



## **Brand Performance Check**

### **Waschbaer GmbH**

**Publication date: November 2022**

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

## Waschbaer GmbH

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

Member company information	
Headquarters:	Freiburg im Breisgau , Germany
Member since:	
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bulgaria, China, India, North Macedonia, Romania, Tunisia, Turkey
Production in other countries:	Austria, Bosnia and Herzegovina, Germany, Greece, Lithuania, Poland, Slovakia, Spain, 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	100%
Benchmarking score	86
Category	Leader



## Summary:

Waschbaer has shown advanced results on performance indicators and has made substantial progress in 2021. Despite the COVID-19 pandemic, Waschbaer has met the monitoring threshold of 80% by monitoring 100% of its supply chain. With 86 points, Waschbaer has again been rewarded the 'Leader' category.





## Corona Addendum:

The year 2021 was affected by two things for Waschbaer. Firstly, the continuing COVID-19 pandemic was challenging both to the headquarter staff and the production partners, despite the fact that the Waschbaer was able to build on strong monitoring systems. Secondly, in May 2021, Waschbaer was a victim of a major cybercrime attack, which meant the brand's systems could not be accessed for several weeks. Waschbaer's first priorities in this crisis were to ensure all wages of company staff were secured and to ensure payment of suppliers could take place as usual. Within eleven days after the hack happened, Waschbaer's payment system was running again. In the meantime, the brand ensured it could use a bank account for urgent payments. Despite these challenges, Waschbaer closed the business year positively.

In the second year of the pandemic, Waschbaer continued on the same basis as the first year, accepting all delays. The brand used the country risk overview, which was maintained in collaboration with other Fair Wear members as long as this was relevant. When the situation was becoming more factory-specific, the brand used its close contact with suppliers to discuss their needs and support them in those needs. Waschbaer, for example, worked with more forecasts and prepaying materials. It organised regular roundtable meetings with different departments and suppliers to discuss any issues. The two crises made the brand realise again how important it is that suppliers are not entirely dependent on them, and therefore balancing the supply chain is part of the brand's long-term strategy.

Waschbaer conducted ten audits in 2021, ensuring more insight into the working conditions again after a year of relying more on alternative monitoring tools. Waschbaer focused on remediation of the findings related to excessive overtime and the topic of wages. As Waschbaer partly owns a production facility in China, the brand has set up a China task force to work on the risks related to sourcing in China. Finally, in 2021 Waschbaer created an extensive country human rights risk analysis based on the OECD criteria, which will be used as the basis for working on human rights due diligence going forward.

Overall, Waschbaer has strong systems in place to enable proper human rights due diligence and is actively working on strategies and systems to ensure the company can handle any future crises as well.



## 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.	65%	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, 65% of Waschbaer's production volume came from production locations where the company buys at least 10% of the production capacity. This is a decrease of 14 percentage points compared to 2020. At two key production locations, and at several smaller suppliers, the brand's leverage ranges between 40-100% of the supplier's capacity. This makes Waschbaer an important client for many production locations in its supply chain and it gives them a relatively strong position to work on the Code of Labour Practices (CoLP), together with these suppliers.

While on the one hand a large leverage provides opportunities, it also creates risks for suppliers which are almost entirely dependent on Waschbaer. This was already a point of attention because of the COVID-19 pandemic, but the importance became even clearer in 2021, as Waschbaer fell victim to a major hacker attack on its IT systems. Waschbaer is therefore stimulating these companies to also find other costumers and has been adding suppliers to its supplier base. This strategy explains the decreased percentage for this indicator. It is Waschbaer's long-term strategy to balance the purchase volume, from especially smaller suppliers, where the leverage is disproportionately high. This process is ongoing.

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.	19%	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.	2	4	0



**Comment:** In 2021, Waschbaer sourced 19% of its textile production volume from tail-end suppliers. This is an increase compared to 2020, which is related to Waschbaer's strategy to further balance its supply chain as explained also under 1.1a. In 2021, several new suppliers were onboarded for this reason. The new suppliers have only produced a small percentage of the 2020 FOB but this is expected to increase in the coming years.

