



BRAND PERFORMANCE CHECK

GREIFF Mode GmbH & Co.KG

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this report covers the evaluation period 01-05-2018 to 30-04-2019

ABOUT THE BRAND PERFORMANCE CHECK

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

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

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

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

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

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

BRAND PERFORMANCE CHECK OVERVIEW

GREIFF Mode GmbH & Co.KG

Evaluation Period: 01-05-2018 to 30-04-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Bamberg, Germany
Member since:	15-03-2015
Product types:	Workwear, Corporate wear
Production in countries where FWF is active:	China, Macedonia, Republic of, Romania, Turkey, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Germany, Hungary, Moldova, Republic of, Morocco, Pakistan, Portugal, 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	96%
Benchmarking score	78
Category	Leader

Summary:

GREIFF has shown progress and met most of FWF's performance requirements. With a monitoring percentage of 96%, GREIFF goes beyond the required 80% after its third year of membership. With 78 points in the Brand Performance Check, FWF places GREIFF in the 'Leader' category.

GREIFF has a strong sourcing system that is systematically integrated with its implementation of the FWF Code of Labour Practice. The pricing practice provides the brand valuable insights on the labour cost per product. An independent third party verifies how the extra payments are reaching the workers. FWF encourages GREIFF to continue its current progress in increasing their knowledge of the relation between prices related to wages and begin to focus on possible solutions for more complex issues like living wage or social dialogue. Long-term relationships with many suppliers, combined with often high degrees of leverage at the production sites and regular visits to production sites, mean GREIFF is in a good position to work on the implementation of social standards.

GREIFF completed "develoPPP.de" project in Pakistan together with another FWF member and an external partner that resulted in SteP certification of the factory with the support of the workshops that focused on raising awareness on labour standards. Four other factories were also trained using external partners, which GREIFF actively follows up. GREIFF has a proactive approach in organising both trainings and audits and discussing CAP follow up with suppliers.

PERFORMANCE CATEGORY OVERVIEW

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

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

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

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

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

1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	97%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: In 2018, GREIFF continued to work with its four main suppliers from Bosnia, Ukraine, Morocco and Romania. GREIFF aims to work with small to medium suppliers where it can have significant leverage. At most of its suppliers, GREIFF has considerable leverage, giving them the opportunity to influence working conditions.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	5%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: In 2018, GREIFF bought 5% of its production volume from production locations where it buys less than 2% of its total FOB. GREIFF sources small quantities of specific products like ties and caps from these suppliers to offer their costumers a complete product range.

Recommendation: FWF recommends GREIFF to continue to evaluate their suppliers and consolidate its supply base and limiting the number of suppliers in its 'tail end'. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

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.	88%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: GREIFF bought 88% of its production volume from production locations where a business relationship has existed for at least five years. GREIFF has a strategy that prioritizes building long term relations with their suppliers.

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: In 2018, GREIFF had three new production location in Romania, Portugal and China, all of which signed and returned the questionnaire with the Code of Labour Practices before first bulk orders are placed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: Since February 2019, GREIFF developed and distributed a sustainability guideline with all its suppliers. This guide includes GREIFF's own internal sourcing policies and has integrated the FWF code of labour standards, which all suppliers need to confirm and sign.

When selecting new suppliers, GREIFF tries to stay in countries where they are already active and have done a risk analysis as part of their due diligence approach. Additional visits to all new suppliers are conducted before placing bulk orders and discusses labour standards. Any existing audit reports are requested and GREIFF conducts a Health and Safety Check with the FWF Health and Safety checklist. GREIFF also checks the supplier about the factory wage levels to assure that at least legal minimum wage is paid. The collective outcome of these checks provides GREIFF with enough information to make sourcing decisions.

GREIFF selects small and medium production locations where GREIFF has significant leverage and also looks for factories where other FWF members may be in order for better synergy.

Recommendation: If members receive an existing audit report it is advised to check the follow-up status of the issues mentioned in the report. This can give an idea about the suppliers' commitment to remediate CAP findings.

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: In 2018, GREIFF created an integrated evaluation system for each production location to collect information and to increase smooth communication. This evaluation includes supplier prices, quality of the product, timeliness of delivery and the supplier service.

GREIFF organizes supplier evaluations several times per year with relevant staff to discuss current issues at production locations and evaluate supplier progress with regard to CAP follow up. Evaluation of service is based on ease of working relations, trust, openness and responsiveness. Quality is checked inhouse and suppliers are also evaluated on performance, which includes deliveries and delays. Additionally, GREIFF evaluates compliance with Code of Labour Practices, checking at the questionnaires are filled in, the Worker Information Sheets posted and GREIFF visits the factories and discusses labour standards. GREIFF collects audits in a systematic way and discusses and monitors CAP follow up.

