



## BRAND PERFORMANCE CHECK

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Jack Wolfskin

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this report covers the evaluation period 01-10-2016 to 30-09-2017

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation 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. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF'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 FWF 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 FWF 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 FWF'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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# BRAND PERFORMANCE CHECK OVERVIEW

Jack Wolfskin

Evaluation Period: 01-10-2016 to 30-09-2017

MEMBER COMPANY INFORMATION	
Headquarters:	Idstein/Ts., Germany
Member since:	01-07-2010
Product types:	Outdoor
Production in countries where FWF is active:	Bangladesh, China, Indonesia, Myanmar, Turkey, Viet Nam
Production in other countries:	Cambodia, Germany, Italy, Korea, Republic of, Slovenia, Taiwan
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	99%
Benchmarking score	82
Category	Leader

## Summary:

Jack Wolfskin has shown advanced results on performance indicators and has made exceptional progress. It has 100% of its supply chain monitored, hence meeting the required monitoring threshold of 90% for this financial year. Jack Wolfskin has built up close partnerships with its main suppliers, which allows them to cooperate and work effectively on the remediation of monitoring findings. Jack Wolfskin works closely with an external auditing company, which audits its suppliers frequently. Because of these achievements, FWF has placed Jack Wolfskin in its 'Leader' category.

Jack Wolfskin has engaged in advanced public reporting. Its direct supplier list is published online, allowing a high degree of transparency. In addition, the Brand Performance Check has been published on its website. Due to time constraints, Jack Wolfskin has not handed in its social report for 2017, which is one of FWF's basic requirements. Jack Wolfskin has started to promote participation in FWF's Workplace Education Programme (WEP), and several suppliers have joined this programme during this evaluation period. Together with two other outdoor clothing brands, Jack Wolfskin has developed a training programme for its suppliers in Myanmar. Given the complex complaints the member brand received over the course of the last evaluation period, Jack Wolfskin has shown great effort in complaints handling by involving both the factory management and worker as well as stakeholders at various levels.

Jack Wolfskin joined FWF's living wage incubator in 2016 and has been working with other FWF member brands on finding solutions for paying living wages. Considering the variety of products the member brand sells, this is a difficult task, but Jack Wolfskin could look into possibilities to consolidate its supplier base and concentrate its production more, in order to have a bigger impact on improving working conditions. FWF also advises Jack Wolfskin to look more closely into the root causes of overtime with its suppliers and to seek joint approaches to tackle these causes.

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

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

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

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

## 1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	77%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

**Comment:** Most of the production is done at locations where Jack Wolfskin buys at least 10% of production capacity.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	33%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	0	4	0

**Comment:** Jack Wolfskin has a big tail, it has several suppliers where it produces a small percentage. It uses these suppliers mostly for accessories such as for gloves.

**Recommendation:** FWF recommends Jack Wolfskin to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, Jack Wolfskin should determine whether suppliers where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	64%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

Comment: Two third of Jack Wolfskin's production volume is from production locations where a business relationship has existed for at least five years.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All new production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: 14 new production locations have been added in 2017. In general, all related and required documents are maintained and in place. Only for the new production location in Ukraine the signed Code of Labour Practices was missing. However, all production sites have been audited before first orders have been placed (see 1.4).

Recommendation: Jack Wolfskin needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all new production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

**Comment:** Jack Wolfskin follows an assessment process and evaluation system for selecting new suppliers. Technicians and sourcing staff are usually the ones traveling to the production site already at a very early stage. They are well informed about CSR issues and what needs extra checking for example via the OHS checklist. Before the first order is placed, an independent social audit is scheduled.

In addition to the 3rd party audits, Jack Wolfskin collects and evaluates existing audit reports. The supplier evaluation includes topics like technical skills of a supplier, their communication, social compliance aspects, product development, purchasing etc. Representatives of different departments (including CSR) are part of the rating process. The final decision if a new supplier is ready to produce for Jack Wolfskin is made in these meetings based on the assessment.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

**Comment:** Jack Wolfskin has a supplier rating system. Supplier evaluation is done after production for each season (twice a year) and includes the progress over various years. The evaluation is used for future sourcing decisions. Results are shared with the suppliers.