Waschbaer ensures all suppliers, also the tail-end ones, are committed to the Fair Wear CoLP and Waschbaer's sustainability standards.

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.	63%	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, 63% of Waschbaer's production volume came from production locations where the brand's business relationship had existed for at least five years. This is a decrease compared to 2020, which is explained by the suppliers which were onboarded as part of Waschbaer's strategy to balance the supply chain.

Waschbaer uses its loyalty to compensate for its small size when it comes to working on social compliance issues at suppliers where the company has little leverage.

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:** Five new suppliers were added to Waschbaer's supply chain in 2021. In its supplier management system, orders cannot be placed before the questionnaire has been signed and returned. Waschbaer uploaded all questionnaires in Fair Wear's information management system.





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:** The due diligence process for onboarding new suppliers is well-known within the company and clearly and consistently explained by the different departments. All departments decide together whether a new supplier is added and all, including CSR, have equal veto rights. The Waschbaer internal wiki has a page which is designed as a checklist with several steps and clearly defined responsibilities of different departments when it comes to onboarding new suppliers and due diligence. When one step is finished, the next person receives a notification to proceed further. All steps need to be concluded and documented before sourcing can place any orders. The steps have been described in detail in previous performance check reports.

The final step is a visit to the potential new production location by a Waschbaer staff member. Normally this happens prior to starting production. In 2021, the new suppliers could not be visited before starting production due to the pandemic. Instead, video tours were done to get an image of the health & safety and other social compliance topics. Additionally, the brand requested a Fair Wear audit at two of the suppliers. Waschbaer also conducted Fair Wear audits at eight of its existing suppliers, getting insight into the situation at the factories and how the situation was impacted by Covid-19. Risks identified included payment of wages, excessive overtime, awareness of workers rights and various other points (see more under 2.4).

In 2021, Waschbaer's CSR team vetoed the adding of subcontractors in tier 2 in Italy, because of risks associated with subcontractors in the country. Waschbaer also developed a risk analysis matrix based on the OECD guidelines, detailing the main risks for each country where the brand is producing. Based on this analysis, the brand created a list of goals and measurements it wants to focus on in the coming two years.



In the context of COVID-19, Waschbaer continued to use the shared spreadsheet with COVID-19 related updates per production country which was started by a group of Fair Wear members in 2020 for as long as this was relevant. This sheet included the infection rates per country/region, changes in regulations, lockdowns, and other relevant risks. When a region or country was in lockdown, Waschbaer immediately reached out with standard questions regarding payment of wages, overtime and safety of workers. When the situation was not changing so often anymore, Waschbaer relied on the audits done in 2021 and regular contact with the factories to keep track of risks. Waschbaer identified as a risk in 2021 that as the pandemic was becoming more 'normal', governments were less strict on enforcing measures and less eager to support companies from the government side.

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:** Waschbaer has a supplier rating system to support its annual evaluation of all suppliers which is done by the Supplier Management Project Team. Every department that has worked with suppliers is contributing to the rating system which is based on a fixed set of indicators. The CSR team indicators on social compliance give insight into the responsiveness of the supplier and the ability/willingness to improve on the remediation of CAPs and working on the CoLP. The price of a product is not included in the supplier rating. The suppliers with good ratings are generally given more orders, or Waschbaer can choose to work closer with them on how to further support their work. Waschbaer's supplier strategy includes an overview of the performance of all suppliers and the long-term plans in working with these suppliers (intensifying collaboration or not).

The brand shares the results and areas of improvement with the supplier and together they set a timeframe to work on these. The evaluation of the suppliers relates directly to production decisions. The CSR team has veto rights and if a supplier is not progressing on its social compliance the team can use this veto to terminate the relationship.



