



Brand Performance Check

Greiff Mode GmbH & Co.

Publication date: October 2021

This report covers the evaluation period 01-05-2020 to 30-04-2021

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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

This years' 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 outbreak of 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

Greiff Mode GmbH & Co.

Evaluation Period: 01-05-2020 to 30-04-2021

Member company information	
Headquarters:	Bamberg , Germany
Member since:	2015-03-15
Product types:	Workwear
Production in countries where Fair Wear is active:	China, North Macedonia, Romania, Viet Nam
Production in other countries:	Bosnia and Herzegovina, Germany, Morocco, Pakistan, Portugal, Republic of Moldova, Ukraine
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	85%
Benchmarking score	65
Category	Good

Summary:

GREIFF has shown progress and met most of Fair Wears' performance requirements. With a benchmark score of 65 points, the brand is awarded the 'good' status. The brand has a monitoring percentage of 85%. Due to COVID-19, this does not determine the category for the brand performance check this year.

Corona Addendum:

The corona pandemic has had a great impact on GREIFF's operations. Sales dropped significantly and staff including CSR have been working on short-time for a considerable period. As a result of that, the brand focused on keeping the business healthy and could make less progress on projects such as living wage.

From the start of the pandemic, the CSR manager at GREIFF consulted Fair Wear guidance and guidance created by other organisations such as the Textilbündnis. In addition, the brand was in regular contact with all suppliers to hear from them about the situation in the factories. The brand did not systematically document the risks related to COVID-19 and its production countries but identified as main risks: unpredictability of the situation and suppliers having to cope with fewer orders from customers. The brand also conducted a supplier survey to ask what COVID-19 measures were taken, the impact on the workforce, and if the suppliers were receiving government support.

The Technical manager was mainly in contact with suppliers and reported about the conversations to the CSR manager. From the conversations, the brand learned that many were coping with less orders from customers. GREIFF has not cancelled any of its planned orders but the new orders were reduced significantly. Two production locations in Romania and Moldova received the opportunity to start producing face-masks for the local government, in conversation with these suppliers the collaboration was therefore stopped. That way, the brand could place more orders at its other production locations. Through dialogue with one of its main suppliers, the brand learned that the reduced order flow in combination with strong currency fluctuations had a major negative impact on the factory. To support the factory, the brand made an additional payment to the factory of 10 % of the total order volume over the year.

Contrary to other years, GREIFF did not collect wage information this year. At the same time, there was an increased risk of workers getting paid below legal minimum wage caused by national lockdown periods or factory closures. In the supplier survey, the brand did ask whether the suppliers were able to pay for workers on sick leave and if they had to lay off workers.

Overall, GREIFF's integrated monitoring system and long-standing relationships with its factories have shown its capability to deal with a crisis such as COVID-19 in a responsible manner. The brand could have taken more steps such as proactive wage collection and Fair Wear recommends GREIFF to re-start with projects such as living wage as soon as possible again.

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.	96%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: GREIFF has a stable supply chain with three main suppliers in Bosnia, Ukraine and Morocco. 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.	3%	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.	3	4	0

Comment: In 2020, GREIFF bought 3 % of its production volume at 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 its costumers a complete product range.

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.	77%	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 values long term relationships with its suppliers, they are generally not frequently replaced. In its financial 2020/2021, GREIFF bought 77 % of its total production volume from locations where a business relationship has existed for at least five years.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	2nd years + member and no new production locations selected	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.	N/A	2	0

Comment: In its financial year 2020/2021, no new production locations were added to GREIFF's supply chain.

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: In the past financial year, GREIFF did not add new suppliers to its supply chain. In general, 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 labour standards are discussed and special attention is given to assure at least legal minimum wages (LMW) are paid to all workers. Any existing audit report is requested and the quality is verified. Experience is that the quality of the report differs a lot and that most of them do not contain enough information to thoroughly be able to follow up on findings. GREIFF conducts a Health and Safety Check with the Fair Wear Health and Safety checklist. GREIFF also checks the factory wage level at new suppliers to ensure that at least legal minimum wage is paid. The collective outcome of these checks provides GREIFF with enough information to make sourcing decisions.

