



Brand Performance Check

Schöffel GmbH & Co. KG

This report covers the evaluation period 01-01-2022 to 31-12-2022

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.

Scoring overview

Total score: 130

Possible score: 208

Benchmarking Score: 63

Performance Benchmarking Category: Good



Summary:

Schöffel GmbH & Co. KG (Schöffel) has met most of Fair Wears' performance requirements. With a total benchmarking score of 63, the member is placed in the Good category. For the financial year 2022, the separate member accounts of Schöffel Sportbekleidung (Schöffel Sport) und Schöffel Pro were merged under one brand account under the Schöffel GmbH & Co. KG. (Schöffel). This report summarises the actions of both brands. If there is a differentiation in processes, etc., the report specifies this per brand.

Schöffel has a sourcing strategy that focuses on maintaining long-term relationships. The brand has a strict onboarding process and a thorough due diligence process for new suppliers.

The member brand conducts risk scoping on country and supplier levels for Tier 1 and Tier 2. The risk analysis covers all eleven sector risks, including all eight labour standards per Fair Wear's Code of Labour Practices. Schöffel has determined appropriate monitoring tools as an outcome of the risk scoping for all suppliers with heightened and enhanced risks. In addition, the brand keeps extensive overviews on freedom of association, gender, wages, overtime and internal complaints mechanisms per production location.

In 2022, the brand further improved the efficiency of internal processes between planning and logistics inbound teams for Schöffel Sport. Issues related to late material delivery were solved by shipping materials by air (at the brand's own cost) or splitting orders into two delivery dates. For Schöffel Pro, the planning process is different. Planning is made for the entire year, which helps suppliers to fill production lines in the low season.

Audits show a living wage estimate is paid by suppliers responsible for 31% of Schöffel's FOB considering the mode wage of sewing workers. The member has discussed wage increases mainly with partners in Myanmar. Schöffel does not have a strategy yet to finance wage increases at its suppliers.

In 2023, the brand should focus on the biggest challenge of heightened due diligence in Myanmar, including living wages and continue including freedom of association and gender in its improvement and prevention programmes.

The member has scored insufficient on some repeated non-compliance indicators. If Schöffel scores insufficient for the second time on these indicators, the member will be automatically placed in Needs Improvement.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes new indicators, which may result in a lower score for member brands. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

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.

Company Profile Schöffel GmbH & Co. KG

Member company information

Member since: 1 Jan 2011

Product types: Outdoor products, Sports & activewear, Workwear and Outdoorwear

Percentage of CMT production versus support processes 100%

Percentage of FOB purchased through own or joint venture production 0%

Percentage of FOB purchased directly 99%

Percentage of FOB purchased through agents or intermediaries 98%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's Partnership for Sustainable Textiles, Bluesign, RDS (responsible down standard), RWS (responsible wool standard), Other Initiatives

Number of complaints received last financial year 5

Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes

Work Plan and projected production location data have been submitted for the current financial year? Yes

Membership fee has been paid? Yes

Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
Viet Nam	16	32
Myanmar	6	29
China	14	18
Ethiopia	1	6
Indonesia	3	5
Albania	1	4
Latvia	3	2
Ukraine	1	2
Portugal	4	1
Cambodia	2	1
Türkiye	3	1
Germany	2	0
Italy	1	0

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

Comment: Schöffel has a solid Responsible Business Conduct Policy in place.

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.: Yes

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

Comment: Schöffel discloses 54% of production locations internally through Fair Wear's information management system. Fair Wear does not disclose Chinese factories on its website yet and therefore is lenient when members do not disclose Chinese factories.

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

Comment: Schöffel discloses 54% of production locations externally on Fair Wear's transparency portal. Fair Wear does not disclose Chinese factories on its website yet, and therefore is lenient when members do not disclose Chinese factories.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 64

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

Comment: Schöffel has a sourcing strategy addressing influencing labour conditions. The member has 56 production locations in 13 different countries, which includes support processes such as printing or embroidery. 58% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 11,7% of the production volume comes from suppliers where Schöffel buys less than 2% of its total FOB. This includes factories of Schöffel Sport and Schöffel Pro. Even though the FOB figures of both brands were combined, the tail-end is comparable to last year of Schöffel Sport. The member's sourcing strategy explicitly focuses on increasing influence through active cooperation with other clients. The brand regularly reviews its supplier base to consolidate further but remains to have a tail-end in various production countries for specific products such as accessories, underwear, belts etc.