In 2021, Waschbaer started the exit process of two suppliers based on the evaluation. However, when the brand indicated this to the suppliers, the supplier argued it was willing to improve on sustainability topics. Waschbaer then agreed to review after a period of six months whether enough progress has been made to keep working with this supplier. Waschbaer stopped collaboration with a subcontractor of one of its Turkish suppliers, because this supplier is not willing to work on corrective action plans. The brand had been reducing production at this subcontractor, in consultation with the main supplier, for a while and exited gradually following the brand's written responsible exit strategy.

In the context of COVID-19, and the hacker attack the brand was a victim of in May 2021, Waschbaer focused in this financial year on direct contact with the suppliers and being in dialogue with them about what they need, more than on the formal supplier evaluation. Nevertheless, the system is in place and was kept up-to-date throughout the year.

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:** Waschbaer has close cooperation and ongoing dialogue with its key suppliers and works together with them on the production planning. The production planning works slightly different depending on how the suppliers prefer to work.

At its Chinese supplier, where excessive overtime is a high risk, Waschbaer since a few years shares a forecast for a year in November with monthly breakdowns and indication of minimum and maximum quantities. The plan is first discussed. Then the factory gives feedback and sets lead times, based on which the planning is adjusted. Waschbaer does an advance payment to the factory to cover material costs. In case of late delivery, the brand adjusts its deadline and does not put extra pressure on its supplier, even if it means that new styles are not yet in stock when sales start. In 2021, Waschbaer has started providing forecasts for other suppliers as well. It is part of Waschbaers strategy to work more with forecasts similar to the way the brand works with the Chinese supplier.



In 2021, fewer delays were caused by COVID-19, because the suppliers got used to the pandemic situation. Material supply did still cause a lot of delays. To deal with this, besides increasing the number of suppliers where it uses forecasts, Waschbaer prefinances material and places orders much earlier. The lead times have been lengthened and are set in consultation with the suppliers. Waschbaer accepts all delays without penalizing suppliers. If an item really cannot be delivered in time, it is possible that it is excluded from the catalogue and only put on the website. Waschbaer stimulates its factories to ask the brand for possible changes in planning if there is a risk of excessive overtime.

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:** Ten of Waschbaer's suppliers were audited by Fair Wear in 2021 and eight of the audits included findings related to excessive overtime/reasonable hours of work. At three Turkish suppliers, excessive overtime was found. Waschbaer is collaborating with other members sourcing at these factories. At one factory, the capacity was increased by hiring more workers, and the factory indicated they are financially stable enough to turn down orders which might cause overtime. Waschbaer is expecting the working time records to verify this. Another factory in Turkey struggles with the high inflation rates, which causes workers to be eager to work overtime. Waschbaer is trying to find a solution together with the factory management, which both satisfies the brand and the workers, but this is a challenge which is ongoing. At the third Turkish supplier, another Fair Wear member is in the lead of following up on the finding. It was noted that a finding regarding inconsistent timekeeping records, has been improved since the last audit.





In India, the audit uncovered many hidden things, including an unwillingness of the factory to work on serious findings such as the excessive overtime. The factory denies the findings, and Waschbaer is waiting for proof that it is indeed incorrect. Waschbaer is likely going to exit this supplier because of the attitude of the factory. In Tunisia, Waschbaer shared with the supplier that excessive overtime is illegal and needed to be remediated, and the brand is waiting for confirmation that this is done. Workers are also involved and made aware that working more than six days in a row, is not allowed in Tunisia.

Waschbaer is part owner of its supplier in China, where it has been working on the topic of overtime for a long time. As a consequence, the last audit did not include excessive overtime. However, Waschbaer sees the overtime levels are just below the line of what is legally allowed and wants to work further on this. The brand feels it is important to be able to travel again, because it is difficult to discuss sensitive topics online in the Chinese context. Meanwhile, Waschbaer has set up a China taskforce to work together on how to continue the work in China (see more under 2.7).

