



# **Brand Performance Check**

## **Jack Wolfskin**

This report covers the evaluation period 01-01-2021 to 31-12-2021

## About the Brand Performance Check

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

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

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

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

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

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

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

# Brand Performance Check Overview

## Jack Wolfskin

Evaluation Period: 01-01-2021 to 31-12-2021

Member company information	
Headquarters:	Idstein , Germany
Member since:	2010-06-30
Product types:	Outdoor products; Sports & activewear; Bags; Accessories; Outdoorwear; Footwear; Luggage & other travel accessories
Production in countries where Fair Wear is active:	Bangladesh, China, Indonesia, Myanmar, Turkey, Viet Nam
Production in other countries:	Cambodia, Germany, Italy, Republic of Korea, 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	83%
Benchmarking score	78
Category	Leader

## Summary:

Jack Wolfskin has shown progress and met most of Fair Wears' performance requirements. The member brand has a benchmarking score of 78 and has monitored factories accounting for 83% of the total production volume. The monitoring threshold does not determine the category this year due to the limited audit possibilities during the COVID-19 pandemic. With a benchmarking score of 78, Fair Wear has awarded Jack Wolfskin the status 'Leader'.

## Corona Addendum:

Jack Wolfskin has a strong and systematic system in place for human rights due diligence and monitoring of its supply chain. During COVID-19, Jack Wolfskin adequately mitigated and remediated risks and no unilateral decisions regarding orders were taken by the company. The COVID-19 crisis has had a severe impact on Jack Wolfskin's operations, especially in 2020. In 2021 the company dealt with the consequences of the pandemic and focused on recovering. Meanwhile, Jack Wolfskin continued monitoring all suppliers and maintained regular contact with its suppliers by email, phone and with the support of local teams. There was frequent exchange of information with other Fair Wear members to coordinate efforts and remediate issues collaboratively where possible.

Under normal circumstances, Jack Wolfskin audits between 90 and 100% of its suppliers. Due to limited audit possibilities in 2021, it has conducted fewer audits but used alternative monitoring tools. The local teams in China and Viet Nam were trained by the CSR team to act in the monitoring process on site. Jack Wolfskin used a questionnaire created in collaboration with other Fair Wear members to gather information from its suppliers on the COVID-19 situation.

The main risk identified by Jack Wolfskin in this second pandemic year was the consequences of factory lockdowns on workers' income and labour rights. The member brand was in constant dialogue with its suppliers to monitor this. In case of capacity issues and production delays, Jack Wolfskin adapted its planning and accepted all late deliveries without penalties. There were no cancellations of orders.

Jack Wolfskin was aware of the high risk of the 3-on-site scheme in the southern region of Viet Nam and flagged the issue very early. The member monitored payment of at least legal minimum wage for all workers. The member brand collected workers' wage overviews and wage slips to verify this.

In 2021, there were several audit findings and complaints related to wages, and Jack Wolfskin has shown proper follow-up and remediation efforts. Root causes have been discussed with the relevant suppliers, yet possibilities of dialogue were limited as the CSR team could not meet in person.

Activities such as increasing wage levels have shown less progress due to the company's focus on recovering from the COVID-19 crisis. Fair Wear recommends Jack Wolfskin to ensure it has enough capacity in CSR to work on projects such as increasing wages. Jack Wolfskin is encouraged to take significant steps and arrange meetings with suppliers related explicitly to living wage, for example, setting target wages to work towards higher wages in each production country.

## Performance Category Overview

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

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

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

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

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

# 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	67%	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.	3	4	0

**Comment:** In 2021, Jack Wolfskin had at least 10% leverage at production locations that account for 67% of the brand's total production volume. Compared to 2020 when it was 60%, this percentage slightly increased.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	21%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

**Comment:** A total of 21% of production volume comes from suppliers where Jack Wolfskin buys less than 2% of its total production volume. This is a consolidation compared to the previous financial year. The tail-end mainly exists due to the great variety of products in its catalogue. For example, several (highly specialized) products are ordered only in small quantities. Jack Wolfskin indicates that this is part of the type of business and considers its tail-end suppliers the same as the larger suppliers in its monitoring system.

