



## BRAND PERFORMANCE CHECK

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GREIFF Mode GmbH & Co.KG

PUBLICATION DATE: OCTOBER 2018

this report covers the evaluation period 01-05-2017 to 30-04-2018

## 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

GREIFF Mode GmbH & Co.KG

Evaluation Period: 01-05-2017 to 30-04-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Bamberg, Germany
Member since:	15-03-2015
Product types:	Workwear, Corporate wear
Production in countries where FWF is active:	Macedonia, Republic of, Romania, Turkey, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Germany, Hungary, Moldova, Morocco, Pakistan, Ukraine
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	85%
Benchmarking score	68
Category	Good

## Summary:

GREIFF has shown progress and met most of FWF's performance requirements. With a monitoring percentage of 85%, GREIFF goes beyond the required 80% after its third year of membership. With 68 points in the Brand Performance Check, FWF places GREIFF in the 'Good' category.

In the third year of FWF-membership, GREIFF increased purchase prices at one of the factories with 100% leverage and made agreements that the increase completely contributes to the wages of the workers. FWF values this and encourages GREIFF to further increase knowledge of the relation between prices related to wages in general and the impact of price increase on the workers in this specific case.

GREIFF has a strong planning process in place and a proactive approach in organising audits and discussing CAP follow up with suppliers.

GREIFF has organised trainings for two suppliers to increase understanding of labour rights as formulated in the FWF Code of Labour Practices and to raise awareness of the possibility for workers to reach out to the FWF worker helpline. For the second year GREIFF cooperates with another FWF member, a production location in Pakistan and an external partner in a project to raise awareness on labour standards.

FWF encourages GREIFF to continue its current progress and to focus on possible solutions for more complex issues like living wage or social dialogue. GREIFF needs to ensure that the communication policy of FWF is interpreted in a correct way in the communication about GREIFF and MyGREIFF.

## 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.	97%	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:** GREIFF has a consistent supplier base with four main suppliers from Bosnia, Ukraine, Morocco and Romania. GREIFF aims to work with small to medium suppliers where it can have a significant leverage. At most of its suppliers, GREIFF has a considerable leverage, giving them the opportunity to influence working conditions.

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.	6%	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.	3	4	0

**Comment:** GREIFF buys less than 2% of the total FOB at several suppliers in high risk countries. GREIFF sources small quantities of specific products like ties and caps from these suppliers to offer their costumers a complete product range.

**Recommendation:** FWF recommends GREIFF to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, GREIFF 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 GREIFF is exposed to and will allow GREIFF to improve working conditions in a more efficient and effective way.

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.	85%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: GREIFF has a the strategy to build long term relations with their suppliers and during this financial year there are business relationships for at least 5 years with 85% of the production locations.

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: There are four new production locations in 2017 in Macedonia and Romania. GREIFF was able to show all four questionnaires which were signed and returned to GREIFF before the first bulk orders were 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.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: GREIFF selected new suppliers in countries where they are already active and have done a risk-analysis as part of their due diligence approach. The four new suppliers this year were from Macedonia and Romania. On an internal file, accesible for all GREIFF colleagues, the CSR manager stored the FWF country studies and other human rights documents.

On factory level GREIFF visits new suppliers before placing bulk orders and discusses labour standards, request existing audit reports and conduct a Health and Safety Check with the FWF Health and Safety checklist. GREIFF selects small and medium production locations where GREIFF has significant leverage. In one of the new factories GREIFF cooperates with another FWF member with regard to audits and CAP remediation. That factory also received training, which was paid by the other FWF member.

GREIFF has not yet integrated labour standards in a concrete and systematic manner in its decision-making process. GREIFF is working on a systematic rating system for the production locations, which they will integrate into the myGREIFF code.

**Recommendation:** FWF recommends GREIFF to systematically match the available knowledge from the country risk studies to the available knowledge per production locations. This knowledge will help GREIFF to compare factories to their own local context and to identify progress through the years in their journey to address and develop prevention and mitigation of risks at that particular location.

FWF encourages GREIFF to combine this with the ambitions of GREIFF to make the transparency tool MyGREIFF more factory-specific to be able to explain their costumers about the situation of the workers in that particular factory (see indicator 4.2).