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:** Waschbaer is aware of minimum wages per country and the Fair Wear wage ladders. For selected products, Waschbaer made a calculation that demonstrates a link between their buying prices and wage levels at the production location. The brand is working to further develop the open costing project and aims to create insight into the relation between prices and for more suppliers. Waschbaer has insight into the sewing minutes for some products, but not for all. Given the broad range of products, Waschbaer is thinking about ways to work on this which is not too complex and can be scaled easily. With some suppliers, Waschbaer trusts that they are asking for prices which suffice to pay the wages, and the brand does believe it is necessary to get insight into all details there.

If suppliers requested higher prices for the products because of the implementation of Covid-19 measures, Waschbaer simply accepted these costs. Waschbaer's purchasing department is made aware of the fact that prices are going to rise, because of increasing labour costs, but also because of rising energy and raw material prices, and inflation. Suppliers are asked to include these elements in the prices. If factories can demonstrate a certain price is needed to cover living wages, Waschbaer is willing to pay for this.



**Recommendation:** Fair Wear recommends Waschbaer GmbH 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. Waschbaer 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.	Yes	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.	0	0	-2

**Comment:** Audits conducted in 2021 identified several issues with the payment of legal minimum wages at Waschbaer's suppliers in Turkey, Romania, India and North Macedonia. Waschbaer has actively followed up on these findings.

In North Macedonia, it turned out to be an administrative error, which is in the process of being resolved (Waschbaer received the audit report in 2022). In Romania, the problems have been resolved, Waschbaer's intermediary increased the prices with 12% if the factory would demonstrate wages were also raised 12%. This was done and the workers were compensated for the missed wages. The brand collected proof of this from the factory, but is also waiting for an audit to be sure it is settled correctly. In India, the factory management denies all findings. The brand is trying to follow up as much as possible, but the process is being stalled by the factory. Waschbaer is planning to exit this supplier because of the attitude in CAP follow-up.



At one subcontractor in Turkey, the workers received 60% of wages as per government regulation during COVID-19. The factory was not aware it should have paid the other 40%. As this is a subcontractor, Waschbaer has very low leverage (1%). Therefore, the brand started collaboration with another Fair Wear member. They have verified that the factory is now again paying full legal minimum wages and is still in discussion with the other Fair Wear member how they can together support the factory for compensation. Doing this individually would not have much effect, considering the low leverage of the brand. At the main supplier, minimum wages were maintained during the pandemic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** No evidence of late payments by the member brand was found. Waschbaer fell victim to a hacker attack in 2021, which effected the payment systems. The brand then immediately prioritized the payment of suppliers by setting up another bank account through which the payments could be done manually. The brand informed its suppliers that for a period of up to 14 days, there would not be any payments, unless the suppliers would then run into problems. They requested suppliers which foresaw issues to reach out to the brand, but no suppliers did. Within eleven days, the regular booking software was functional again and the bank account did not need to be used.

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.	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	4	6	0



**Comment:** Waschbaer is well aware of the wage levels at its production locations and actively works on identifying why wages are below living wages. In 2021, Waschbaer accelerated the discussion around the topic of living wage with its suppliers again. At shared suppliers, Waschbaer finds that sometimes other brands can pay lower prices thanks to Waschbaer's higher prices. Waschbaer sees the need for systemic change in the whole industry and is trying to work actively with suppliers and other members to contribute to this. Another root cause of wages lower than living wages is the high inflation rates in countries like Tunisia and Turkey. Waschbaer has yet to find a solution to this issue.

Waschbaer has discussed the topic of open costing with its suppliers. Some are open to this or already doing it. Suppliers which already have strong costing systems in place, do not want to start using parallel systems. Especially the suppliers where Waschbaer has only a little production, which have their own systems, can be a bit reluctant. Waschbaer has started to work together on the topic with another Fair Wear member and wants to implement steps at a Turkish supplier together with this member, using the FairPrice app. The inflation situation in Turkey is making this very challenging, but also extra relevant at the moment.

Waschbaer tries to involve worker representation but finds this very challenging due to language and cultural barriers. As travel restrictions persisted in 2021, Waschbaer has yet to make progress on this topic.