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.	58%	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:** In 2021, the brand bought 58% of its production volume from suppliers where a business relationship has existed for at least five years. This is similar to the percentage in the previous financial year. Jack Wolfskin aims to maintain a stable supply chain and values long-term relationships with suppliers. This does not only apply to its tier one suppliers; the brand also works directly with nominated material suppliers. Moreover, the brand does not start cooperation with new suppliers for the short term. In some cases, Jack Wolfskin might opt to integrate new suppliers if technical specifications of a product require it or it places orders with new production locations operated by suppliers with an existing business relationship.

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:** Jack Wolfskin added four new production locations to its supply chain. All locations have signed and returned the questionnaire with the Fair Wear Code of Labour Practises (CoLP).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

**Comment:** Jack Wolfskin follows a thorough due diligence process when selecting new production locations. The sourcing team first evaluates the technical capacity of a supplier and often visits the site at an early stage. In this case, staff also uses the Fair Wear health and safety checklist.

Before a trial order, Jack Wolfskin requests the production location to return the signed questionnaire, including the CoLP, and conducts a social audit. In 2021, Jack Wolfskin had to rely on existing audit reports, as audit options were limited due to COVID-19. Therefore, the company has been hesitant to add new suppliers. For two new suppliers, Jack Wolfskin initiated a 'blended audit' by Sumations and factory visits by the other two were visited by local team members and audits reports have been collected.

Jack Wolfskin conducts an annual risk assessment in each production country. The information in this assessment is based on relevant country information, Fair Wear guidance documents, and followed webinars. The risk assessment is linked to the evaluation of suppliers using a supplier evaluation form. To remain up-to-date on the working conditions at the existing suppliers, the brand intensified its contact with suppliers and continued to conduct blended audits (combination online/offline). Also, for China and Viet Nam Jack Wolfskin could use local teams from the mother group Callaway. Several factory visits took place on Jack Wolfskin's behalf, and clear feedback was reported.

Since the start of the COVID-19 pandemic in 2020, Jack Wolfskin has kept itself informed on the impact of COVID-19 on its production countries and locations through various channels. Jack Wolfskin was in regular contact with all suppliers by mail and phone. The company regularly exchanged information with other Fair Wear members, used Fair Wear guidance and consulted its local teams in China and Viet Nam. Generally, Jack Wolfskin has a strong due diligence system and is aware of the risks in its production countries. In 2021, Jack Wolfskin focused on 3 onsite and wage payments (see indicator 1.9), it could show that the CSR team is on top of this and monitors this thoroughly. Furthermore, factory lockdowns, infections and production delays have been part of the monitoring at the supplier level. Jack Wolfskin could show a clear overview per supplier.

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 conducts a formal supplier evaluation after each season (twice a year) and includes the progress over different years. Suppliers are rated based on a traffic light system in several categories, including social compliance. The social performance rating is based mainly on the results of the most recent social audit. Jack Wolfskin highlights Fair Wear's approach to continuous improvement and communicates that lack of compliance can lead to the discontinuation of business in severe cases.

The results of the supplier evaluation are shared with suppliers. Suppliers with a low score on Jack Wolfskin's human rights due diligence standard are offered support to remediate non-compliance. The review is also used for future sourcing decisions. Whether it is possible to increase orders also depends on the necessary production capacity and the supplier's production capacity. With this system, Jack Wolfskin aims to align business decisions and social performance as much as possible.

In 2021, the company was in regular dialogue with all suppliers and was flexible when needed to support suppliers. For instance, in case of production and delivery delays, Jack Wolfskin adapted its production planning and accepted all late deliveries without penalising factories.