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	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.	1	2	0

**Comment:** GREIFF has a consistent approach for evaluating CoLP compliance of all production locations. The questionnaires are filled in, the Worker Information Sheets posted and GREIFF visits the factories and discusses labour standards. GREIFF collects audits in a systematic way and discusses and monitors CAP follow up. Furthermore, GREIFF organizes supplier evaluations several times per year with relevant staff to discuss current issues and evaluate supplier progress with regard to CAP follow up. GREIFF is currently developing a grading system for production locations.

**Recommendation:** GREIFF is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Part of the system can show what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

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:** GREIFF has two types of products: Never Out of Stock-items (NOS) and specific products that are being ordered by customers (20%). The catalogs of the NOS- items have a validity of two years and therefore, it does not have a high or low season. GREIFF provides its suppliers a 12-months forecast of its production planning for the NOS products. This planning is based on input from the production locations about their available hours per month per location per production stage. The actual order placement can differ about 20 per cent. Last minute changes are rare.

The lead time for suppliers from Europe and Morocco is 10 weeks. GREIFF buys the fabric and sends it to the factories. For Pakistan and Vietnam lead time is between 16 to 26 weeks, these production locations supply ready-made garments.

GREIFF has a large stock and is capable of responding to clients' demands. This enables GREIFF to accept some degree of delay from the suppliers that supply the NOS-items. For these items, the production status is reconfirmed on a daily basis. Delays of fabric are monitored and handled by GREIFF. It does not influence the lead time for its suppliers.

GREIFF calculates the standard minutes per style and has started to relate it to the production capacity of several of its most important suppliers. GREIFF struggles with worker retention, especially in Eastern Europe where factories have a hard time retaining workers and keeping a stable production force so that the production process is not affected.

**Recommendation:** In the performance check 2017 FWF recommended to do a root cause analysis to worker retention. At some factories retaining workers and keeping a stable production force was and still is an issue. We therefore suggest to include this topic into the root cause assessment to wages lower than living wages (indicator 1.11 of the Brand Performance Check Guide). GREIFF could start for example at the production location where GREIFF is working with another FWF member and an external partner or a production location where GREIFF has a high leverage.

FWF recommends GREIFF to further develop knowledge of the production location capacity of suppliers: based on availability of suppliers' production lines and minutes, and the known distribution per production stage and per month as a base for the in the annual forecast.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** GREIFF has a general insight in which production countries overtime is an issue and for some production countries this relates to retaining workers. In general GREIFF accepts delays in delivery.

The customer demand for the GREIFF Fairtrade collection was too high for the Bosnian supplier that produced these items, as was shown in the 2016 audit. GREIFF has 100% leverage and is aware that this supplier struggles with retaining workers. To decrease overtime and prevent this for the future at that supplier, GREIFF added an extra production locations that were able to produce the Fairtrade collection for GREIFF. This also happened for the launch of the outdoor collection. GREIFF made clear from the beginning to all suppliers involved that this was a one-time, specific order for these particular items.

No cases of excessive overtime were reported in the audits conducted in the financial year 2017-2018. The audit conducted at a Macedonian supplier in 2017 stated that non recorded overtime could not be excluded based on the findings in the audit. In the audit for one of the Romanian supplier there were complaints about the payroll system for overtime.

GREIFF places the orders for costumers with priority before the NOS orders. In case of urgency, GREIFF asks the production facilities to first produce the urgent order and then the NOS orders.

**Recommendation:** FWF recommends GREIFF to continue support to factory management to improve on recording hours and manage overtime. One of the causes for (excessive) overtime mentioned is wages. FWF strongly recommends GREIFF to start discussions about a living wage or about a living wage-project at these factories.

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:** Every year GREIFF will ask their suppliers to send the lowest, average and highest wage they pay to their workers. GREIFF has the policy not to work with suppliers that pay below minimum wage.

Prices are calculated in consideration of the requirement of the „German Fashion“ union. GREIFF negotiates about prices with suppliers considering a basic model. If the legal minimum wage in a country increases, the cost for the articles also increases.

For the suppliers in Bosnia, Ukraine, Romania and Morocco GREIFF showed that they increased CM prices. GREIFF is aware when and how much increase of salary the suppliers are paying their workers. Together with a Romanian supplier GREIFF agreed that the workers will benefit 100% of the increased CM price.

**Recommendation:** For style-level pricing-policy it is required for a member brand to demonstrate at style level that pricing allows enough to pay minimum wages for each product. FWF recommends GREIFF to take a next step and calculate labour costs per style. GREIFF has a long and good relationship with the majority of its suppliers and FWF wage calculation templates could be helpful.

