian Lundfall (Communication & Marketing)