Thirteen production locations were phased out in 2021. The majority was on subcontracting level, because of business decisions at the main supplier level. For each of the ended business relationships, the responsible exit strategy did not apply as this was a unilateral decision by the supplier. Jack Wolfskin checked well in advance whether the phase-out would lead to any capacity problem for the workers, but none of the suppliers indicated that this was the case.

In cases of COVID-19 at the factory level, the Senior Head of Social Compliance and Sustainability proactively followed up to learn what support was given to the workers and what safety measures the factory had in place to prevent the further spread of the virus.

Jack Wolfskin did not take any unilateral decisions regarding the cancellation of orders during the pandemic in 2021.

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 has a robust and elaborate planning system in place that supports reasonable working hours at the production locations.

Suppliers receive initial information about planned orders at least nine months in advance (range fixing). The suppliers then provide feedback on the proposed timeline. In many cases, timelines have already been established in previous seasons and hence allow a level of predictability for the supplier. Suppliers are asked to plan production based on an eight-hour work day. Occasions such as Ramadan and Chinese New Year are also taken into account.

A first capacity forecast is shared in November for orders due between May and August (bulk production). At that time, Jack Wolfskin also blocks capacity at material suppliers. Orders are then placed iteratively, and forecasts are adjusted weekly. Additionally, Jack Wolfskin places pre-orders for carry-over styles to alleviate pressure during peak production times. The brand has local staff in China and Viet Nam for quality control and production development to improve production flows.

In 2021, it was challenging to stick to the agreed production planning, as Jack Wolfskin's supply chain was severely disrupted due to the pandemic. Materials and/or manufacturing were often delayed, and adjustments had to be made. This was done in close dialogue with the suppliers, and Jack Wolfskin accepted all later deliveries without penalising its factories. Moreover, the brand started to book capacity and raw materials even more in advance and worked closely with the sales department to forecast its purchase orders. Air freight was in several cases used, and the costs were fully covered by Jack Wolfskin.

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:** Even though Jack Wolfskin's production planning system supports reasonable working hours, excessive overtime still occurs at its production locations.

Preventive measures include in advance capacity and raw material planning and having discussions with suppliers on root causes of excessive overtime. Also, it is discussed with the factories that production planning should be based on eight hours per day without overtime. Progress is monitored in annual audits.

In 2021, Fair Wear conducted four audits, and overtime issues were found at three of those; two suppliers in China and one in Bangladesh. Jack Wolfskin could show that follow-up was done (see indicator 2.4). The limitations due to COVID-19 made it challenging to discuss and mitigate root causes. Still, the local teams in China and Bangladesh (via Jack Wolfskin's mother company Callaway) were used in this process. There was frequent contact between Jack Wolfskin's CSR staff and the local teams in the production countries to discuss social compliance and to train the local teams for visual inspection regarding planning and capacity. Examples: checking electricity use per day, items on the production lines, and the energy among workers.

Other preventive measures to mitigate excessive overtime include early capacity and raw material planning and requiring suppliers to base production planning on eight hours per day without overtime.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

**Comment:** Jack Wolfskin conducts detailed cost calculations per style that include material, supplier margins, and Cut Make Trim (CMT) costs. The company does not have insights into the exact cost of labour, since labour cost per garment is included in the CMT package and not specified. For 2020, Jack Wolfskin had planned to further deepen its understanding of the link between its buying prices and wage levels in the factory by working together with another Fair Wear brand. However, because of COVID-19, these plans were put on hold. For 2021, this is still the case.

Jack Wolfskin's sourcing staff is actively informed about recent wage levels, target wage increases, and changes in legal minimum wage and considers this during price negotiations. Sourcing staff is also authorised to make product engineering decisions, which means adjusting designs based on supplier feedback to ensure certain price limits are not exceeded. Also, CSR staff is in close dialogue with sourcing staff to ensure wages are considered in the prices, in case of a legal minimum wage increase, for example.