Through this evaluation, GREIFF has now started on this categorical overview of performance indicators at suppliers which provides information during discussions of which suppliers to continue working with, highlighting the risks, and where need be start placing a responsible exit strategy, slowly reducing the orders till the end of the year if relationship with supplier is to be terminated.

Recommendation: This is GREIFF's first evaluation system, FWF recommends to continue consistent annual evaluations and take the following step to conduct comparisons of all supplier's performances over time.

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

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

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

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

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

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

Comment: GREIFF has a general insight in which production countries overtime is an issue and for some production countries, this relates to retaining workers. To allow for the decrease in worker retention, GREIFF added another production location to their supplier portfolio to reduce potential strain on production. In general GREIFF accepts delays in delivery because GREIFF has some flexibility with their planning, and is able to delay some of their recurring NOS orders in case of urgency to less busy months. This is because GREIFF prioritizes customer orders before their NOS orders. GREIFF had no cases of excessive overtime reported in the audits conducted in the financial year 2018-2019.

GREIFF focuses on supporting planning at suppliers and strengthening communication with suppliers throughout the entire production timeline in order to foresee any potential delays or production pressure. In Bosnia, GREIFF invested in interest-free credit for buying new and efficient machinery to increase the productivity at Bosnia supplies that experienced production pressure.

Recommendation: FWF recommends GREIFF to continue support to factory management to improve on recording hours and manage overtime. One of the identified causes of overtime at suppliers has been the strain on the number of workers and the decrease in worker retention in some production facilities. FWF recommends cooperating with other customers at the factory not only to increase leverage but also further analyse root cause and try further mitigate excessive overtime hours.

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.	Advanced	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.	4	4	0

Comment: Every year GREIFF conducts wage checks at all suppliers annually, the lowest, average and highest wages paid to workers is collected. GREIFF calculated price break down per style and is aware of the percentage of the labour cost. Using this, GREIFF sets a target price for each article, taking into consideration the "German Fashion" union. GREIFF negotiates recurring basic model prices after legal minimum wages have been met. Otherwise, cost reduction is achieved through the quality of the fabric used or in the layout and cutting of the product.

For the suppliers in Bosnia, Ukraine, Romania and Morocco GREIFF showed that there was an increased CM prices. This is both as a result of inflation but also notably, by 7% in Bosnia. GREIFF is aware of when and how much increase in salary the suppliers are paying their workers. The wage increased were also consistently checked through external audits conducted by Sumations.

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, FWF 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, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

Comment: GREIFF conducts years wage checks, where wage information is gathered and compared to the country minimum wage benchmark. As part of their sourcing strategy, GREIFF has the policy not to work with suppliers that pay below minimum wage.

In the financial year 2018-2019, there was no failure to pay legal minimum wages issues reported at any of their suppliers. Minimum wages were supported and met in Pakistan supplier as of November 2018, when GREIFF successfully completed the of the SteP certificate as part of their “develoPPP.de” project to improve social and environmental standards in Pakistan. This was done in collaboration with another FWF member brand.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	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: GREIFF annually gathers wage reports from suppliers, which is cross-checked with the wage ladder tool and in the audit reports. Additionally, GREIFF uses FWF country studies as well as information from the Clean Clothes campaign to get the wage estimates; country profiles that include wages estimates with the wage on average, and lowest wages of workers. The project at their Pakistani supplier focuses on more transparency with regard to prices in relation to wages.

Overall, GREIFF has an overview of the price breakdown of its different styles with which they have also adjusted target prices. This is a result of the initial root cause analysis for lower wages than living wages followed by individual production level discussions on best solutions. Because of the long term relationship with suppliers, GREIFF has discussed the future of wages at suppliers, including different strategies to work towards higher wages. For example, in Ukraine due to fluctuating currency, GREIFF agreed-upon price ranges to assure consistent wages, this is to take into account the unstable currency which frequently drops from month to month.

Recommendation: FWF encourages GREIFF to also involve worker representatives and other local organisations in assessing root causes of wages lower than living wages.

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

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	4	0

Comment: GREIFF was able to show increase in prices at their supplier, which was then cross-checked for wage increases at factories during the Summations audits. In Ukraine, Moldova, Macedonian suppliers there was a clear impact where GREIFF was an increase in productivity and overall quality improvement. GREIFF has regular communication with production facilities on wages and adjusts prices accordingly.

GREIFF had initial discussions with suppliers about setting a target wage. The brand does not calculate the difference between the lowest paid wages and the living wage benchmarks.

Recommendation: GREIFF should continue the constant wage conversation with factory management, however FWF recommends that the strategy for how to finance wage increases is more clearly stated and defined within GREIFF's sourcing policy and agreed upon by top management. Furthermore, in determining what is needed and how wages should be increased, it is recommended to also involve worker representation.