Recommendation: Fair Wear recommends Schöffel to consolidate its supply base by limiting the number of production locations in its tail end. To achieve this, Schöffel should determine whether suppliers, where it buys less than 2% of its FOB, are strategically relevant. Shortening the tail will allow the member to improve working conditions more efficiently and effectively. Describing the consolidation process in a sourcing strategy agreed upon with top management/sourcing staff is advised.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

Comment: Schöffel has a sourcing strategy that focuses on maintaining long-term relationships. 65% of the member's FOB volume comes from suppliers with whom Schöffel has had a business relationship for at least five years. The member does not commit to long-term contracts yet, in which it commits to buy a certain volume for the coming years.

Recommendation: Fair Wear recommends Schöffel to commit to long-term contracts. Long-term contracts in which the member commits to buy a certain volume for the coming years.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

Comment: Schöffel conducts risk scoping and includes all five risk factors in alignment with the OECD guidelines. The comprehensive risk scoping uses country studies, risk checker tools and stakeholder information to identify potential risks on the country level. All eight labour standards are included. The focus is on sectoral risks of the textile and clothing industry in all procurement countries. Potential risks arising from Schöffel's business and procurement model are also included. The brand has included cooperation with licensees as a business model risk in its risk scoping. As product-related risks, product range, materials and production processes were analysed. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The risk scoping also includes a gender lens. The member mainly looks at discrimination, sexual harassment and gender-based violence. Schöffel has yet to include input from workers and suppliers in the risk analysis. The member has adjusted its sourcing strategy based on the results of its risk scoping, the Brand considered so. Schöffel's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and bargain collectively.

Recommendation: Fair Wear strongly recommends Schöffel to adjust its sourcing based on the results of its risk scoping.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: It is the standard process for Schöffel to inform new suppliers about Fair Wear membership by sending information on the Fair Wear requirements. This process has been followed for all three suppliers added last year. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Schöffel can cooperate on this topic.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Intermediate	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	4	6	0

Comment: Schöffel collects human rights information of potential new suppliers. This includes factory inspections, personal dialogue, the Fair Wear questionnaire, consultation of relevant stakeholders and other Fair Wear members, review of external audit reports and CAP follow-up where available. Visits of the member's CSR staff or the Director of Quality and Corporate Sustainability are also part of the due diligence process. The decision to start working with a new supplier is made during team meetings with production, management and CSR. The onboarding is terminated if a supplier does not fulfil the brand's CSR requirements. Schöffel does collect systematic information from workers or stakeholders to inform the sourcing decision. If existing audit reports include worker interviews, these are used, but the brand does not request, e.g. Fair Wear audits as a pre-requirement. In 2022, no reports, including worker interviews, were available for the three new suppliers in Indonesia, Ukraine and Vietnam.

Recommendation: Fair Wear encourages Schöffel to collect worker and stakeholder input before placing the first order. Fair Wear strongly recommends that the member collects information about working conditions for suppliers used by licensees.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Intermediate	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	4	6	0

Comment: Schöffel has added three new suppliers in Vietnam, Indonesia and Ukraine. The member shared information about Fair Wear's CoLP and the complaints helpline within the first year of business. The Worker Information Sheet has been posted. Schöffel enrolled one of the three suppliers in a WEP Basic within the first year of starting the business. The brand has not yet organised onboarding sessions for its other two suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue. A WEP Basic training was planned for the Indonesian supplier, but the business relationship ended during the first year. Training options at the Ukrainian supplier were limited due to the war.

Recommendation: Schöffel is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism for its Ukrainian supplier, as suggested by the brand during the performance check, with the help of the brand's quality staff.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

Comment: Schöffel systematically identifies human rights risks in its supply chain and has assessed the risks for each production location. It has determined the appropriate monitoring tool and frequency for most countries. Generally, the brand enrolls suppliers in audits and organises on-site visits of the CSR and sourcing team. In addition, the brand is constantly exchanging with other brands, sourcing at the same factories. In Myanmar, where heightened due diligence is required, the brand works with a local technician supporting monitoring and CAP follow-up. In addition, all suppliers were audited by an external third party. Vietnam is a high-risk country for the brand, and both leverage and FOB volume are high. Therefore, Schöffel has a local team of technicians that support the monitoring and CAP follow-up where needed. In 2022, Schöffel started production in the Ukraine with a longstanding partner. Since the outbreak of the war, the brand has been in regular contact with the supplier to ensure following the heightened due diligence requirements. In countries such as China, Cambodia, Ethiopia or Türkiye, the brand has not defined any additional monitoring tools next to audits and visits, even though these countries had the highest 'average risks' on the country level. Monitoring tools do not explicitly include worker, stakeholder and supplier input.