During audits in 2021, four suppliers indicated that prices of Jack Wolfskin are considered not enough to support payment of living wage were reported in four audits. Jack Wolfskin showed it has good insight into the topic of living wage and made a thorough analysis of price levels compared to regional and living wage levels, but for some of its production countries, credible wage estimates are lacking. Similar to the previous year, Jack Wolfskin continued to discuss this with suppliers, but given the delicacy of this topic, it is difficult to bring this topic up in a virtual meeting and aims to more effectively discuss this during factory visits in the next year.

Jack Wolfskin is well aware of the additional costs made by suppliers because of COVID-19, especially at its main suppliers. The additional costs were partly absorbed by Jack Wolfskin through open discussions on pricing, while the brand could not always increase its retail prices of the products.

**Recommendation:** Fair Wear recommends Jack Wolfskin to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices, for example by using the FairPrice app. The FairPrice app also enables suppliers to include any COVID-19 related costs. Jack Wolfskin could consider offering training by a local representative on FairPrice to its suppliers. Such training is available in all Fair Wear countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

**Comment:** In 2021, there were no findings on payment below the legal minimum wage. However, there were several audit findings on other legal wage elements, mostly related to bonuses and social security. Jack Wolfskin could show follow-up of these findings with updated CAPs and email communication containing evidence of corrective actions.

Jack Wolfskin was aware of the high risk of non-payment of legal minimum wage at its Vietnamese suppliers. The member monitored payment of legal minimum wages to workers at factories during lockdowns, as well as to workers who did not want to participate in the 3-on-site scheme and instead stayed home - this was the case at two suppliers in Viet Nam. Jack Wolfskin discussed this with its suppliers, collected overviews of wages and samples of wage slips, and it used audit findings. Jack Wolfskin indicated that it was difficult to properly monitor the payment to workers that did not participate in the 3-on-site scheme as provided information on government support was difficult to verify.

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:** Jack Wolfskin has written payment term agreements with suppliers ranging from 7 to 45 days.

The big delays in material supply, made several suppliers request a prepayment to Jack Wolfskin. This was accepted and done.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Insufficient	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	0	6	0

**Comment:** Jack Wolfskin has made an in-depth analysis of wage levels in 2019. This overview was kept up to date, comparing wage levels per factory with living wage benchmarks and legal minimum wage.

In Viet Nam, the company monitored wage payment under the 3-on-site scheme to ensure that at least the legal minimum wage was paid (see 1.9).

Furthermore, Jack Wolfskin updated the wage information of each supplier to ensure a good understanding of wage levels. Discussions with suppliers related explicitly to living wage did not take place in 2021 due to COVID-19.

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	6	0

**Comment:** As explained under indicator 1.8, Jack Wolfskin cannot yet fully demonstrate the link between its buying price and wage levels.

However, the member brand did conduct a wage analysis for its suppliers in Viet Nam. Jack Wolfskin decided to focus on Viet Nam because of the higher risk of 3-on-site. The study showed that at least two of its Viet Nameese suppliers are above the Living Wage benchmark according to the Ankor method. These two suppliers are good for 6% of Jack Wolfskin's total FOB.

Due to the impact of COVID-19, Jack Wolfskin did not implement a new target wag in 2021. The company also did not develop its strategy to finance wage increases further.

**Recommendation:** Fair Wear recommends Jack Wolfskin to determine target wages that meet or exceed estimates recommended by Fair Wear in its Living Wage policy. In determining what is needed and how wages should be increased, it is recommended to involve worker representation and suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	6%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	2	6	0

**Comment:** In 2022, Jack Wolfskin updated the wage information of its Viet Nameese suppliers and it showed that wages at two suppliers are above the living wage benchmark according to the Ankor method. These two suppliers account for 6% of the total FOB.

**Recommendation:** We encourage Jack Wolfskin to show that discussions and plans for wage increases have resulted in the payment of a target wage.