**Recommendation:** Fair Wear encourages Waschbaer GmbH to involve worker representatives and local organisations in assessing root causes of wages lower than living wages and in working on strategies to deal with issues such as high inflation. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

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).	12%	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.	1	2	0

**Comment:** Waschbaer owns 30% of a production location in China (Representing 12% of Waschbaer's production volume in 2021).





Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Advanced	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.	6	6	0

**Comment:** Waschbaer has an overview of average wage levels at its suppliers and has agreed on target wage levels in consultation with factory management of seven suppliers. One of these suppliers has negotiated a CBA and Waschbaer is therefore not considering living wage estimates there. Waschbaer uses living wage estimates of Asia Floor Wage, the BSCI Fair Remuneration Quick Scan, and the living wage levels in audits. The first step the brand wants to take in step-by-step increase of the wages, is a 10-15% increase. The FOB prices will then be increased accordingly, but Waschbaer does not yet have insight into the labour component in all its prices, so it is not yet clear what the cost will be exactly. However, Waschbaer is willing to simply pay for higher prices if the supplier can demonstrate this is necessary to cover living wages. Waschbaer is working together with two other member brands in its work to improve wages at the factories.

**Recommendation:** It is advised that the strategy for how to finance wage increases is agreed upon by top management.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	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.	0	6	0



**Comment:** Waschbaer was not able to demonstrate payment of living wages is taking place at its suppliers in 2021 or that target wages for 2021 were met this year. Waschbaer has set target wages at several production locations (see 1.13) but could not demonstrate higher wages were paid in 2021. It should be noted here that Waschbaer has a significant part of its production in low-risk countries such as Germany and Austria.

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## **Purchasing Practices**

**Possible Points: 52**

**Earned Points: 39**

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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.	20%	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:	100%	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:** Waschbaer has dedicated CSR staff members to follow up on problems identified by the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case 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.	N/A	0	-1

**Comment:** Member makes use of Fair Wear audits and/or external audits only.



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:** Fair Wear audit report findings and Corrective Action Plans (CAPs) are shared with factory management and followed up during (video) calls, email or visits. Corrective actions are discussed during these meetings, and it is agreed which ones need to be addressed immediately. Depending on what the supplier explains they agree on a time-bound plan. The CSR team checks in due time whether this plan is followed. Waschbaer also requests the information to be shared with worker representation, but finds it challenging to really involve worker representation in follow-up as long as travel is not possible.

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.	Advanced	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.	8	8	-2

**Comment:** Waschbaer has a systematic and well-organised process in place to follow-up on CAPs. Waschbaer is cooperating with suppliers to remediate the issues identified in the CAPs, addressing both the issues that are easily solved as well as the more complex topics. Where there is very little progress on issues and Waschbaer finds little ownership to work on social compliance at the supplier, this is a reason for Waschbaer to consider exiting this supplier. This is the case in 2021 for one supplier in India, which denies most audit findings and is structurally stalling the follow-up process.





During the brand performance check, Waschbaer could show follow-up on all CAPs is in progress and parts had been remediated. More complex findings, for example that the worker representation was not democratically elected, have also been followed up on. As Waschbaer did a lot of audits, the brand prioritized the most high-risk findings such as issues with payment of legal minimum wages and excessive overtime. As travel was still not possible in 2021, Waschbaer relied on additional monitoring tools to follow up on CAPs, such as virtual factory tours. Waschbaer also continued to hold 'roundtable meetings' with its suppliers in 2021, during which more complex/sensitive topics were discussed with all staff relevant to the topic at Waschbaer and the supplier.

Waschbaer has been actively following up on complex findings related to social dialogue and worker engagement and implemented training to strengthen worker representation in two factories as well. Waschbaer created a country risk analysis which is being used to identify and work on similar problems in the rest of the supply chain.