As part of its membership in the Alliance for Sustainable Textiles (Textilbündnis, Germany) GREIFF does a risk analysis for all countries where it sources from. Being a member of the Textilbündnis, GREIFF also has access to a new online tool called T-Rex where all risks of all production countries are well defined and always kept updated. T-Rex is used as an extra source of information.

From the start of the pandemic, the CSR manager at GREIFF consulted Fair Wear guidance and guidance created by other organisations such as the Textilbündnis. In addition, the brand was in regular contact with all suppliers to hear from them about the situation in the factories. The agents have been an important source of information for the brand as well. GREIFF did not systematically document the risks related to COVID-19 and its production countries but identified as main risks: unpredictability of the situation and suppliers having to cope with fewer orders from customers. The brand also conducted a supplier survey to ask what COVID-19 measures were taken, the impact on the workforce, and if the suppliers were receiving government support.

The brand had planned several audits to take place in the financial year 2020/2021, until recently it has been able to conduct one audit. The brand did not resort to additional monitoring tools.

Recommendation: Fair Wear recommends resuming auditing as soon as the situation allows. In case audits are not possible, members could use alternative monitoring options such as virtual factory tours. Fair Wear recommends GREIFF to audit suppliers that were severely affected by the Covid-19 pandemic.

The COVID-19 risk assessment should include country specific information regarding the lockdown and supplier specific information regarding its financial impact. It should link the changes in the member's purchasing practices to its impact on suppliers. This risk assessment should serve as the basis for dialogue between the member and supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

Comment: GREIFF has an integrated evaluation system for each production location to collect information and to ensure smooth communication. This evaluation includes supplier prices, quality of the product, timelines 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 in-house and suppliers are also evaluated on performance, which includes deliveries and delays. Additionally, GREIFF evaluates compliance with the Code of Labour Practices, checking whether the questionnaires are filled in, the Worker Information Sheets posted. GREIFF visits the factories and discusses labour standards. GREIFF collects audits in a systematic way and discusses and monitors CAP follow up.

GREIFF was greatly impacted by the corona pandemic and brand staff was in short time work for a considerable period including CSR staff. To monitor the situation at suppliers, the Technical manager was in regular dialogue with them and reported about the conversations to the CSR manager. From the talks with suppliers, the brand learned that many were coping with less orders from customers. GREIFF has not cancelled any of its planned orders but the order volume of new orders was reduced significantly.

Two production locations in Romania and Moldova received the opportunity to start producing face-masks for the local government, in conversation with the suppliers the collaboration with these locations was therefore stopped. That way, the brand could place more orders at its other production locations and limit the impact of the order reduction.

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, 80%) 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 (always in December for the coming year). 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 Africa 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.

Apart from the order volume reduction, the planning was not greatly impacted by COVID-19. The brand had enough stock in its warehouse to cope with delays in deliveries, it accepted all late deliveries without penalising suppliers.

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. In the financial year 2020/2021 there were no new audits conducted and the brand did not make use of alternative monitoring tools to verify whether excessive overtime was made in the production locations, also not for its sourcing countries where excessive overtime is a more common issue.

In general, GREIFF accepts delays in delivery because it has some flexibility in its planning. Due to its high stock levels, GREIFF is able to delay some of its recurring NOS orders which usually can be moved to less busy months. Moreover, GREIFF prioritizes customer orders over its NOS orders. In case of urgency, part delivery via airfreight at company expenses is possible.

After the first lock down period the brand discussed the topic of overtime and pressure on production during its calls with suppliers. Suppliers indicated they were not making over-time hours, rather, there was a risk of not having enough orders to fill up the production capacity. GREIFF has tried to minimise the impact of its order reduction on main suppliers by stopping to place orders at other suppliers that had the opportunity to start producing COVID-19 material for the government.