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:** At one Macedonian supplier the payments of the wages were late due to bankruptcy of one of the other costumers. Together with another member brand sourcing at the same factory, and in consultation with FWF, GREIFF directly and actively responded. After this happened, GREIFF monitors payment of wages on a monthly basis.

For the production locations that were audited in this financial year, GREIFF could show that the legal minimum wage were paid. For the Moroccan supplier the audit results showed that for 2 workers no proper documentation was available. For the other workers the calculation of minimum wage was based on 2288 hours (52\*44). None of the workers exceeded 2288 in 2017, which means that workers were not able to achieve the monthly minimum wage on average. GREIFF already actively followed up on this in the CAP.

**Requirement:** FWF requires GREIFF to actively monitor the payment of minimum wages, considering the different systems of payment of the different suppliers and prioritise focus in case of irregularities in CAP follow up.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses 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:** GREIFF analysed the development of wages in the audit reports and is annually asking suppliers to inform them about the wage levels. The project at their Pakistani supplier focuses on more transparency with regard to prices in relation to wages. After last Brand Performance Check GREIFF has contacted their Bosnian production location and increased the CM prices. It was agreed that this increase was 100% benefit for the workers.

**Recommendation:** FWF stimulates GREIFF to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF 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
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: 30

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	78%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	7%	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	85%	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: The GREIFF CSR manager is responsible for monitoring.

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

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: In case GREIFF requests an audit, a GREIFF representative is present when the auditors visit the production location. Audits and CAPS are shared and timelines are established with factory management. Some production locations do not improve everything in the time that is agreed upon. In these cases the CSR manager reminds the factory to continue the improvement. During visits CAP follow up is discussed and pictures of improvement are taken and collected.

After the 2017 Brand Performance Check GREIFF checked whether worker representations were active in the production locations where GREIFF is sourcing from, but did not discover a worker representation at the factories.

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.	Basic	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.	4	8	-2

**Comment:** During the financial year 2017-2018 four Macedonian, a Moroccan and a Romanian suppliers were audited. GREIFF could show how they agreed on follow up actions with regard to the CAPs. At one Romanian supplier there were complaints about the payroll system for overtime and for unions and collective bargaining. GREIFF discussed this with the supplier and has set timelines to improve on these points.

In Pakistan GREIFF is active with a supplier, another FWF member and an external partner to improve compliance with labour standards. The external partner reports about progress on a monthly basis. Results are discussed with the supplier and others involved. GREIFF will continue this project 2018-2019.

**Recommendation:** FWF recommends GREIFF to gain more insight in progress of remediation by structuring and tracking progress in CAP follow up and remediation amongst their suppliers. This could for example happen by grouping suppliers with comparable issues or by coding or tracking how a factories responds on the suggestions of GREIFF with regard to prevention and mitigation of the identified risks.

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.	98%	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	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.	1	3	0

**Comment:** GREIFF collects audit reports from other sources. The quality of an external audit report of a new supplier was not yet assessed with the Audit Quality Assessment tool. GREIFF could not show follow up on the issues identified in that external audit.

**Recommendation:** FWF recommends GREIFF to assess a collected audit report with the Audit Quality Assessment Tool directly after collecting the report, to assure that it can be included in the monitoring threshold and that the audit report has sufficient quality to assure prevention and mitigation of the relevant identified issues.

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	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** GREIFF does not source from Bangladesh and Myanmar and does not make any use of abrasive blasting.

GREIFF has one supplier in Turkey. They informed their agent responsible for this supplier about the FWF policy related to employment of Syrian Refugees. The agent formulated a policy based on the FWF policy and actively approached the production location, where it increased awareness with regard to the different dimensions related to this topic. Syrian refugees are discussed on a regular basis with the supplier. GREIFF requested FWF for a verification audit for the bookyear 2018-2019 at this factory to assure that the policy with regard to Syrian refugees is correctly understood.

With another FWF member and one existing product location in Pakistan GREIFF has a project as part of their German textile partnership activities. Aim of this project is to enhance suppliers' performance with regards to social and environmental standards as well as productivity and quality levels. The supplier receives trainings, workshops and one-on-one coaching and an external party reports about progress with regard to the labour standards in a detailed way with monthly follow up and discussions within the factory.