Recommendation: Fair Wear recommends Schöffel to review monitoring tools and frequency depending on the outcome of the risk scoping and risk assessment, especially for China, Cambodia, Ethiopia and Türkiye.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: Schöffel has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are systemic violations of the rights of freedom of association on the country level, non-democratically elected worker representatives, and yellow unions. Schöffel uses this information to understand the risks at its suppliers and inform itself how to engage with its suppliers on this topic. In Myanmar and Vietnam, the local technicians regularly exchange with trade unions and worker representatives. The member has supplier-level monitoring in place using the Fair Wear Supplier questionnaire (Tool 2) to assess and understand the risk at suppliers. The member knows which suppliers have trade unions and CBAs in place. In addition audit reports are used to map supplier level risks and identify improvement programs. In Myanmar the brand has a close exchange with factory management and a local stakeholder on FoA risks.

Recommendation: Schöffel is recommended to strategically use and strengthen the exchange of local technicians with worker representatives and unions in Vietnam and Myanmar. Schöffel is also recommended to join a multi-company CBA, for example in Vietnam, if possible.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Intermediate	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	4	6	0

Comment: The member could show a basic understanding of gender risks for its sourcing countries and, for instance, identified discrimination, sexual harassment and gender-based violence as significant risks prevalent in Cambodia, Myanmar, China and Türkiye. Additionally, in 2021 Schöffel actively collected gender data per factory for nine production locations in Vietnam, Ethiopia and Myanmar. The member collected in-depth data about anti-harassment policies and committees, training programs, wage, job seniority and working hour information by gender. This information is collected through a questionnaire and personal meetings. The data has not been updated in 2022. Instead, the member kept basic gender data updated from audit reports only, including the percentage of gender split of workers, women in supervisor positions, and the percentage of women in worker committees.

Recommendation: Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices. Schöffel is recommended to collect gender data for all CMT factories for 2023.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Intermediate	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	2	4	0

Comment: Suppliers' human rights performance is evaluated systematically every year by Schöffel Sport. The brand has a strong and systematic evaluation system for assessing suppliers' human rights performance. A structured scoring system was used and was shown during the performance check. Various criteria, such as quality, price, and delivery, are included in the supplier evaluation. All of those criteria are weighted differently. Corporate responsibility has the highest weight in this scorecard. For example, the supplier's CAP follow-up and complaint handling are included here. Schöffel Sport works together with suppliers to achieve continuous improvement. If a supplier does not show any effort or willingness beyond a certain period, the brand stops the business relationship.

Schöffel Pro does not yet evaluate its suppliers' human rights performance, so the evaluation process does not cover suppliers exclusively producing for Schöffel Pro. Occasionally, the outcome of Schöffel Sports' evaluation influences purchasing decisions. In 2022, for example, one production partner scored very low on CSR, which was why a responsible exit was discussed and is currently in the process. The member has not yet collected information about the human rights performance of the production locations used by its licensees.

Requirement: Schöffel needs to evaluate the human rights performance of all its suppliers systematically, including the suppliers exclusively producing for Schöffel Pro.

Recommendation: Fair Wear strongly recommends to evaluate as well as tail-end suppliers that are not covered yet.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Advanced	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	4	4	0

Comment: Schöffel uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations in the database. For Schöffel, disclosure of supplier details, including subcontractors, is part of the agreement the company signs with each supplier. This information is cross-referenced with several sources to verify: onsite quality inspection during factory visits, audit results, discussions with the factory, conversations with other brands, and gaining an understanding of the production processes in the factory. Schöffel addresses subcontracting in its licensing agreements.

