

# Brand Performance Check Schöffel GmbH & Co. KG

This report covers the evaluation period 01-01-2023 to 31-12-2023

#### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.

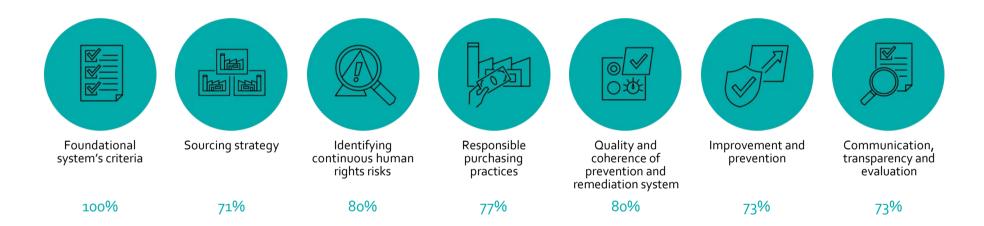


#### **Scoring overview**

Total score: 156
Possible score: 208

Benchmarking Score: 75

Performance Benchmarking Category: Leader



#### **Summary:**

Schöffel has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 75, the member is placed in Leader category.

Schöffel's sourcing strategy focuses on maintaining long-term relationships. The brand has a strict onboarding process and a thorough due diligence process for new suppliers. The member has established a structured approach to communication regarding critical audit findings and complaints. Regular meetings involving the director, Corporate Responsibility (CR), operations, and purchasing teams ensure updates are consistently shared. Weekly meetings are held alongside larger group meetings every two months to present findings and discuss follow-up actions. In the past year, Schöffel faced significant challenges, particularly with the transition away from Myanmar as a production country. This move required identifying responsible alternatives and establishing sourcing in Bangladesh, supported by a reliable supplier base and skilled technicians.

The member brand conducts risk scoping on country and supplier level for Tier suppliers. The risk scoping covers the risks of country, sector, business model, sourcing model, and product levels, 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 member keeps extensive overviews on freedom of association, gender, wages, overtime and internal complaints mechanisms per production location.

Schöffel sources from 3 production locations in Myanmar with a production volume of 26% compared to 29% of its total FOB in 2022. Following Fair Wear's Policy on Business in Myanmar, the member company is exiting. So far, it has been shown to employ a responsible exit strategy by withdrawing gradually and responsibly from Myanmar and intensifying its due diligence efforts to ensure compliance with labour standards. The rationale for staying in Myanmar lies in the commitment of its partners to uphold high social standards, as confirmed through regular audits, site visits, and collaboration with third-party organizations. Despite Fair Wear's general expectation that member brands start disengagement from Myanmar, Schöffel remained in Myanmar due to its significant impact on local workers and the broader supply chain and in 2023 decided to withdraw gradually and responsibly from Myanmar.

Factory assessments show that suppliers responsible for 30% of Schöffel's FOB pay a living wage estimate, considering the mode wage of sewing workers. The member has discussed wage increases mainly with partners in Myanmar. Schöffel does not yet have a strategy to finance wage increases at its suppliers.

Schöffel sources from 4 suppliers in Bangladesh, with a production volume of 1% of its total FOB. The member company has signed the International Accord.

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 turnover of external brands resold o%

Member of other MSI's/Organisations Partnership for Sustainable Textiles, Bluesign, GOTS, EOG, International Accord - Bangladesh and

EuroCham Myanmar; MADE in Myanmar

Number of complaints received last financial year 3

#### **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	17	30.77%
Myanmar	7	25.86%
China	10	17.76%
Ethiopia	1	9.93%
Ukraine	1	6.71%
Indonesia	2	3.53%
Cambodia	2	1.57%
Bangladesh	8	1.03%
Türkiye	2	0.78%
Albania	1	0.71%
Portugal	3	0.56%
Germany	2	0.55%
Italy	1	0.16%
Latvia	2	0.06%

#### **Layer 1 Foundational system's criteria**

**Possible Points: 8** 

**Earned Points: 8** 

- 1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: Yes
- 1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: Yes
- 1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: 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.:
- 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 85% of production locations internally through Fair Wear's information management system.

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

**Comment:** Schöffel discloses 85% of production locations externally on Fair Wear's transparency portal.

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: 68** 

#### **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.	Advanced	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.	6	6	0

Comment: Schöffel has a written sourcing strategy addressing influencing labour conditions. The member has 62 production locations in 14 countries, including support processes such as printing or embroidery. 79% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. This is an improvement compared to the previous year (58%). 9% of the production volume comes from suppliers where Schöffel buys less than 2% of its total FOB (compared to 6% in the previous year). The member company consolidates its supplier base to the extend possible but has made some exceptions in 2023. The member added more tail-end suppliers because production from Myanmar is allocated to Bangladesh, and several new factories were onboarded in 2023. The member's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other buyers. 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 and belts.