Whether it is possible to increase orders depends on the necessary production capacity and the production capacity of the supplier.

Suppliers who score low on the human rights due diligence standard of Jack Wolfskin are more intensively monitored. Efforts are put in place to bring improvements.

The whole rating system is based on a traffic light system. In case a supplier is rated "red", the supplier is informed and special care for this supplier is given. CSR has a veto right in case social standards are not improving even if a supplier performs well in other categories.

Subcontractors are rated with regard to social standards and from the technical point of view and then integrated in the total rating of a supplier in direct contact with Jack Wolfskin.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** Jack Wolfskin showed to have an elaborate planning system, with order forecasting per season. The brand sees fabric availability, quality and delays as issues of concern when it comes to overtime hours at the production site. Jack Wolfskin takes holiday periods like Chinese New Year and Ramadan into account when planning production and fabric delivery.

Since Jack Wolfskin is working with independent factories, the brand has no control over the internal factory production planning. However, the brand asks the factory management to calculate with 8 working hours per day. Jack Wolfskin further checks the general production capacity and current situation of production with each factory twice a month. This is to be able to react early in case of problems during production or delivery delays. In case needed and to avoid excessive overtime, Jack Wolfskin offers to split orders.

In addition, Jack Wolfskin offered training on production planning systems. Traveling staff such as technicians try to provide guidance whenever visiting the production site.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Advanced efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	6	6	0

**Comment:** FWF conducted 8 audits in the past financial year. Overtime was found at production sites in Bangladesh, Vietnam, Myanmar, China and Indonesia.

Jack Wolfskin reports that even well structured factories sometimes ask the brand to approve overtime during a certain period (peak season). The brand asks to stay within the legal framework and not to conduct overtime on a regular basis. Documents need to be well maintained to proof that overtime is paid as per law.

Jack Wolfskin is continuously building on the relationships with their suppliers to make sure that they report issues on time and overtime hours can be prevented.

Two suppliers have asked for earlier orders to have enough time for production and Jack Wolfskin started placing orders 3 weeks earlier at these suppliers. After the first season Jack Wolfskin can evaluate if the early order placement decreases the overtime hours.

**Recommendation:** Jack Wolfskin is recommended to continue the dialogue with suppliers on the root causes of excessive overtime, provide support to manage overtime, and discuss the merit of realistic production planning on the side of the supplier. Where possible, and facing similar challenges, Jack Wolfskin is recommended to seek cooperation with other buyers at shared suppliers, to seek joint approaches where possible on causes of overtime.

Additionally it is recommended to evaluate the impact of the early order placement at suppliers and the performed overtime hours.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0

**Comment:** Jack Wolfskin has advanced and detailed shared cost calculation with vendor / supplier, per style, based on fabrics and trimmings. The brand's calculation estimate is compared to the supplier calculation after which the price is negotiated on the CMT part (this includes factory costs of overhead which are not known to Jack Wolfskin and estimate of working minutes needed per product). The vendor control department provides information on minimum wage levels to purchasing to include in the cost estimation of the CMT part. Jack Wolfskin does not know the exact cost of labour, since labour cost per garment is included in the CMT package and is not specified.

**Recommendation:** FWF encourages Jack Wolfskin to use the wealth of costing information on a style level to gain further insight into the relation between the (direct) labour costs and the wage levels of workers. FWF's report on labour minute costing offers additional guidance.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if suppliers fail to pay legal minimum wages.	Yes	If a supplier fails to pay minimum wage, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	1	2	-2

**Comment:** FWF conducted 8 audits in the past financial year. At the production site in Myanmar payment below the legal minimum wage was reported for workers in their probation period (which is in line with Myanmar laws but not with FWF's CoLP). Jack Wolfskin has directly taken action and factory management has agreed to stop this practice and pay all workers minimum the legal minimum wage.