Recommendation: In cases where audits were not possible, the member could make use of additional monitoring tools, such as worker surveys, to monitor working hours at its suppliers. GREIFF is recommend to make use of additional monitoring tools or audits to collect information about overtime, especially for its production locations in Viet Nam and China.

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: In previous years, GREIFF conducted wage checks at all suppliers: the lowest, average, and highest wages paid to workers are collected. Wage ladders and country studies are used as background information. GREIFF negotiates recurring basic model prices after legal minimum wages have been met. In case needed, cost reduction is achieved through the quality of the fabric used or in the layout and cutting of the product. Due to the negative impact of COVID-19 on GREIFF's operations and the considerable time that staff has worked in short-time. The brand has not collected wage data in 2020/2021.

As a standard practice, to know the minutes needed to produce a single item, GREIFF uses the requirements of the "German Fashion union" which sets standard production minutes for different production steps. Knowing the minutes per production step allows GREIFF to know the production minute per style. The Technical manager is well aware of the standard production minutes needed and he is the responsible person for doing the price negotiations.

GREIFF calculates the price break down per style and is aware of the percentage of the labour cost in general. Aside from knowing the production minutes per style, GREIFF cannot demonstrate a clear understanding of the labour cost components of its buying prices. Labour costs are not fixed.

For the suppliers in Bosnia, Ukraine, Romania and Morocco GREIFF showed that there was an increased labour price. In general, GREIFF is aware of when and how much increase in salary the suppliers are paying their workers. The increased wages are consistently checked through external audits conducted by Sumations.

Through dialogue with one of its main suppliers, the brand learned that the reduced order flow in combination with strong currency fluctuations had a major negative impact on the factory. To support the factory, the brand decided to make an additional payment to the factory of 10 % of the total order volume over the year.

Requirement: GREIFF needs to ring fence how much of their pricing contributes to payment of wages.

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	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.	-2	0	-2

Comment: In other years, GREIFF conducted wage checks for all suppliers to ensure that all workers are paid at least legal minimum wage. Due to COVID-19, the brand did not collect wage information this year. At the same time, there was an increased risk of workers getting paid below legal minimum wage during lockdown periods or factory closures. The brand did conduct a supplier survey in which it asked whether the suppliers were able to pay for workers on sick leave and if they had to lay off workers. Supplier indicated they had no problems in regards to that but some of the suppliers indicate that the order volume had decreased significantly.

Requirement: Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

During COVID-19 the member is expected to thoroughly check with its suppliers whether they foresee any issues with payment of wages.

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: There is no evidence of late payments to suppliers by GREIFF and the brand did not change its payment terms during COVID-19.

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

Comment: GREIFF annually gathers wage reports from suppliers, which are cross-checked with the wage ladder tool and in the audit reports. Additionally, GREIFF uses Fair Wear's 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.

In 2020/2021 GREIFF did not collect wage reports of its suppliers due to the impact of COVID-19 nor did the brand discuss the topic of wages with factory management.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

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

Comment: GREIFF has had internal discussions on the topic of living wages and is planning to participate in a living wage project of the Textilbündnis. However, the main focus for the company in 2020/2021 was on staying in business and keeping losses due to the pandemic to a minimum. As such, no further efforts were made to develop a strategy to finance wage increases.

Requirement: GREIFF should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

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: Based on available information, none of GREIFF's production locations pay a living wage and GREIFF could not demonstrate that its prices cover a share of a living wage.

Purchasing Practices

Possible Points: 50

Earned Points: 26

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	79%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	6%	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	
Total monitoring threshold:	85%	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: The CSR manager works closely with the product manager who supports sustainability in technical production. Additionally, colleagues from purchasing are closely involved. Together they are responsible for problems identified by the monitoring system. When necessary the CEO is also involved.

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

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.	No Corrective Action Plans were active during the previous year	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.	N/A	2	-1

Comment: In the financial year 2020/2021 no new audits were conducted.

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

Comment: GREIFF conducts the majority of its audits through Sumations. 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.