**Recommendation:** Fair Wear recommends Waschbaer GmbH to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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:** This indicator is not applicable because of the travel restrictions due to COVID-19 in 2021. Waschbaer did not visit any of its tier 1 suppliers because of this reason, but the brand's agents visited eight factories, responsible for 15% of Waschbaer's total FOB. Waschbaer's agents are aware of the CoLP and CAP follow-up (see 4.3).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0



**Comment:** The majority of Waschbaer's production facilities has been audited by Fair Wear. A few external audits were added for production locations in Ukraine in 2021. Generally, Waschbaer uses external audits as a part of its due diligence and monitoring. The audits are assessed using the Quality Assessment Tool and discussed with the production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Advanced result on all relevant policies	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.	6	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	Advanced			6	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: ABRASIVE BLASTING**

All suppliers have signed and ensured they will not use abrasive blasting and this is part of the onboarding process, conform Waschbaer's policy. This topic is also covered in the article passport, a document Waschbaer developed for each style which includes (environmental) information on materials and the different (chemical) processes. Many countries where Waschbaer sources, legally do not allow sandblasting.

### **TURKEY**

Waschbaer formally created and shared with its Turkish suppliers its policy on working with migrant workers in 2020. The policy is not only applicable to Turkey but also to other countries, as discrimination of migrant workers is not limited to Syrian workers nor to Turkey. Waschbaer discussed the policy with its suppliers, which do not employ any migrant workers at the moment. Waschbaer thinks this may have to do with the fact that the suppliers are located far from the Syrian border.

Waschbaer also further mapped out all of its supply chain, a process which the brand started in 2020. A large mapping of all production steps for each product (not only Turkey) was created, linking each step to the involved suppliers/subcontractors. See also indicator 5.1.

### **OTHER/COVID-19**

From the beginning of the pandemic in 2020, Waschbaer has been proactive in keeping track of the situation at its suppliers and offering support when suppliers indicated they needed this. They shared information about workers rights, i.e. right to leave when ill, right to payment of wages, etc. and ensured measures were implemented to continue to work safely. Waschbaer kept track of all different situations and measures in the production countries through collaborating with other member brands (see indicator 1.4). When a factory or region was going into lockdown, Waschbaer immediately reached out to check if wages were being paid, as this was considered the main risk in 2021. Waschbaer relied more on audits in 2021 than on the additional monitoring tools set up in the first period of the pandemic, as the brand considers this third party monitoring a crucial way to get information which otherwise the brand would not receive (see 2.4 for more on general audit follow-up).



## CHINA

The brand is actively working on the challenges related to production in China, and set up a China Taskforce in the company in 2021. The brand is aware of specific risks along the whole supply chain, including raw materials and implemented strong additional monitoring activities to counter these risks, like conducting structural research by third parties along their supply chains. As the Chinese factory is partly owned by the brand, they are working on a long-term strategy how to continue the collaboration, attracting workers and increasing wages. It is challenging to make a lot of progress on sensitive topics while it is not possible to travel to the factory. Nevertheless, excessive overtime stopped occurring at the supplier.

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:** Waschbaer works very actively with other Fair Wear members and other brands in general on monitoring, visiting and remediation of Corrective Action Plans at shared suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	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:** Waschbaer sources from 16 factories in Germany, Greece, Slovakia, Poland, Lithuania and Spain. Waschbaer received and uploaded the Fair Wear questionnaire in the data management system along with the worker information sheets as proof that they are posted in all locations. Most of these suppliers are also GOTS certified and some German suppliers received full audits.





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:** Waschbaer has conducted two audits in 2019 at tail-end suppliers in Romania which are still valid and two new ones in Romania in 2021.

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, and member has collected necessary information	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.	2	2	0

**Comment:** Waschbaer's approach towards external brands is comparable to own production: the brand has sent and received the questionnaire and other relevant information and will also have collected audits or conducted audits at the external brands suppliers. Waschbaer also financed the auditing of an external producer in 2020. Waschbaer uploaded all the questionnaires in the Fair Wear database.

Waschbaer does not work with external brands if they do not agree on sharing production data.