Additionally, the member actively prevents unauthorised subcontracting by visiting suppliers during production. Schöffel's staff visits the production locations regularly. The CSR staff systematically double-checks documents such as the Fair Wear questionnaire, supplier register, financial records and inspection reports from different departments like purchasing, logistics and quality. Also, the local technicians are trained to double-check possible subcontracting regularly onsite.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Advanced	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	4	4	0

Comment: Schöffel has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because of the highly technical products developed by the brand. In addition, frequent in-person visits by the brand's technicians, especially at the strategic partners in Myanmar and Vietnam, reduce the risk. In Türkiye, all suppliers were explicitly asked about homeworkers, and no supplier indicated the use homeworkers. Eight suppliers were audited by a third party, including checks on homeworkers, and no homeworkers were found.

Recommendation: Schöffel is recommended to systematically include explicit questions about homeworkers in its supplier data collection.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Insufficient	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	0	4	0

Comment: Schöffel uses contracts with its suppliers. The member has agreements in the form of written framework agreements that also include clauses on penalties and liability. These contracts do not support human rights due diligence because an unequal burden is placed on the suppliers by including penalties (discounts, air freight, etc.) for delivery delays, partial shipments or quality issues without proof of fault by the supplier. On the other hand, the clauses on liability include a specification of proof of fault by the supplier. In addition, the brand includes high penalties for copyright and unauthorized subcontracting. Since establishing the contract frameworks five years ago, the brand confirmed these penalties were never applied. Payment terms are stipulated in an additional registration form and are paid directly within one week at the latest. Although the contract includes the Code of Labour Practices, it does not support the implementation of human rights due diligence. These contracts do not yet mention the shared responsibilities of CoLP implementation.

Requirement: Schöffel should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

Recommendation: Fair Wear strongly recommends that Schöffel remove penalties for late delivery from its contracts or at least ensure there is 'proof of fault by the supplier'.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in their decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. This is done regularly as part of the sourcing roundtable and on a strategic level twice a year with top management. In 2022, the exchange with top management occurred monthly as part of the CSR strategy revision process. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

Recommendation: Schöffel could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments. Schöffel could include responsible business practices in its job role competencies of sourcing and purchasing staff.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Advanced	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	6	6	0

Comment: Schöffel Sport has an integrated production forecasting, planning, and delivery system. The production planning is entirely digital via an internal ERP data system. Digitalising the whole process has helped the brand improve efficiency, lead times (factory holidays visible, means of transport, fabric lead times, etc.) and transparency. The orders are consolidated and placed per season, respecting the lead times given by each factory. A Schöffel Sport technician regularly visits most production sites during production for quality control. When sharing forecasts, the supplier is explicitly notified that production planning and final production and delivery agreements need to be reachable during regular working hours (without overtime hours). Schöffel Sport sends the forecast to the supplier four months before placing the order. Never Out of Stock (NOS) products are spread for production during the low season and have more flexible delivery times. Production time is calculated with the supplier, including extra time, e.g., product development, delivery time for fabric, production and transportation time. These are compiled in costing sheets. Schöffel Sport knows each factory's production capacity, collected through factory datasheets. The brand analyses its suppliers' peak and low seasons production capacities before placing orders and evaluates previous production planning with the supplier.

In 2022, Schöffel Sport further improved the efficiency of internal processes between planning and logistics inbound teams. Another improvement was made by starting the planning two months earlier and strategically including stock levels in the planning process. Issues in the last business year related to late material delivery were solved by shipping materials by air (at the brand's own cost). Another solution found was splitting orders into two delivery dates.

For Schöffel Pro, the planning process is very different from Schöffel Sport. The brand does not work with seasons and produces for its stock. The planning is made for the entire year, which, for example, can be used by the supplier to fill production lines in the low season. The products are customised, and some products are based on a style from Schöffel Sport, which supports production efficiency.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at 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, cost sheets including labour minutes.	6	6	0

Comment: Schöffel strongly understands the wage levels at its suppliers and connects this understanding to its buying prices. Schöffel works with open costing, has advanced insight into the labour component of its prices, and knows the number of actual sewing minutes needed for a style. The brand knows the labour minute value at all of its suppliers. Schöffel includes changes in legal minimum wage or inflation in its buying prices.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Advanced	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	4	4	0

Comment: Schöffel Sport does not make use of sourcing intermediaries. The member's sourcing model purposely excludes the use of sourcing intermediaries. Schöffel Pro works with one agent, as this was a former supplier of Schöffel Sport. The business relationship was initiated via an agent and therefore remains in this set-up. Schöffel Pro has informed its sourcing intermediary of Fair Wear requirements and has direct contact with the supplier.