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## **Purchasing Practices**

**Possible Points: 52**

**Earned Points: 30**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	80%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0.2%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	83%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** Jack Wolfskin's Senior Head of Social Compliance and Sustainability is responsible for following up on problems identified by its monitoring system. The CSR team consists of four team members, and the local team in China has become more involved in follow-up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Yes	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	0	0	-1

**Comment:** Jack Wolfskin uses Fair Wear audits and audits by its monitoring partner Sumations. Jack Wolfskin's Senior Head of Social Compliance and Sustainability is closely involved in the audit process.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** Jack Wolfskin shares corrective action plans with suppliers and worker representatives when possible. Improvement timelines are established in a timely manner. Worker representatives are included in the closing meetings (where corrective actions are discussed) but do not systematically receive a copy of the corrective action plan.

**Recommendation:** In the countries where Jack Wolfskin has local staff, the brand is recommended to investigate if local staff can support the brand's engagement with worker representation. That way, allowing the brand to include worker representation in following up on audit findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

**Comment:** Jack Wolfskin conducts annual audits at most production locations and systematically monitors the follow-up. High-urgency issues are prioritised, and progress on corrective action plans (CAPs) is monitored by means of a traffic light system. Depending on the issue, follow-up may include asking suppliers for status updates, including collecting evidence of improvements, factory visits by staff/local team or the monitoring partner Sumations. Jack Wolfskin's supplier rating and internal monitoring system include automatic reminders of unresolved corrective actions. When possible, Jack Wolfskin arranges training at the factory to address more complex issues, such as worker awareness. Worker representation is not systematically involved in the follow-up of CAPs.

During the pandemic, as visits to the factories were limited due to travel restrictions, Jack Wolfskin regularly used questionnaires to gather information from its suppliers and requested local teams to visit factories in order to keep monitoring the situation on the premises. Training possibilities were limited due to COVID-19.

During the performance check, Jack Wolfskin showed that it systematically tracks active CAPs. A sample of CAPs has been reviewed, and improvements have been implemented in each of the CAPs. The Senior Head of Social Compliance and Sustainability has a clear insight into CAP status and is in direct contact with suppliers. An extended CAP with flagged questions and verified notifications is used to close monitor status and progress per supplier.

One critical audit finding in 2020 at a factory in Bangladesh where other Fair Wear brands are also sourcing. It was decided to organise a Sumations audit end of 2021. More serious issues were found, and the brands immediately organised a call with supplier and production staff. Jack Wolfskin showed a proactive response, and top management was involved to underline the seriousness of the issues. In order to verify the actions taken, a verification audit is planned for 2022.

CAP issues are only closed after verification of remediation, either through Fair Wear audits or Sumations audits. Jack Wolfskin relies on CAP exchange for follow-up, and findings are marked with colour codes to categorise the level and status of issues.

**Recommendation:** Fair Wear recommends Jack Wolfskin to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings. For example, the brand could start in the production countries where it already has local staff to overcome the language barrier.

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.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2020 for all Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	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.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Advanced			6	6	-2
Compliance with FWF guidance on abrasive blasting	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	Advanced			6	6	-2

### **Comment:** Bangladesh

Jack Wolfskin works with three Bangladeshi suppliers, accounting for 22% of its total production volume in 2021. All of Jack Wolfskin's production locations in Bangladesh have been audited by the International Accord. Jack Wolfskin mentioned that follow-up of Accord audits become more challenging as the system has changed.

All suppliers received training by Fair Wear on fire and building safety, and after vast consideration, Jack Wolfskin has decided to start the onboarding process to become an Accord member. The member brand believes that factories themselves should safeguard building safety. However, it does see the value of membership to underline its brand responsibility. Membership will most likely start in 2022.