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).	7%	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.	1	3	0



**Comment:** Waschbaer resells products of three Fair Wear member brands and one brand that is a member of FLA, jointly responsible for 6% of the external sales volume of 2021.

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

**Comment:** Waschbaer does not work with licensees.

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## Monitoring and Remediation

**Possible Points: 31**

**Earned Points: 31**

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### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	1	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 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:** At Waschbaer the CSR team is designated to address 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:** Waschbaer has uploaded evidence of hanging worker information sheets (WIS) in the factories into the Fair Wear information management system.



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.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** 13% of Waschbaer's production volume was covered by actively raising awareness of the Fair Wear Code of Labour Practices and the complaint hotline through WEP Basic training programmes conducted in the past three years.

Due to the COVID-19 pandemic, it was not possible to do any training programmes in 2020, but three WEP Basic trainings were organised in 2021 when this was possible again. An approved external training was conducted at a supplier in Ukraine and WEP Basic modules were implemented in India and China.

Some audits conducted in 2021 also included findings about lack of awareness on workers' rights. Waschbaer actively followed up on this (see 2.4).

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:** Waschbaer received one complaint in 2021 at its Turkish supplier. The complaint was about the wage levels and the lunch facility at the factory. Because of COVID-19, the factory cancelled the catering which used to be at the factory. Workers got compensated with a small amount but the complainant complained this is not enough to pay for lunch, and the facility is located in a remote area where food is not delivered. Workers are not allowed to go to the shop because this is also too far away. Also, the factory did not have sufficient equipment to heat lunch brought from home. Waschbaer is in discussion with the factory about possibilities to reinstating the canteen and in general about the wage levels and inflation. In the meantime, Waschbaer has ensured the factory bought several new microwaves.

Waschbaer had enrolled the factory in a WEP Factory Dialogue programme in 2019. Nevertheless, Waschbaer has received this complaint and others at the same supplier in 2022 (which are assessed next performance check).

**Recommendation:** Waschbaer is recommended to consider implementing another training at the factory to avoid complaints from reoccurring.

Considering the high inflation rates in Turkey, it may be much more beneficial for workers to receive lunch at work, than to be compensated for this in lira. Waschbaer is recommended to consider this in the dialogue around wage levels with the factory, and to support the factory management in involving worker representation in any decisions around this topic.

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 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.	N/A	2	0

**Comment:** Waschbaer is the only Fair Wear member sourcing at this factory.



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## Complaints Handling

**Possible Points: 9**

**Earned Points: 6**

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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:** Regular internal training on sustainability topics and Fair Wear specifically takes place throughout the year at Waschbaer. A leaflet on basic facts about Fair Wear and specific training of the customer service relations team is also carried out by the CSR department. In 2021, the CSR team did a webinar about the risk assessment the team developed, which was attended by the majority of staff including all department heads and team leads. The team also organised a kind of 'roadshow' with this risk assessment presentation, presenting it for every team separately.

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:** Staff in direct contact with suppliers receive additional training by the CSR team, including country-specific information. In 2021, the weekly meetings with the supplier management have been extended to also include supplier management shoes and supplier management home textiles.

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



**Comment:** The agents Waschbaer is working with are trained on Fair Wear requirements and support Waschbaer on following up on remediation and improvements. During the pandemic, the intermediaries could also visit the suppliers when Waschbaer was not able to travel.

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.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** Waschbaer conducted a WEP Violence & Harassment Prevention training at its supplier in India, which is responsible for close to 1% of the brand's FOB.

In 2019 a WEP Factory Dialogue training was conducted a one of Waschbaer's suppliers in Turkey. Since 2020, Fair Wear considers WEP Factory Dialogue an 'in-between training', because it may not lead to the long-lasting and large-scale impact desired by Fair Wear but does more than just awareness raising of the WEP Basic. Therefore, half the FOB from factories where this training took place counts towards this indicator. In 2021, Waschbaer sourced 13% of its FOB at this supplier, meaning 7% is counted toward this indicator.