**Recommendation:** FWF recommends GREIFF to gain more information about the exact area in Istanbul in which the factory is situated as some areas have more Syrian refugees employed and are higher risk areas. As the agent of GREIFF is involved and interested, GREIFF could encourage their Turkish supplier that if a position opens up they can consider employing a Syrian refugee worker. They can discuss with their supplier to cooperate with United Work, a NGO that collects the CVs of Syrian refugees in Turkey. GREIFF could discuss what support they can offer when Syrian workers are employed. This support could consist of covering the costs of work permits and supporting HR where needed. Please note that the Syrian refugee guidance will be updated later this year.

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: There is cooperation between GREIFF and other FWF members in Pakistan and Macedonia. In Pakistan the two FWF members cooperate in a project with their supplier and an external partner.

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.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	1	2	0

Comment: There are two suppliers in low risk countries, in Germany and in Hungary. The questionnaire is received, the Code of Labour Practice is posted and GREIFF regulary visits them.

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.	Not applicable	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.	N/A	3	0

Comment: GREIFF has 85% of their supply chain monitored, including other audits that are collected. At their Pakistani supplier they have a project together with another FWF member. That supplier used to have SA 8000 but the certification period expired end 2017. Social compliance is monitored on a monthly basis in that project. This supplier is included in the monitoring threshold based on the SA 8000 certification and due to the fact that it is included in the performance checks of other brands. Next year, when the SA 8000 certification is not available, FWF will request a detailed review of the monthly reports of the external partner in the project and the monitoring and follow up by GREIFF and the factory.

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.	Yes	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.	1	2	0

Comment: GREIFF has an outlet in Bamberg where 154 external brands are sold. The questionnaires are sent to all these external brands. There are 57 signed questionnaires returned from external brands, together they contribute to 64% of the total external sales volume.

Recommendation: FWF recommends GREIFF to collect the signed questionnaires from all external brands.

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).	5%	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.	1	3	0

Comment: From the external brands resold there are two FWF members and one FLA member.

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

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## MONITORING AND REMEDIATION

Possible Points: 34

Earned Points: 23

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### 3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	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	0	
Number of worker complaints resolved since last check	1	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of 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

Comment: The CEO and the CSR manager are both involved in complaint handling.

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: GREIFF is systematically checking whether the Worker Information Sheet is posted during visits and pictures are taken. The CSR managers also asks suppliers to send pictures of a posted Code of Labour Practices.

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.	33%	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.	2	4	0

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	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.	3	6	-2

**Comment:** In March 2017 (financial year 26-2017) there was a complaint at the Moroccan supplier about not giving breast-feeding time, disciplining workers, social security not being paid in full and double book-keeping. After the investigation of the FWF team, there was an audit in July followed by a two days training from an external partner about the FWF Code of Labour Practice. GREIFF did not contact other customers of the Moroccan factory to work together on improvements.

After the training GREIFF noticed a difference in attitude from the factory management to the workers, which is helpful for GREIFF to discuss progress and follow-up actions from the factory.

**Recommendation:** At the Moroccan factory, FWF recommends GREIFF to gain insight how pricing policy is related tot wages and payment of social security.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the 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.	N/A	2	0

## COMPLAINTS HANDLING

Possible Points: 13

Earned Points: 8

## 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: GREIFF has a CSR brochure available for staff and customers, which can be found on different places in the Bamberg office. In addition to this, the CSR manager sends an information email and there is communication through the internet.

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: For all employees with a constant contact to suppliers information about Fair Wear Foundation is available on file. Regular meetings are held between CSR, Disposition, Technical Manager, Head of Purchasing and Management. GREIFF participates in FWF seminars, FWF webinars, FWF stakeholder meetings and the FWF annual conference.

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:** All contractors/agents are informed and updated about the membership at Fair Wear Foundation and the Code of Labour Practices. GREIFF is in close contact with them and work together with the contractors/agents on CAP follow up. In addition to this, the contractor/agents also regularly check whether the CoLP is posted in the 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)	2%	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.	1	6	0

**Recommendation:** In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. FWF currently offers the following training modules for the WEP: Basic, Communication, Gender Based Violence, Supervisor and the Factory Guide. More info on availability in countries can be found on the FWF website. GREIFF should motivate its main supplier(s) to join WEP trainings.

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)	33%	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:** GREIFF organized a training in Bosnia and in Morocco where it trained management and workers.