Concerning the promotion of gender equality and prevention of gender-based violence, one of the Bangladeshi suppliers has an active worker committee in place supporting gender equality. Each production line at this factory has a designated female worker for complaints. During meetings, Jack Wolfskin continues to discuss this topic with the local Fair Wear team and suppliers.

### Myanmar

Jack Wolfskin sources at two production locations in Myanmar, accounting for 10% of the total production volume. One was added in 2014, the other in 2018. Jack Wolfskin could show that it has implemented the monitoring requirements established by Fair Wear for production in Myanmar. Jack Wolfskin's CSR team closely monitored the situation around the military coup in 2021.

In cooperation with other Fair Wear members, Jack Wolfskin actively worked on addressing complaints and audit findings. Jack Wolfskin has published aggregated audit results of Myanmar production locations on its website and shares information on wage levels in its social report. As factory visits were limited in 2021, Jack Wolfskin used alternative monitoring tools. The company is in frequent contact with its suppliers and uses the questionnaire to gather country specific information, as well as information related to the military coup.

### Turkey

Jack Wolfskin sources at two factories in Turkey, accounting for 2% of the total production volume. The suppliers are informed about possible labour rights violations linked to employing Syrian refugees. Both factories were audited in 2020 (one external audit and one Fair Wear audit), and neither detected the employment of Syrian refugees.

## COVID-19

Similar to the previous pandemic year, Jack Wolfskin kept itself informed on the impact of COVID-19 in its sourcing countries. The member had frequent contact with all suppliers, exchanged with other Fair Wear members and consulted FW guidance and other relevant initiatives. The local team in China was able to monitor the situation on-site. In Viet Nam, Jack Wolfskin identified as the main risk the 3-on-site scheme, through which factories could keep production going while there was a strict lockdown. Viet Nam is an important sourcing country for Jack Wolfskin, from which it sources 25% of its total production volume. Jack Wolfskin flagged the risk of the 3-on-site scheme already in a very early stage and followed Fair Wear's requirements regarding legal minimum wage. To avoid double work for the suppliers and join efforts, Jack Wolfskin collaborated closely with other Fair Wear members to mitigate the risks of 3-on-site during COVID-19. The group of brands developed a questionnaire and an information sheet to get insight into the factory wage situation.

In the other sourcing countries, Jack Wolfskin focused on monitoring the consequences of factory lockdowns for workers' income and production delays due to lower capacity because of COVID-19 measures in the factory. Late deliveries were all accepted without penalising its suppliers. Health and safety measures had become routine and needed less attention.

## Other risks

Jack Wolfskin is well-aware of the other risks related to its production countries and has regular discussions with suppliers. For example, in Cambodia, the brand has defined women's health and gender discrimination as high risks. In conversations with suppliers, the brand discusses how the factories ensure healthy and safe working conditions for workers and ensures there is no discrimination against pregnant women. For China, excessive overtime, non-payment of social insurance, and wage calculation models are high risks. These topics are usually discussed during in-person meetings, which were in 2021 limited. The CSR team frequently informs production staff about these risks, and feedback is shared during factory visits.

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 proactively works together with other Fair Wear member brands. It shares audit reports conducted by its monitoring partner with other Fair Wear members and has participated in Fair Wear audits at production locations shared with other Fair Wear member brands. In collaborating with other brands on CAP follow-up, Jack Wolfskin prefers to divide the effort among the brands with information and learnings exchanged on a regular basis instead of selecting one brand to take the lead. According to Jack Wolfskin, this might cause a lack of commitment from the other brands and a weaker signal towards the supplier at stake. This is, however, difficult to implement in practice.