Additionally, in 2019 an external communications training was conducted at Waschbaer's two Romanian suppliers, which account for little over 1% of the company's FOB. This training was arranged by another Fair Wear Member sourcing in the same two factories and the two brands collaborated on this.

Because of COVID-19 restrictions in 2020 and 2021 that limited the possibility to conduct training, this indicator is considered not applicable in this check.





Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	Active follow-up	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.	2	2	0

**Comment:** Waschbaer followed up on the training at the Turkish supplier by visiting, together with another Fair Wear member, and identifying steps to be taken in 2019. Follow-up was continued, but the final checking of improvements could not take place in 2020 due to travel restrictions related to COVID-19. The training in Romania was followed up on by including the relevant points in the factory's CAP. Waschbaer is still ensuring the CBA which was one of the results of this training is followed.

In India, the brand has tried to follow up on the training, but with limited success. The factory is not willing to work on improvements and has a negative attitude towards Fair Wear. Waschbaer is planning to exit this supplier because of this (see 1.5).

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## Training and Capacity Building

**Possible Points: 7**

**Earned Points: 7**

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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:** In 2020, Waschbaer created a complete mapping of all product groups and all production steps needed for the making of this product, linked to the relevant suppliers. This includes tiers beyond tier 1. Another 1500 products were added to this system in 2021 and further worked on the other tiers, including the origin of natural resources. This mapping overview allows Waschbaer to easily identify if a product includes a process for which no supplier has been identified. Additionally, Waschbaer has been working on creating a digital product pass and on turning the mapping into a digital system. This is expected to be implemented in 2023.

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:** In the Supplier Management Project group, the suppliers are discussed in the weekly meetings. The supplier management group has been expanded with one on shoes and one on home textiles in 2021. The CSR team is part of these project groups and actively share information about working conditions and other relevant issues.



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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:** Waschbaer communicates about membership in catalogs, brochures and on its website. The communication is in line with the Fair Wear 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:** Waschbaer's website(s) contain the latest Fair Wear Brand Performance Check reports and Social Reports. Waschbaer discloses 100% of its suppliers on its own 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.	For new member companies	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	N/A	2	-1





**Comment:** Waschbaer has submitted its social report to Fair Wear and has published the report on its website. ... i need to check if they are going to make this, otherwise will leave it n/a

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## Transparency

**Possible Points: 4**

**Earned Points: 4**

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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:** Head of departments are in regular contact with top management and also with the suppliers. Fair Wear is considered an important partner and gets the full attention of top management.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, 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.	N/A	4	-2

## Evaluation

**Possible Points: 2**

**Earned Points: 2**



## Recommendations to Fair Wear

Waschbaer would like Fair Wear to do more audits and to have more priority for the audit process. The brand feels that it seems the audits are becoming less of a priority instead and is worried that Fair Wear's capacity is not used for activities like audits.

Waschbaer also emphasized the need to know on time what Fair Wear is planning to do and expects from members, so they can plan for it also budget wise. Waschbaer finds it is difficult to keep track of all changes Fair Wear is working on and the expectations from brands. The brand recommends Fair Wear to make sure that support and guidance which is offered by Fair Wear is in line with the requirements and criteria set.

Waschbaer also does many notable things which cannot really be covered by the brand performance check and feels it would be good if this could be more acknowledged.

The brand is positive about the efforts to partner with other organisations and to get aligned with the OECD and EU legislation. Generally, Waschbaer is positive about the risk-based way of working and believes this is the way forward with proper guidance.



## Scoring Overview

Category	Earned	Possible
Purchasing Practices	39	52
Monitoring and Remediation	31	31
Complaints Handling	6	9
Training and Capacity Building	7	7
Information Management	7	7
Transparency	4	4
Evaluation	2	2
Totals:	96	112

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

86

### Performance Benchmarking Category

Leader





## Brand Performance Check details

Date of Brand Performance Check:

21-03-2022

Conducted by:

Paula de Beer