The audit at the Moroccan supplier was after a training in the factory, initiated by GREIFF and executed by an external party. The topic of the training was the FWF Code of Labour Practice and Complaint Procedure. GREIFF compared the audit results to the audit in 2015 at the same location and identified several improvements. In addition to this, points for remediation in the 2018 audit were identified and discussed with the factory.

**Recommendation:** All factory workers and management should be informed about FWF, labour standards and grievance mechanisms. In order to further communication between employers and workers in the workplace FWF recommends GREIFF to ensure suppliers participate in trainings. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participation should be balanced and representative.

Furthermore FWF encourages GREIFF to systematically role out the training program it started in 2016 with their Bosnian and in 2017 with their Moroccan supplier.

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## TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 9

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## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	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.	3	6	-2

**Comment:** GREIFF is well aware of first year suppliers and has one subcontractor listed in the factory overview of the financial year 2017-2018. In last years Brand Performance Check GREIFF received a requirement to include the subcontractors which are mentioned in the audits reports. Based on this requirement the technical manager of GREIFF checked at the companies whether the production for GREIFF was done by subcontractors. The information GREIFF received back was that for their production year 2017-2018 no subcontractors were used. In the financial administration no reference to the subcontractors could be found. However it was also discussed that it is difficult to prove in case something is not happening.

**Recommendation:** To minimize unknown risks on violations of labour rights and to strengthen their own due diligence process FWF strongly recommends GREIFF to specifically contact the relevant factories that have mentioned that there are subcontractors active in audit reports/questionnaires. GREIFF can mention the names of the subcontractors and ask whether there is some production at these subcontractors or not and gain insight in the reasons why. In addition to this, FWF recommends GREIFF to let their agents/production locations know how relevant it is to know with regard to prevention and mitigation of risks and to systematically store the response of the brand to collect proof.

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:** There are regular meetings between management, CSR, Disposition, Head of Purchasing and the Technical manager in which GREIFFs progress on improving working conditions at the production locations is discussed.

Important events and information is exchanged among the head of departments in a weekly meeting. The material on working conditions, including the CAPs of factories is available for all staff.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

## 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:** Greiff communicates about FWF on its website, in tenders and to its customers. On the MyGREIFF website, in the online and printed version of the CSR Brochure there was one unclarity found about audits "completed by Fair Wear Foundation". After the Brand Performance Check the CSR manager has changed the text on the website.

**Recommendation:** The text about audits completed by Fair Wear Foundation should be removed from the online and offline communication.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Performance Checks, Audits, and other efforts lead to increased transparency	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.	1	2	0

**Comment:** GREIFF is transparent through MyGREIFF in which production countries a style is produced and even shares photo's of the factories. In addition to this, GREIFF publishes their social report.

**Recommendation:** The MyGREIFF transparency tool, gives GREIFF a platform to communicate to their costumers about (living) wages in that specific production location.

FWF recommends GREIFF to publish the Brand Performance Checks on the company website.

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

Comment: GREIFF has submitted their social report and it will be placed on the website.

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## TRANSPARENCY

Possible Points: 6

Earned Points: 5

## 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: The CSR manager is in close contact with top management. There is active involvement from the CEO in FWF membership in general, the actions taken after the Brand Performance Check last year and complaint handling.

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.	50%	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.	4	4	-2

Comment: There was one requirement about indicator 5.1. The CSR manager of GREIFF could show communication that there was follow up on this, however this could not be proven with documentation.

Recommendation: FWF recommends GREIFF to document the follow up on requirements.

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## EVALUATION

Possible Points: 6

Earned Points: 6

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## RECOMMENDATIONS TO FWF

For GREIFF as a brand Central Europe is more important than the Far East. It would help a lot to have more FWF countries, like Bosnia and Serbia. For many German brands these countries will become more important. In case there are new country studies or other materials available, please share in the member update that they are available.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	30	44
Monitoring and Remediation	23	34
Complaints Handling	8	13
Training and Capacity Building	9	15
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	85	125

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

68

PERFORMANCE BENCHMARKING CATEGORY

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

26-09-2018

Conducted by:

Mariette van Amstel

Interviews with:

Hans-Peter Beck - CEO

Nicole Wagner - CSR Manager

Jürgen Lützelberger - Head of Purchasing, Product Management and Marketing

Robert Pröll - Technical manager

Sabine Sahliger, Chief Financial Officer