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%	FWF 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	3	0

Comment: GREIFF has set initial target wages set together with factory and the production and technical manager. This is through yearly communications with the suppliers, and discussion. GREIFF could show evidence of all the ongoing discussion, and created a plan for wage increase.

Target wage has not been linked per se to living wage yet and calculations between prices paid and the possible gap between current wages and living wages.

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

PURCHASING PRACTICES

Possible Points: 47

Earned Points: 36

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	11%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	10%	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.)
Meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total of own production under monitoring	96%	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 FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: CSR manager works closely for a product manager who supports sustainability on technical production. Together they are responsible for 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 FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

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

Comment: GREIFF always tried to have a representative present when the auditors visit the production location. Once completed the audits and CAPS are shared and timelines are established with factory management. There is still no involvement of worker representatives during the CAP follow-up mainly because they are yet to be properly established.

Recommendation: Before an audit takes place, GREIFF is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. If not discussions for establishing consistent worker representatives can be started. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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

Comment: GREIFF conducts the majority of their audits through Sumations. GREIFF was able to show the audit quality assessment tool, and present the CAPs provided. GREIFF has created a collated overview where the CAP follow up progress has been tracked over the years per supplier. GREIFF discusses progress during visits and uses the timelines to set deadlines and regular reminders to suppliers for updates. The technical manager confirms changes to progress of remediation in person during visits and also discusses and open outstanding points from the CAP.

In addition to evidence sent via suppliers, and discussions during visits. A video in collaboration with the state fire department was created at GREIFF's Ukrainian supplier, where efforts to improve the fire and safety hazards were addressed.

Recommendation: FWF encourages GREIFF to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices. Additionally, GREIFF could 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.	95%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: 95% of GREIFF's production volume came production locations that have been visited.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	1	3	0

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

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Advanced result on all relevant policies	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	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	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: In 2018-2019, GREIFF did not source from Bangladesh and Myanmar and does not make any use of abrasive blasting.

For country assessments, GREIFF uses country studies, country profiles from the Clean Clothes Campaign, additional risk assessment based on agent information and experience and finally through in-country visits by the technical manager to multiple suppliers to get a grasp of ongoing industry issues.

GREIFF had one supplier in Turkey. They informed their agent responsible for this supplier about the FWF policy related to the employment of Syrian Refugees. The agent formulated a policy based on the FWF policy and actively approached the production location, where it increased awareness with regard to the different dimensions related to this topic. Syrian refugees are discussed on a regular basis with the supplier. As a last resort, GREIFF ended relationships with this supplier halfway through their financial year because of the lack of cooperation to share information by the supplier and high-reliability issue with regards to access to information on labour conditions at suppliers and Syrian refugees policy in factories.

In Eastern Europe, GREIFF has identified the declining worker population as a major risk. GREIFF is experiencing an ageing working population or an overall decrease in workers at suppliers within this region. Morocco, on the other hand, saw a 2% increase in workers at their suppliers.

In Pakistan, GREIFF worked with another FWF member at their shared supplier on a project as part of their German textile partnership activities. The aim of this project is to enhance suppliers' performance with regards to social and environmental standards as well as productivity and quality levels. The supplier receives training, workshops and one-on-one coaching and an external party reports about progress with regard to the labour standards in a detailed way with monthly follow up and discussions within the factory. The program supported the Pakistani facility in the preparation of the SteP by OEKO-TEX certificate, which was successfully completed in November 2018. The program measures and supports remediation towards issues including child and juvenile labour, wage and benefits, employment relationship, freedom of association, collective bargaining agreements and working hours including overtime.

Recommendation: If a supplier must be phased out, FWF encourages implement a responsible exit strategy and make sure all relevant staff is informed about this. This is especially important where member production is a significant part of total factory production. See FWF's guidelines on a responsible exit strategy: <https://members.fairwear.org/resources/responsible-exit-strategy/5>

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: GREIFF collaborated with Bierbaum Proeman in Pakistan and Macedonia, and with Engelbert Strauss have a relationship as a customer, and therefore shared suppliers in Bosnia & Pakistan.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	3	0

Comment: There are three suppliers in low-risk countries, in Germany, Hungary and more recently Portugal. GREIFF regularly visits the production location. The questionnaire was signed and returned and the Code of Labour Practice posted.

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).	No	FWF 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 FWF and recent Audit Reports.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	1	2	0

Comment: GREIFF has an outlet in Bamberg where 114 external brands are sold. The questionnaires are sent to all these external brands. 77% of the total external sales volume signed and returned the questionnaires for external brands.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	5%	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	1	3	0

Comment: GREIFF resells items from a FWF member and two FLA member.

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

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 27

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

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

Comment: The CSR manager (and were necessary the CEO) is involved in complaint handling.