Layer 3 Remediation and impact

Possible Points: 96

Earned Points: 54

Indicators on Quality and coherence of prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Advanced	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	6	6	0

Comment: Based on the risk identification described in Chapter Two, Schöffel has linked factory risks to appropriate follow-up for factories covering 70% of FOB. Whenever harm is identified in a CAP or complaint, this is the base for the brand's improvement plan. As Schöffel produces in Myanmar, priority is given to improvement programs via a third-party in Myanmar. Schöffel will start sourcing in Bangladesh and signed the International Accord in 2023.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: As described under indicator 2.9, Schöffel started collecting gender-disaggregated data for nine factories in 2021. In 2022, the member kept only basic gender data from audits updated, including the percentage of gender split of workers, women in supervisor positions, and the percentage of women in worker committees. If gender-related issues are found during audits or complaints, these are followed up and integrated into the improvement plans. In the last financial year, only one gender-related issue was reported in an audit at a Vietnamese supplier and remediated as part of the CAP follow-up.

Recommendation: The member is encouraged to include a gender lens in all its improvement and prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: Schöffel included some steps to encourage FoA and effective social dialogue in its improvement or prevention actions. In Myanmar, a high risk of freedom of association was identified at the country level. Therefore, Schöffel enrolled all Burmese suppliers in trainings promoting social dialogue and practical grievance mechanism by a third party in Myanmar. If FoA-related issues are found during audits or complaints, these are followed up and integrated into the improvement plans. The member has yet to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: Schöffel is recommended to support by financing training on FoA and social dialogue for its suppliers in other countries than Myanmar e.g. Vietnam.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Intermediate	Fair Wear’s complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	4	6	0

Comment: Schöffel actively supports and monitors the effectiveness of internal grievance mechanisms. The brand has an overview of the internal complaints mechanism at the production partners, including which channel can be used to address grievances, which process is defined (responsibilities, timeline to address complaints) and if written records and meeting minutes are available. In a comment field, each grievance mechanism is described in more detail. The brand also evaluates each supplier located in a risk country to determine whether or not the internal mechanism is considered as functioning. The conclusion was that only three out of 36 analysed production locations in risk countries are considered to have an effective internal grievance mechanism. Not for all 33 factories, a follow-up action has been identified yet. Schöffel responds when the mechanism is reported ineffective in a CAP or complaint. In 2022, a complaint was registered on ineffective grievance mechanisms at a supplier in Myanmar, which was remediated in two steps and verified by a third party in Myanmar.

Recommendation: Schöffel is encouraged to set up a prioritisation plan to follow up step by step when internal grievance mechanisms were identified as not functioning.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Advanced	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	6	6	0

Comment: Schöffel cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. The brand also collaborated with customers who are not Fair Wear members. In 2022, Schöffel, another Fair Wear member and a non-member brand, wrote a joint letter concerning wages and working conditions to a supplier in Myanmar. Next to that, the member also cooperates in taking more preventive measures, such as organising training at shared suppliers in Vietnam and Myanmar in 2022.

Indicators on Improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	61%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2

Comment: In the past financial year, Schöffel has received ten audit reports. During the performance check, Schöffel could demonstrate with samples that up to two third of the CAP issues requiring improvement actions have been addressed. In the general process by the brand of addressing CAP findings, Schöffel collects factory feedback and proof of evidence for resolved findings. Regarding the sample checked, all three audits were in lead by another member. In all cases, the latest CAP was received, but not all proofs were filed with the brand during the performance check. For two of the audits, the brand's CSR manager partly supported the follow-up during on-site visits in Vietnam.

Recommendation: Schöffel is recommended to ensure the proof is shared with all brands in the case of a shared CAP follow-up.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	4	6	-2

Comment: Schöffel has identified some root causes of the CAP issues and discussed these with its suppliers. The member sees significant differences between its suppliers when identifying root causes and preventive actions, exemplified in the following: The member has implemented some preventive steps. One Vietnamese supplier is very proactive, remediated findings promptly and always suggests preventive measures. For example, a reoccurring training plan on internal grievances instead of a one-off training. Another Vietnamese supplier focuses on the improvement of the issue without preventive actions. A Chinese supplier with issues of blocked safety routes implemented both regular checks of all exits as well as internal training as prevention.