While there were no new audits conducted in the financial year 2020/2021 open CAP issues of previous audits have been verified during the check. GREIFF could show it had followed up on most findings including it had worked on more complex findings such as Freedom of Association. Where possible the brand includes worker representation in the CAP follow-up and works with translators to overcome the language barrier. The brand was less informed about the CAP status of production locations where it sources through its trading partners.

Recommendation: GREIFF is encouraged to continue its activities to further establish independent worker representation in its production locations and to involve the representatives in monitoring and remediation of findings. In addition, the brand is recommended to closely follow up on CAP findings at production locations that are used through its trading partners.

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 to all members because of the travel restrictions due to the COVID-19 pandemic in 2020.

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: In 2020, GREIFF collected one audit report for its production location in Pakistan. GREIFF has actively worked with this supplier to receive the Green Button Certification.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	3	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	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: In 2020/2021, GREIFF did not source from Bangladesh, Turkey and Myanmar and it did 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. Being associated to the Alliance for Sustainable Textiles (Textilbündnis, Germany), GREIFF has access to T-Rexs which shows country specific risks related to its supply chain.

As general risks for its production countries, the brand identified the declining worker population as a major risk in Eastern Europe. It identified forced labour as a major risk in China and FoA as a risk in Morocco. For Pakistan, the brand identified gender inequality as the main risk. For the financial year 2020/2021, the impact of COVID-19 is considered high risk in all production countries with as main risks: the unpredictability of the situation and suppliers having to cope with fewer orders from customers

To remediate and prevent the risk of forced labour in its supply chain in China. GREIFF has checked its entire supply chain in China based on a checklist of the Textilbündnis. To work on FoA in Morocco, the brand has followed up on audit findings by means of training to the factory, and a new audit is planned as soon as that is possible again. In Pakistan, GREIFF is sourcing at a factory together with another Fair Wear member, the brands collaborate to mitigate the risks and they have a project at this factory as part of their German textile partnership. In addition, the products of this factory have been Grüner Knopf certified in the last financial year.

To remediate the risks related to COVID-19, the brand remained in close contact with all suppliers and adapted its delivery dates when needed to reduce the pressure on production. In conversation with two suppliers in Romania and Moldova, the brand has stopped collaboration (see also indicator 1.5). That way, GREIFF could place more orders at its other production locations. In addition, GREIFF has financially supported one of its main factories to deal with a reduced order flow and strong currency fluctuations (see more information indicator 1.8). In regards to Health & Safety measures for COVID-19, GREIFF has checked upon what measures were taken by the factories through its supplier survey and suppliers were also asked if they were following government regulations.

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. GREFF can provide additional measures for support and integrate that in the monitoring system.

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 two other Fair Wear Foundation members in 2020/2021, at two production sites in Pakistan and Bosnia.

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.: No (o)

Comment: GREIFF sources from three production sites located in so called low-risk countries. Monitoring requirements for these three production sites in low-risk countries are fulfilled.

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: Five production sites fall under the tail-end production locations. At two an audit was conducted and report / CAP followed up upon, making a total of 1% of the production volume

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	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.	1	2	0

Comment: GREIFF has an outlet in Bamberg where 60 external brands are sold. The questionnaires are sent to all external brands. For 61 % of the total external brand volume, the brand has received the signed questionnaires back.

Recommendation: Fair Wear 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).	13%	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: From all external brands, three brands are member of the Fair Labour Association and two are member of Fair Wear. In total this adds up to 13 % of the total external sales volume.

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

Monitoring and Remediation

Possible Points: 29

Earned Points: 22

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 Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: The CSR manager is involved in complaint handling, where needed the CEO gives support.

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: GREIFF has made sure that the Fair Wear CoLP and complaints helpline are posted in all factories. The posting of the Worker Information Sheet is checked during all visits and audits at the production locations. Due to the corona pandemic, it has not been possible for GREIFF to visit its suppliers. The brand did not make use of alternative tools such as online visits to check if the Worker Information Sheet was still posted.