**Recommendation:** It is recommended that Jack Wolfskin monitors regularly if all workers at their production sites in Myanmar are paid above the legal minimum wage.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** No evidence of late payments to suppliers by Jack Wolfskin was found.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Production location level approach	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0

**Comment:** At production sites in China, Indonesia and Vietnam payment below the living wages benchmarks that FWF collected from local stakeholders was specifically reported. Jack Wolfskin could show that they are in close contact with these suppliers to find space with them to make incremental improvements on wages. Jack Wolfskin started a project with their Cambodian suppliers, to work step by step to improve the wage situation. Jack Wolfskin has created a questionnaire to discover the special needs of the workers. Jack Wolfskin carefully chose to work closely with their suppliers in Cambodia to make sure that their is willingness of factory management to work on the wage situation.

First results of the survey are in hand and Jack Wolfskin decided to start implementing a breastfeeding room, improve milk nutrition and maternity protection for women. At the moment women had to work one year at the factory to fall under the maternity cover, Jack Wolfskin wants to make sure that women are covered earlier as well.

**Recommendation:** FWF encourages the affiliate to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder and discuss with suppliers about possibilities to work towards higher benchmarks. Jack Wolfskin could proceed with its efforts at one or more main suppliers, where it has a high leverage, to start discussing how to move up the wage ladder towards living wages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

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## PURCHASING PRACTICES

Possible Points: 44

Earned Points: 32

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	98%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	1%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Meets monitoring requirements for tail-end production locations.	Yes	
Total of own production under monitoring	99%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: High knowledgeable staff is designated to follow up on problems identified by Jack Wolfskin's monitoring system.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Comment: Jack Wolfskin conducts frequent audits at its suppliers and monitors follow up closely. Progress of suppliers is generally monitored at least once a year. This is done either by CSR staff or the audit company Sumations, which received training by FWF. In its supplier rating and overview system, reminders pop up on corrective actions that need following up.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: Improvement timelines are established in a timely manner. This counts for FWF audits as well as audits conducted by Sumations teams.

Recommendation: FWF recommends Jack Wolfskin to start handing over the corrective action plans to worker representatives during their meetings.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

**Comment:** Jack Wolfskin conducts frequent audits at its suppliers and monitors follow up closely. Progress of suppliers is generally monitored at least once a year. This is done either by CSR staff or the audit company Sumations, which received training by FWF. In its supplier rating and overview system, reminders pop up on corrective actions that need following up.

It is to highlight that especially at its Vietnamese suppliers Jack Wolfskin could show extensive progress on the corrective actions.

**Recommendation:** It is recommended to involve worker representation where applicable. Documents need to show that meaningful efforts have been made to facilitate resolving similar problems in the rest of the supply chain.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	99%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

**Comment:** Jack Wolfskin merges the corrective action plans of audits implemented by Sumations and FWF, when both are available. Sourcing staff, when visiting potential new suppliers, collect other third party audit reports. CSR staff assesses the quality of these reports. Sumations audits are implemented during the testing phase, before orders are placed and after.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Advanced			6	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2

**Comment:** Turkey: A small amount of Jack Wolfskin's production comes from Turkey where Syrian refugees have become an issue in the labour market recently. The Turkish supplier of Jack Wolfskin responded that Syrian refugees are not employed at the factory (and this was also confirmed during the audit). Nevertheless, Jack Wolfskin has informed them sending relevant documents. Additionally, Jack Wolfskin signed a joint letter that FWF and other organizations wrote to Turkish government in order to get Syrian refugees legalized. An audit in September 2015 concluded that no Syrian refugees are employed at the production site.

China: Freedom of Association is an issue along the supply chain in most of the production countries. Training such as the Workplace Education Programme have been focusing on this matter as a first step.