Recommendation: Fair Wear recommends Schöffel to translate its root cause analysis into concrete preventive actions and focus on suppliers which are following a reactive approach.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	Advanced	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	6	6	0

Comment: Schöffel has some suppliers where improvement or prevention steps are not needed. These cover 4% of the member's total FOB. The member is in regular contact to discuss developments regarding human rights. Schöffel regularly reviews changes to the risk situation. It has not included worker representatives or local unions in these discussions.

Recommendation: Schöffel is recommended to ensure worker representation/local unions (when appropriate) are included in discussions with factory management on possible human rights risks.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Intermediate	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	4	6	0

Comment: In the previous year, nine out of thirteen audits mentioned excessive overtime. Schöffel keeps an extensive overtime analysis for all audits, which includes root causes, corrective actions and remediation status. According to the member, peak seasons, production planning issues, missing management systems, limited awareness of labour law requirements, and late material deliveries are causes of excessive overtime at those nine suppliers. The member has taken action to address the root causes. In one case, excessive overtime was directly linked to Schöffel's orders at a Chinese supplier. The brand analysed and adjusted its planning to extend the production cycle and reduce overtime. At three Burmese suppliers, overtime policies were revised, and overtime record-keeping was improved. At a Vietnamese supplier, more workers were recruited to meet production targets. The local team in Vietnam has been trained to check time records in Vietnam and China. Schöffel could show that its efforts reduced excessive overtime at five suppliers through overtime records or follow-up audit reports.

Recommendation: Fair Wear recommends cooperating with other customers at the factory to increase leverage when mitigating excessive overtime. Fair Wear encourages Schöffel to integrate its overtime analysis into its general producer and factory CSR overview to keep all tools combined for better oversight.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Insufficient	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	-2	4	-2

Comment: The previous performance check included the following requirement: Schöffel is required to collaborate with its Vietnamese suppliers and find a solution for the workers who did not receive legal minimum wage during the months of lockdown (from July to October 2021). Schöffel conducted a Fair Wear audit at the supplier in 2022 to assess the issue. The brand had various discussions on the topic, including a personal meeting with the management in Vietnam (in April 2023). The brand decided not to focus on the payback of lost wages during lockdowns, as proposed by Fair Wear. The main reasons were a change in factory management, the difficult financial situation of the supplier, and the fact that the supplier followed government regulations. Two years after the lockdown, the factory is still only in the process of assessing the gap between the actual wage received and the minimum wage for each worker. Overall, the brand did not follow up sufficiently on the requirement. In addition, the remediation of one audit (November 2021) in China with issues of non-payment of legal minimum wage was reviewed in this performance check. The brand followed up thoroughly on the findings, and pay slips showed all workers were paid above the legal minimum wage. Nevertheless, to date, the wage comparison system is ineffective. Therefore, remediation is still ongoing.

In 2022, five audits and one complaint included findings regarding non-payment of legal minimum wage or legally required wage elements. Schöffel responded to these findings via exchange in CAPs and could show improvements. At a Burmese supplier, where workers on probation were paid below the minimum wage, the brand joined forces and addressed the issue in a joint brand letter. An audit verified payment of legal minimum wage for all workers. In addition, all three CAPs of Vietnamese suppliers showed proof of remediation and payment of legal minimum wage. The fourth CAP from a Vietnamese supplier is partly remediated. The finding that allowances were not paid as legally required was remediated and verified. One complaint on wages (see also indicator 3.14) was resolved, and outstanding wages were paid. One audit reported from a Vietnamese audit was partly remediated.

Recommendation: Fair Wear strongly recommends collecting evidence of remediation for the cases of payments below during lockdowns at the Vietnamese supplier.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Basic	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.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	2	6	0

Comment: Schöffel has an extensive overview of the wage levels at 26 production locations. Through its analysis, the brand knows which suppliers pay wages below living wage estimates considering mode wages of sewing workers. With two suppliers in Myanmar (accounting for 25% FOB), the brand had discussions about wages as here the gap to living wage estimated is significant. The member has yet to develop a systemic and time-bound approach to increase wages towards a living wage.