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.	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. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

**Member undertakes additional activities to monitor suppliers.:** Yes (1)

**Comment:** Jack Wolfskin sources from three suppliers in low-risk countries, located in Slovenia and Germany. Monitoring requirements were fulfilled for both sites. In addition, Jack Wolfskin conducted full social audits at some of these production locations. By 2021, Italy is not considered a low-risk country anymore, and full monitoring requirements have been met for all three production locations in Italy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	Yes	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	2	2	0

**Comment:** Jack Wolfskin has monitored 83% of its supply chain, including conducting audits at several tail-end production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

## Monitoring and Remediation

**Possible Points: 23**

**Earned Points: 22**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	5	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	1	
Number of worker complaints resolved since last check.	6	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** The Senior Head of Compliance and Sustainability has been designated to follow up on worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

**Comment:** Jack Wolfskin has set up a systematic process to provide the Fair Wear Worker Information Sheet (WIS) to suppliers. Normally, its monitoring partner and staff visiting suppliers check if the CoLP has been posted.

In 2021, Jack Wolfskin conducted fewer audits for obvious reasons. In China and Viet Nam, local teams from Callaway Group verified the posting of the WIS upon request, and in Cambodia, a head office colleague was present to verify accurate posting and correctness of the sheets.

In 2021, some cases of old posters were found, and Jack Wolfskin could show proper response and proof that this was followed up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	7%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

**Comment:** In total, five production locations of Jack Wolfskin completed Fair Wear's Workplace Education Programme Basic module in the past three financial years, and one factory participated in a Better Work training on OHS. In addition, the Fair Wear worker rights videos were shared at two production locations in Turkey. This accounts for 14 % of Jack Wolfskin's production volume.

Because of COVID-19 restrictions in 2021 that limited the possibility of conducting training, this indicator is considered not applicable in this check.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes + Preventive steps taken	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	6	6	-2

**Comment:** In 2021, five complaints were received. Reports on each complaint are available on Fair Wear's website. Jack Wolfskin always takes immediate action and has shown proactive follow-up on all complaints received.

One complaint in Myanmar was related to verbal abuse, and Jack Wolfskin followed up with the factory immediately. The issue was discussed with factory management. A survey among workers was conducted to understand the scale of this issue, and the accused party was trained on behavioural attitude.

In several cases, complainants could not be reached to verify remediation. However, Jack Wolfskin showed in each of the cases a proactive response and discussed prevention and root causes with the relevant suppliers, offering WEP training and highlighting the importance of a solid complaints mechanism for example.

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 Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

**Comment:** All complaints were at suppliers that are shared with other member brands. Jack Wolfskin cooperated actively with these brands in all cases.

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## Complaints Handling

**Possible Points: 17**

**Earned Points: 15**

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## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** Jack Wolfskin has made Fair Wear membership part of the introduction program for all new staff. Staff working in Jack Wolfskin stores is trained twice a year. Their training includes two hours of information on Fair Wear. Like the previous year, Jack Wolfskin organised training online due to COVID-19.

The CSR team attended several meetings with the media in 2021 to share social and environmental efforts, primarily through interviews and podcasts.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

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

The CSR team organized online meetings with local Quality Control staff to explain more about social compliance and CAP follow-up. QC staff will join audits in the next financial year to learn more about auditing and remediation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	26%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

**Comment:** Four production locations (in Viet Nam and Myanmar) participated in Fair Wear's WEP Communication module in the past three years, which is lower than in most other years due to COVID-19.- Another five production locations were part of the ILO Better Work programme.

All training together accounts for 26% of Jack Wolfskin's total production volume.

**Recommendation:** Fair Wear recommends Jack Wolfskin continue implementing training programmes that support factory-level transformation, such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural and structural change to improve working conditions. To this end, Jack Wolfskin can use Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

**Comment:** Generally, Jack Wolfskin actively follows up on all training. Non-compliances mentioned in training reports are integrated into the existing CAPs and followed up as part of normal CAP follow-up and remediation. In the past two years, Jack WOLfskin was not able to implement training programmes due to the pandemic therefore this indicator is not applicable.