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 FWF 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: GREIFF has made sure that the FWF CoLP and complaints hotline are posted in the factory. Additionally, the new sustainability policy created in 2018, was distributed amongst all suppliers, fabric suppliers and agents who work with GREIFF.

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.	57%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: GREIFF organized a basic level external training through Sumations for 57% of their suppliers in Morocco, Republic of Moldova, Bosnia and Herzegovina and Ukraine.

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	No complaints received	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.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

COMPLAINTS HANDLING

Possible Points: 9

Earned Points: 7

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: GREIFF makes use of their internal intranet workplace to inform all staff of activities including FWF membership. Additionally, GREIFF publishes a CSR brochure available for staff and customers where FWF membership is publicized. Lastly, the CSR manager sends an information email on any updates, there have been organized inhouse training in collaboration with Hessnatur Stiftung.

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

Comment: GREIFF makes use of the sustainability policy which is distributed to the purchasing team as well. There are also internal CSR material and labour policies where further information on FWF requirements are discussed. GREIFF has regular meetings internally and also participates in different FWF seminars, webinars and stakeholder meetings to make sure the responsible staff stay informed.

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

Comment: GREIFF's agents also have to sign their sustainability policy with additional sourcing policies and requirements. These include policies against change in production locations without agreement and anti-subcontracting agreements. The agents also agree with FWF's Code of Labour Practices and support its implementation at production facilities through regular checks of posted information sheets.

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.	5%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	1	6	0

Comment: In 2017, GREIFF started the "develoPPP.de" project in Pakistan as part of their German textile partnership activities. Aim of this project is to enhance suppliers' performance with regards to social and environmental standards as well as productivity and quality levels. The supplier receives training, workshops and one-on-one coaching and an external party reports about progress with regard to the labour standards in a detailed way with monthly follow up and discussions within the factory.

As part of this project, a series of workshops were Pakistan every six weeks covering topics on corporate social responsibility, quality management system (TQM), social compliance and working conditions, occupational health and safety and internal audits. In November 2018, the factory was SteP certified with the support of these workshops. The workshops have facilitated increased transparency and traceability within the factory, as the implementation processes are properly documented, monitored and improvement of the social working conditions continuous assessed.

Recommendation: FWF recommends GREIFF to address these issues by expanding training to other factories as well. GREIFF can make use of FWF's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is 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.	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: GREIFF follows up on training conducted through calls with suppliers, and have a feedback loop where suppliers can report on the outcomes of the training and remaining needs. GREIFF also has close contact with Sumations who conduct some of the training, where a follow-up report and outcomes are discussed.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

Earned Points: 8

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 2018, GREIFF specified a written agreement with all suppliers against subcontracting which is encompassed in the sustainability policy. All suppliers and agents were informed of these policies. This was discussed in the bi-annual visits to suppliers. The Quality Controller inhouse checks any inconsistency in the sewing and the technical manager frequently visits production locations to see products in the line. All the questionnaires were completed, there were no new subcontractors in this financial year. Previously found subcontractors from the previous year have been added into their supplier register on the database.

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 CSR and other relevant staff at GREIFF use the office intranet, calls and regular meetings to share all information with each other about working conditions at production locations.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

6. TRANSPARENCY

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

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

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

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 FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

Comment: GREIFF has submitted their social report and published it on their website.

TRANSPARENCY

Possible Points: 6

Earned Points: 5

7. EVALUATION

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

Comment: Evaluation of FWF membership is conducted in close collaboration between the CSR manager and top management. The CEO is actively involved in FWF membership and supports the needed actions following every Brand Performance Check last year.

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.	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: GREIFF had one requirement from the previous Brand Performance Check to actively monitor the payment of minimum wages, considering the different systems of payment of the different suppliers and prioritise focus in case of irregularities in CAP follow up.

GREIFF has worked together with the other FWF member to make sure they checked wages are paid and resolved with this supplier. Additionally, GREIFF now regularly requests wage updates from suppliers and cross-checks this with audit checks and also checked during the visits of the technical manager.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

GRIEFF would like to request the availability of worker information cards and any factory related resources multiple languages, specifically Ukrainian for them. Furthermore, GREIFF recommends FW increased collaboration with brands on social media posts including content co-creation and planning. GREIFF would like to see more FWF presence at large workwear fairs such as A+A Dusseldorf.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	36	47
Monitoring and Remediation	27	35
Complaints Handling	7	9
Training and Capacity Building	8	13
Information Management	7	7
Transparency	5	6
Evaluation	6	6
Totals:	96	123

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

78

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

16-10-2019

Conducted by:

Sandra Gonza

Interviews with:

Hans-Peter Beck - CEO

Nicole Wagner - CSR Manager

Daniel Clocuh - Head of Purchasing, Product Management and Marketing

Robert Pröll - Technical manager

Henry Hußlein - Purchasing