Recommendation: Fair Wear encourages Schöffel to discuss different strategies to work towards higher wages and develop a systemic and time-bound approach with suppliers. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship. Fair Wear encourages Schöffel to integrate its extensive wage analysis into its general producer and factory CSR overview to keep all tools combined for better oversight.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Basic	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	2	6	0

Comment: Schöffel has started to address the topic of living wage internally with the purchasing team. In 2022, in discussions on how wage increases could be financed, the purchasing team brought in the subject of exchange rates. The brand analysed the prices of 2022 for carry-over styles. The analysis showed that many suppliers benefited from the exchange rate fluctuations and got up to 20% more on some products than in previous years. In addition, Schöffel supports several suppliers in achieving high efficiency by having fixed lines with carry-over products for Schöffel only. Due to the high inflation in Ukraine, the brand increased prices to cover higher costs at the supplier end. The brand did not crosscheck if this led to higher wages for workers. The member has discussed wage increases with its factories and focused in 2022 on partners in Myanmar. Schöffel does not have a strategy to finance wage increases at its suppliers.

Recommendation: In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	31%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

Comment: An analysis based on audit data shows that wages at suppliers responsible for 31 % of Schöffel's FOB are above the Anker or the Wage Indicator living wage estimate comparing mode sewing workers' wages.

Recommendation: Schöffel is encouraged to work on increasing wages at more suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	Intermediate	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	2	4	-2

Comment: Schöffel received five complaints in the past financial year at its suppliers in Myanmar. The member actively responded to these complaints per Fair Wear's Complaints Procedure. Schöffel received three complaints from the same supplier in Myanmar. The first complaint concerning verbal abuse was resolved by training and ensuring worker representatives' reelection. In addition, as mentioned under indicator 3.5, the brand wrote a joint letter to emphasise the importance of remediation of the cases. The second complaint concerning safe and healthy working conditions is closed, and a process for work accidents was introduced. The last complaint is still under investigation and will be assessed in the next performance check. Schöffel involved its local technician in Myanmar to monitor the situation and to prevent similar complaints from occurring at its supplier. The two remaining complaints came from another supplier in Myanmar. One complaint regarding unpaid wages after resignation has been resolved.

The other complaint was filed after cases of child labour came to light at a factory during an assessment of labour standards initiated by another brand. The core of the complaint raised to the Fair Wear complaints helpline was the claim of unlawful termination, which was partially not grounded and partially not possible to conclude. Nevertheless, several measures for prevention were taken, such as reworking the process of issuing contracts and training workers on their rights in the context of termination and resignation. In addition, the risk of child labour was reported to Fair Wear. The brand reacted immediately to the risk of child labour and joined forces with another Fair Wear member and one non-member brand producing at the same factory. Extensive exchange with Fair Wear and an external expert organisation took place to ensure remediation. The remediation programme is running until 2025 and will be financed by the supplier, not by the member brand. However, the brands financed the supplier's enrollment in a third-party programme on age verification and HR training for employing young workers.

Recommendation: The member is recommended to support its suppliers financially in the ongoing remediation programme in Myanmar.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Basic	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	2	6	0

Comment: Schöffel has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers in training where this is part of the improvement or prevention programme. One supplier was enrolled in a WEP Basic training as workers were unaware of the Code of Labour Practise. Another supplier in Vietnam was enrolled in a WEP Communications training as internal grievance mechanisms are considered as not functioning. One supplier in Vietnam was enrolled in a WEP Basic as a preventive measure. At one Vietnamese supplier, WEP Basic was recommended in the CAP but only took place in February 2023, which is still counted as an exception. In addition, Schöffel enrolled its Burmese suppliers in several trainings and workshops for improvement and prevention.

Recommendation: Schöffel is recommended to implement training for all factories where this is part of its improvement and/or prevention programme.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Advanced	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	6	6	0

Comment: Schöffel has a standard procedure for training follow-up. Training reports are forwarded to the suppliers with the advice to share with the working committee and the learnings with the remaining workers and factory management. After the factories were trained, Schöffel discussed training outcomes and further needs. The process was followed for the WEP Basic Programmes. The communication training requested for one supplier has not taken place yet (still in the planning phase). The member uses the training results as input for its human rights risk monitoring in its standard procedure. For example, at a Vietnamese supplier with an overall relatively low-risk level, the WEP Basic training took place as a prevention measure to strengthen the awareness of COLP. Therefore, it remained at a low-risk level after the training.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	Intermediate	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0

Comment: Schöffel's human rights risk monitoring includes a responsible exit strategy. The member stopped with two suppliers in Indonesia and Vietnam in the past financial year. The member followed the steps in the responsible exit strategy at one supplier. In another case, the collaboration was terminated by the supplier. Schöffel did not discuss the responsible exit strategy with its suppliers beforehand.