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. 85% 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.

**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 risk factors for country, sector, business model, sourcing model and product level. This extensive analysis utilises country studies, risk-checking tools, and stakeholder insights to identify potential risks at the country level, encompassing all eight labour standards. The focus is mainly on sector-specific risks within the textile and clothing industry across all procurement countries. Additionally, risks related to Schöffel's business and procurement model are considered. The brand recognises licensee cooperation as a business model risk within its assessment. Product-related risks have also been examined, including product range, materials, and production processes. The member has accurately evaluated the impact and prevalence of these risks, and the analysis includes a gender perspective, primarily focusing on issues such as discrimination, sexual harassment, and gender-based violence. However, besides data from Fair Wear assessments, Schöffel has not yet integrated feedback from workers and suppliers into its risk analysis. Based on the findings from its risk assessment, the brand has adjusted its sourcing strategy, though it does not specify a preference for countries where workers can freely form or join trade unions and engage in collective bargaining. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. Despite Fair Wear's general expectation that member brands start disengagement from Myanmar, Schöffel remained in Myanmar due to its significant impact on local workers and the broader supply chain and decided to withdraw gradually and responsibly from Myanmar. The company works with two long-term partners (Taiwanese and Korean) across three factories, having carefully selected them in 2017 through an extensive onboarding process. In response to the coup, Schöffel intensified its due diligence efforts to ensure compliance with labour standards. The rationale for staying in Myanmar lies in the commitment of its partners to uphold high social standards, as confirmed through regular audits, site visits, and collaboration with thirdparty organisations. In 2023, Schöffel made the decision to end the business relationship with one of the production partners. Schöffel has identified the majority of the risks of Freedom of Association (FoA) in China and the limitations of only one legally recognised trade union, and therefore Schöffel focuses on internal worker representation in this regard. Member has identified the risks to FoA in Vietnam, where the state-controlled union limits independent worker organization. While social dialogue occurs in many factories, it is not always fully compliant with legal procedures. Schöffel sources from four suppliers in Bangladesh, responsible for 1% of the member's total FOB. Schöffel is a signatory of the International Accord for Bangladesh, which addresses the high risks of occupational health and safety in this country and at its suppliers.

**Recommendation:** Fair Wear strongly recommends Schöffel to privilege countries where workers can freely form or join a trade union or bargain collectively and make this explicit in its sourcing strategy. The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

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 five 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 and dialogue with the management, the Fair Wear questionnaire, consultation of relevant stakeholders and other Fair Wear members, review of external audit reports and Corrective Actions Plans (CAP) follow-up where available. Visits of the member's Corporate Responsibility (CR) 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 CR. Schöfel will terminate the onboarding process if a supplier does not meet the basic requirement to improve human rights due diligence. Brand collects information from workers or stakeholders to inform sourcing decisions when available, such as using the existing audit reports, which include worker interviews. In 2023, reports were available for four of five new suppliers in Bangladesh and Vietnam. Not all of them include worker and stakeholder input.

**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 grievance mechanism, 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 five new suppliers in Bangladesh and Vietnam. The member shared information about Fair Wear's Code of Labour Practices (CoLP) and the complaints helpline within the first year of business. The Worker Information Sheet has been posted. Schöffel did not enrol any of the five suppliers in a Workplace Education Program (WEP) Basic within the first year of starting the business. However, some of them participated in FW training organised by other brands in previous years. 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.

Initially, WEP trainings were planned for two of the suppliers who have not been enrolled in any FW program before. These trainings were intended to occur in 2024 but were postponed due to the situation in Bangladesh during the summer of 2024.

**Recommendation:** Fair Wear recommends Schöffel to include a discussion with workers on how they would like to provide feedback and report grievances to the management regarding their working conditions in its onboarding sessions.

#### 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 assess human rights risks in its production locations.	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 has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tools and frequencies for most countries, enrolling suppliers in audits and organising on-site visits by Schöffel's Corporate Responsibility (CR), Quality, and Purchasing staff on a regular basis, while the documents received are checked across different departments, which help verify the current status of the production locations. For instance, the member assesses human rights risks in its production locations in Vietnam, Myanmar, and Bangladesh where HRDD is necessary through frequent factory visits by local Schöffel technicians for regular quality and compliance inspections for monitoring and corrective action plan (CAP) follow-up, and all suppliers are audited by an external third party in Myanmar.

In China, the approach has included frequent meetings with top management to discuss Corporate Responsibility (CR) topics, assessments, and training in 2023 and 2024, and an onsite visit planned for April 2024. In Cambodia, activities included an assessment in 2023 and a joint follow-up with another brand. In Ethiopia, Schöffel conducted an assessment in 2023, several on-site visits by CR staff in 2023 and 2024, a joint letter to and meetings with its supplier's top management, and a pilot project on strengthening worker representation together with GIZ in 2024, with plans to scale this project in 2025. In Türkiye, the efforts included a Factory Dialogue Module in 2023, a full assessment in September 2024 accompanied by CR staff, and collaboration with other sourcing brands regarding training and follow-up.