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.	20%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: GREIFF has organized a basic level external training through Summations at its production partners in Ukraine and Moldova. Together, the training count for 20 % of the brand's total FOB.

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 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

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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: GREIFF makes use of its internal intranet workplace to inform all staff of activities including Fair Wear membership. Additionally, GREIFF publishes a CSR brochure available for staff and customers which contains information about the Fair Wear membership. The CSR manager works closely together with the sales and marketing department and has given trainings on this topic.

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 is informed about Fair Wear requirements through regular meetings and the internal intranet workplace. Moreover, they have direct access to the CSR folder of the CSR manager where all information about Fair Wear membership is stored.

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: GREIFF is in direct contact with all its production locations. No matter whether an agent is involved or not. The company works with agents for its production locations in Macedonia, Marocco and Romania.

GREIFF's agents also have to sign the company's sustainability policy with additional agents' related sourcing policies and requirements. The agents are also actively involved in CAP follow-up.

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.	0%	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.	0	6	0

Comment: None of the production sites participated in training programs that support transformative processes related to human rights.

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

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

Training and Capacity Building

Possible Points: 11

Earned Points: 5

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: Since 2018, GREIFF has a specific written agreement with all suppliers against subcontracting. The agreement is encompassed in its sustainability policy. All suppliers and agents are informed about the policy. Moreover, a significant part of the brands' collection is NOS products which remain the same for a period of two years or more and are produced by the same factories.

With the introduction of the myGREIFF-Code (see also 6.2), GREIFF is aware of all production partners used for the production of its NOS products. This contributes to diminishing the risk of unauthorized subcontracting.

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	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: GREIFF communicates about Fair Wear through its website and social media. Moreover, the brand has created a CSR brochure that includes information about the membership. The brand has also spoken about the Fair Wear membership at online events organized by the Chambre of Commerce and Textil Bundis.

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 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.	1	2	0

Comment: GREIFF is transparent about its supply chain through MyGREIFF-Code. The myGREIFF-Code can be found on the label of its NOS garments. Using the myGREIFF code, the customer can see all steps of the production process on country level. In addition, GREIFF publishes its brand performance check report.

GREIFF has signed the Fair Wear transparency policy but it has not yet disclosed its factories on the Fair Wear website or to other members in FairForce due to capacity issues caused by the corona pandemic.

Requirement: Fair Wear requires member brands to disclose production locations to other member brands in FairForce and on the Fair Wear website.

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

Comment: GREIFF has submitted its social report and published it on its 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 Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Evaluation of the Fair Wear membership is conducted in close collaboration between the CSR manager and top management. The CEO is actively involved in the Fair Wear membership and supports needed actions.

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

Comment: Last year, GREIFF had received requirements on the indicators related to living wage implementation (1.8, 1.11, 1.13 and 1.14). Due to the Corona pandemic, brand staff has worked in short-time for a considerable period and the focus for the company was on keeping the business healthy. As a result of that, no progress has been made on the implementation of living wages.

While it is out of the scope of this Brand Performance Check, it should be noted that GREIFF has re-started working on living wage implementation in its current financial year. The company participates in a living wage project of the Textilbündnis. As such, it was decided to apply leniency on this indicator and the indicator is assessed as Not Applicable.

Evaluation

Possible Points: 2

Earned Points: 2

Recommendations to Fair Wear

GREIFF recommends Fair Wear to create more communication material that brands can use. If possible tailored to the German market.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	26	50
Monitoring and Remediation	22	29
Complaints Handling	7	9
Training and Capacity Building	5	11
Information Management	7	7
Transparency	5	6
Evaluation	2	2
Totals:	74	114

Benchmarking Score (earned points divided by possible points)

65

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

11-10-2021

Conducted by:

Annemiek

Interviews with:

Nicole Wagner - CSR manager

Robert Pröll - Technical manager

Daniel Clocuh - Head of Purchasing and Productmanagement

Antonia Sterl - Head of Marketing

Jens Möller - Managing director