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## **Training and Capacity Building**

**Possible Points: 11**

**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.	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 that includes all suppliers and subcontractors. Jack Wolfskin allows its suppliers to use subcontractors only after the supplier has the company's permission. Jack Wolfskin has made efforts to identify and monitor subcontractors further down the supply chain with its tier one suppliers through a programme of the Sustainable Apparel Coalition (SAC). In 2020, one audit showed that two subcontractors were not correctly authorized. A verification audit by Fair Wear in 2021 showed improvement in this finding. As a preventive measure, Jack Wolfskin added an extra cross-check step to the process; local teams check products on each production line to verify if this corresponds with planning and agreements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** The Senior Head of Social Compliance and Sustainability regularly shares information about suppliers, social performance and audit results. With the onboarding to the Callaway Group, the social compliance processes have become even more important, as the mother company prioritizes this strongly. CSR team of Jack Wolfskin and Callaway Group frequently exchange information, and share learnings and these teams are both part of the Callaway Sustainability Working Group. Local teams are shared, and forces are bundled wherever possible. Suppliers' overall performance, including social is evaluated twice per year, and this is also shared with all relevant staff, including top management.

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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	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Fair Wear membership is communicated in compliance with Fair Wear's communication policy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	2	2	0

**Comment:** Jack Wolfskin published last year's Brand Performance Check on its website and a list of direct suppliers. In addition, the brand has opted-in to the Fair Wear transparency policy and it has disclosed 100 % of its supply chain both to the members in FairForce and on the Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

**Comment:** Jack Wolfskin has submitted a social report on its last financial year to Fair Wear. The social report has been published on the company's website.

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## **Transparency**

**Possible Points: 6**

**Earned Points: 6**

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## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The Senior Head of Social Compliance and Sustainability regularly exchanges information with top management about Fair Wear membership and CSR-related issues. After key moments such as the annual Brand Performance Check, necessary steps and recommendations are discussed.

A sustainability exchange group was set up with other brands that are part of the Callaway Group. Quarterly meetings and an online system are used to exchange information and learnings.

Jack Wolfskin has an annual strategy and planning session with top management, and regular review meetings are held with the lower management levels. Country-specific risks and supplier performance are discussed during the these meetings.

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, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

**Comment:** During the previous performance check, two requirements were given; one for 1.9 and one for 1.11:

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

If a supplier fails to pay minimum wages, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected or additional verification by Fair Wear may be needed to verify remediation.

Jack Wolfskin showed intermediate follow-up on both requirements.

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## **Evaluation**

**Possible Points: 6**

**Earned Points: 6**

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## Recommendations to Fair Wear

- Follow-up on WEP training is sometimes perceived as difficult, reports often come in late and the findings are not very clearly defined. Jack Wolfskin suggests adding a Corrective Action Plan to the report, in order to more efficiently work on follow-up.
- Jack Wolfskin suggests Fair Wear offer a light version audit training for suppliers to learn more about how to informally monitor subcontractors.
- The company would like to see more alignment and collaboration between MSI's.
- CoLP and WIS need to be better explained, maybe with video and more graphics. Provide a local phone number or email/WeChat. Maybe consider developing an app or game to make workers more familiar with labour rights.
- During the pandemic, a lot of work was added by Fair Wear - this was perceived as heavy. Some country-specific requirements were not very clear, more guidance would have been helpful.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	30	52
Monitoring and Remediation	22	23
Complaints Handling	15	17
Training and Capacity Building	9	11
Information Management	7	7
Transparency	6	6
Evaluation	6	6
Totals:	95	122

### Benchmarking Score (earned points divided by possible points)

78

### Performance Benchmarking Category

Leader

## Brand Performance Check details

Date of Brand Performance Check:

05-09-2022

Conducted by:

Hendrine Stelwagen

Interviews with:

Melanie Kuntzawitz - Senior Head of Social Compliance and Sustainability

Imen Wong - Vice President of Product Development

Nicole Sieverding - Purchasing and Planning

Francisco Lopez Castro - Accounting