Italy: A supplier in Italy is monitored carefully to mitigate the risk of Chinese workers in Italian factories - which were not found at Jack Wolfskin's suppliers so far.

Bangladesh: Dialogue with Bangladesh suppliers is shown to be on fire and building safety and all suppliers participated in FWF training on fire and building safety. A training on violence against women prevention was suggested to the supplier but not yet conducted. All suppliers in Bangladesh are either member of the Accord or Alliance. Reports have been collected and improvements needed implemented.

Myanmar: Jack Wolfskin followed FWF's Myanmar policy. Freedom of Association is an issue where Jack Wolfskin together with another FWF affiliates puts high focus on to ensure realization of real and reliable cooperation with unions.

**Recommendation:** Overall/integrated risk for the textile industry is gender discrimination and violence against women. Jack Wolfskin is recommended to expand their efforts including above mentioned risks. Jack Wolfskin is recommended to address not only fire and building safety with suppliers in Bangladesh, but also violence against women.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Jack Wolfskin has shared own audit reports, and has participated in shared FWF audits with other customers. It could show communication on coordinated follow-up of corrective actions at shared suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	Member undertakes additional activities to monitor suppliers	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	2	0

Comment: Jack Wolfskin has below 1% production in low risk countries, mainly Italy and Germany. The production site in Germany is shared with another FWF member brand. Jack Wolfskin has ensured with an audit that the code of labour practice is posted.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits above the minimum required monitoring threshold.	90%+	FWF encourages all of its members to audit/monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	3	3	0

Comment: Jack Wolfskin has monitored 99% of its production volume, which is above the required monitoring threshold.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

Comment: Jack Wolfskin is not working together with licensees. Jack Wolfskin has a subsidiary in China which develops products for the Chinese market. All suppliers used for international and Chinese market are coordinated and organized via the brand's headquarter in Germany.

## MONITORING AND REMEDIATION

Possible Points: 32

Earned Points: 29

### 3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	7	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	2	
Number of worker complaints resolved since last check	5	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 System is in place to check that the Worker Information Sheet is posted in factories.	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	0

Comment: Jack Wolfskin has set up a systematic process to provide documents to manufacturers. Sumations checks during annual monitoring visits whether the CoLP has been posted.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Percentage of FWF-audited production locations where at least half of workers are aware of the FWF worker helpline.	64%	The FWF complaints procedure is a crucial element of verification. If production location based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Production location participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited production locations where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of production locations in WEP programme.	3	4	0

Comment: WEP training carried out at production location's count also towards this indicator. Almost half of Jack Wolfskin's production volume received a WEP training.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	Yes + Preventive steps taken	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	6	6	-2

Comment: Remediation of complaints is in process or completed. Jack Wolfskin immediately reacts upon complaints involving other customers of the production site as well as stakeholders if feasible. To prevent complaints from happening again, the complaint case is integrated into the companies internal country study which is used as a base for upcoming audits and travels.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

## COMPLAINTS HANDLING

Possible Points: 15

Earned Points: 14

## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

**Comment:** Everybody with supplier contact is informed in detail during the supplier evaluation at least twice a year.

Jack Wolfskin has so called brand coaches, that train staff of their stores twice a year. This intensive four day training includes two hours information on FWF.

Upon last year all staff has been informed about FWF through Jack Wolfskin's social report. However this report is missing for last year (see 6.3).

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** All staff working directly on the product and with production sites receive a training on social and environmental standards regularly. Details about FWF's work are explained such as the Code of Labour Practice and how to read an audit report.