Recommendation: Schöffel could include the responsible exit strategy as part of its suppliers' agreement or contract.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

Comment: Schöffel does not undertake activities related to human rights that go beyond Fair Wear's scope.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 12

Indicators on Communication, transparency and evaluation

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

Comment: Schöffel communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership, such as social media channels, blogs, Schöffel magazine, brochures, lookbooks, press releases, internal training manuals, external representations, trade shows and consumer events. Products of Schöffel Sport also use a hangtag on garments with the Fair Wear Logo. The member actively spreads the Fair Wear message.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: Schöffel does not sell external brands.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Social report is submitted to Fair Wear and is published on the member company's website.	Advanced	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	4	4	0

Comment: Schöffel has submitted two social reports, one per brand (Schöffel Sport and Schöffel Pro), to Fair Wear and has also published both reports on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	2	4	0

Comment: Schöffel published its social reports on its website, which include factory-level data and remediation results. The factory-level data Schöffel included are audit findings, complaints, and the latest remediation progress. In addition, the member also publishes its complete factory list for all CMT suppliers. Schöffel has yet to disclose its time-bound improvement plans for each supplier.

Recommendation: Fair Wear recommends Schöffel to include suppliers of support processes in the factory list and publish time-bound plans for its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

Comment: Schöffel has a general system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. In its evaluation system, the member does not yet include triangulated information from external sources, such as worker feedback.

Recommendation: The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Insufficient	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 should show documentation related to the specific requirements made in the previous Brand Performance Check.	-2	4	-2

Comment: The previous performance check included the following requirement: Schöffel is required to collaborate with its Vietnamese suppliers and find a solution for the workers who did not receive legal minimum wage during the months of lockdown (from July to October 2021). Schöffel conducted a Fair Wear audit at the supplier in 2022 to assess the issue. The brand had various discussions on the topic, including a personal meeting with the management in Vietnam (in April 2023). The brand decided not to focus on the payback of lost wages during lockdowns, as proposed by Fair Wear. The main reasons were a change in factory management, the difficult financial situation of the supplier, and the fact that the supplier followed government regulations. Two years after the lockdown, the factory is still only in the process of assessing the gap between the actual wage received and the minimum wage for each worker. Overall, the brand did not follow up sufficiently on the requirement.

Recommendation: Schöffel is strongly recommended to address the requirements that are still outstanding.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: **Not applicable**

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: **Yes**

Comments: In 2022, Peter Schöffel gave a lecture, "Gemeinsam. Nachhaltig. In die Zukunft", as part of "Dein Winter. Your Sport. Summit" in Berchtesgaden, Germany. Furthermore, Schöffel joined a business coalition for a strong supply chain act. The initiator of that coalition was the Business and Human Rights Centre.

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: **Yes**

Comments: There have been events and company visits at Schöffel in 2022 about sustainability. Fair Wear was introduced as part of the company presentation. In addition, a lecture with a quiz in the department took place.

Recommendations to Fair Wear

Schöffel would appreciate it if existing guidance and tools would be adapted or new ones invented to further support brands in keeping up with the enhanced requirements of Fair Wear. For instance, it would be very helpful if collecting gender-sensitive data such as wage levels per gender could be included in audits and specific training on gender would be available since gender became a specific focus topic of Fair Wear.

Schöffel would like to have more information on the broader stakeholder network of Fair Wear to find other training organisations which Fair Wear recognises. The brand would also like more support concerning regional living wage benchmarks and a regular update for all Fair Wear countries.

Brand Performance Check details

Date of Brand Performance Check: **17-07-2023**

Conducted by: **Julia Krämer**

Interviews with: **Marco Tenace** (Director of Quality & Corporate Responsibility)

Mirjam Krönert (Corporate Responsibility Manager)

Martina Beckmann (Director of Procurement Schöffel Sport)

Mathias Noack (Director Procurement and Supply Chain Schöffel PRO)

Miriam Lang (Procurement Manager Schöffel Sport)

Gabi Gorkos (Sales & Operations Planning-Coordination Manager)

Peter Schöffel (CEO & Owner)