Traveling technicians and traveling staff are explicitly trained on the OHS guide and on how to use the FWF OHS checklists. This enables them to perform checks on obvious issues during their visits at the production site. After their return, technicians report back to CSR staff about their findings. In addition, traveling technicians are included in supplier evaluation and rating meetings. They also have to participate once in an audit to know how FWF membership works in detail at the production site.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	2	2	0

Comment: Jack Wolfskin works with a limited number of agents for footwear and t-shirt production. The agents are trained, asked to join audits and to follow-up corrective actions with the factory. In addition they partly participate in FWF training provided to factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Production location participation in Workplace Education Programme (where WEP is offered; by production volume)	43%	Lack of knowledge and skills on best practices related to labour standards is a common issue in production locations. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	4	6	0

Comment: 43% of the suppliers by production volume in countries where FWF offers WEP are trained. Jack Wolfskin, together with another FWF affiliate has shown great effort to include their supplier in Bangladesh into the training program, but the supplier is not willing to participate. The supplier offers own worker training and is hence hesitant to allow training time for FWF.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Production location participation in trainings (where WEP is not offered; by production volume)	31%	In areas where the Workplace Education Programme is not yet offered, member companies may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	3	4	0

**Comment:** Together with three other outdoor brands, Jack Wolfskin has established a training program for management and workers in Myanmar in 2015. The organization SMART has trained all participants. FWF training material was used, country specifics included and everything translated for local use. In addition, a complaints hotline was established by having SMART as a complaints handler and spreading the complaints handler number during training and audits.

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## TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 12

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### Additional comments on Training and Capacity Building:

Jack Wolfskin includes FWF information wherever possible. E.g. during sustainability presentations at the ISPO.

## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

**Comment:** Jack Wolfskin has a supplier information system which includes all suppliers and their subcontractors. A supplier list is publicly available on Jack Wolfskin's website. Jack Wolfskin allows its suppliers to use subcontractors but only after the supplier has the company's permission. This rule is shared with the supplier from the beginning of the business relationship. Subcontractors are visited by traveling staff from Jack Wolfskin and it is policy that subcontractors are audited.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** Different departments have access to suppliers' information.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Information on FWF membership is placed on the website in correct wording. The use of on-product communication is according with FWF's communication policy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Production locations are disclosed to the public	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	2	2	0

Comment: Jack Wolfskin published the last Brand Performance Check on its website, and published its direct supplier list online.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	For new member companies	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	-1	2	-1

Comment: Due to internal capacity issues, Jack Wolfskin has not submitted its social report to FWF.

Requirement: FWF approach requires transparency on Jack Wolfskin's work towards social standards. The social report needs to be submitted to FWF and published on Jack Wolfskin's website.

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## TRANSPARENCY

Possible Points: 6

Earned Points: 3

## 7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: CSR person is in constant contact with management about FWF membership and CSR. Also the head of pricing is closely involved in CSR matters.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

## EVALUATION

Possible Points: 2

Earned Points: 2

## RECOMMENDATIONS TO FWF

1. Jack Wolfskin mentions that FWF should include more brand involvement/perspective in their work, to get also a better understanding of what is really happening at the brands.
2. FWF audit reports are too long and difficult to read. Jack Wolfskin suggests to make them more user friendly by e.g. including a traffic light system with the findings.
3. Currently the verification plan is shared by FWF on an annual basis with the brands at the beginning of the fiscal year. However the fiscal year is not always the same as the financial year of brands. To ensure meeting FWF's monitoring requirements it is hence recommended to FWF to have the verification plans aligned with the brands financial year.
4. It would be helpful to have more detailed information about audits and corrective actions in the database. This counts especially for those findings which are checked explicitly with indicators in the Brand Performance Check (e.g. overtime and wages).

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	32	44
Monitoring and Remediation	29	32
Complaints Handling	14	15
Training and Capacity Building	12	15
Information Management	7	7
Transparency	3	6
Evaluation	2	2
Totals:	99	121

### BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

82

### PERFORMANCE BENCHMARKING CATEGORY

Leader

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

09-02-2018

Conducted by:

Stefanie Santila Karl, Rosan Van Wolveren

Interviews with:

Melanie Kuntzawitz - Head of Vendor Control

Imen Wong - Vice President Global Product Development

Andrea Demant - Accountant Finance