All audits and assessments commissioned by Schöffel include interviews with workers and management to ensure a comprehensive understanding of each site's conditions. Another focus is on issues like working hours, pay, and freedom of association, with Schöffel actively engaging with suppliers to address these challenges. Schöffel has an appropriate system for evaluating factory risk assessments to identify risks at Bangladeshi suppliers and has access to assessments of RMG Sustainability Council (RSC). The member is a signatory of the International Accord.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process 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 to some extent. The risks identified include systemic violations of the right to freedom of association at the country level, non-democratically elected worker representatives, and the presence of yellow unions. Schöffel utilises this information to gauge the risks associated with its suppliers and to determine how to engage them on these issues. In Myanmar and Vietnam, local technicians communicate regularly with workers and occasionally with worker representatives and trade unions. Schöffel has implemented supplier-level monitoring through a questionnaire designed to assess and understand risks among its suppliers. It is aware of which suppliers have established trade unions and collective bargaining agreements (CBAs). Additionally, audit reports are employed to map supplier-level risks and identify areas for improvement.

**Recommendation:** Schöffel should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, 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 it understands the gender risks for its sourcing countries and identify discrimination, sexual harassment and gender-based violence as important risks prevalent in Cambodia, Myanmar, China and Türkiye. Additionally, Schöffel actively collects gender data per factory. The data is comprised of the percentage of female workers, supervisors, and trade union and/or workers representatives; gender-related issues previously reported; the status of written policies for non-discrimination, and anti-harassment; maternity rights and benefits; and paternity rights. This information is collected through a questionnaire filled out by the suppliers. The member has yet to analyse the collected gender-disaggregated data at the factory and country levels.

**Recommendation:** Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

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.	Advanced	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.	4	4	0

Comment: Schöffel has a strong and systematic evaluation system for assessing suppliers' human rights performance. The brand has a strong and systematic evaluation system for assessing suppliers' human rights performance that incorporates a structured scoring system, which is applied during performance assessments. Various criteria, including quality, price, delivery, product development, and CR, are considered, each with different weightings, with CR receiving the highest importance. This includes aspects such as the supplier's follow-up on CAP and complaint resolution. The brand collaborates with suppliers to promote continuous improvement; however, if a supplier fails to demonstrate effort or willingness to improve over a specified period, the brand will terminate the business relationship. Schöffel proactively shares the evaluation's outcome with its suppliers and discusses it where relevant. The member brand has not yet shared the evaluation's outcome with its suppliers' worker representatives. Additionally, the brand has not yet gathered information regarding the human rights performance of the production locations used by its licensees.

**Recommendation:** Fair Wear recommends that Schöffel share and discuss the outcome of the supplier evaluation with its supplier's worker representatives. Schöffel is strongly recommended to evaluate the human rights performance of suppliers used by its licensees or partners in design collaborations.

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 location subcontractors in the database. For Schöffel, disclosure of supplier details, including subcontractors, is part of the agreement the company signs with each supplier. Information is cross-referenced with sources such as factory visits, audit results, supplier discussions, and production process reviews. The member prevents unauthorized subcontracting by visiting suppliers during production and regularly checking documents like the Fair Wear questionnaire, supplier register, financial records, and inspection reports. Local technicians are trained to monitor subcontracting onsite. Schöffel addresses subcontracting in its licensing agreements.

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 inperson visits by the brand's technicians, especially at the strategic partners in Myanmar and Vietnam, reduce the risk.

#### **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 CoLP, it does not support the implementation of human rights due diligence. These contracts do not yet mention the shared responsibilities of CoLP implementation. The brand is currently reworking the framework contracts.

**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:** Schöffel is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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 its 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: Schöffel actively shares relevant CR (Corporate Responsibility) information with other departments. There is an active interchange of information between CR and other departments to enable coherent and responsible business practices. This is done through weekly interdepartmental meetings to discuss operational issues where CR-related updates are shared, monthly meetings between the CR and purchasing departments, and bi-monthly meetings of the sourcing group including top management, purchasing, logistics, CR, and quality. 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 uses a fully digital integrated system for production forecasting, planning, and delivery through an internal ERP data system. This digitization has improved efficiency, lead times, and transparency. Orders are consolidated and placed by season, adhering to factory-specific lead times, with regular quality control visits from Schöffel technicians. Suppliers are informed that production planning must be achievable during regular hours, and forecasts are shared four months prior to order placement. Never Out of Stock (NOS) products are produced in the low season for flexible delivery times. Production timelines are collaboratively calculated, and Schöffel monitors factory capacities using datasheets to analyse peak and low seasons before placing orders.

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 has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Schöffel works with fact-based 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.

However, there are exceptions with two new suppliers who are currently not willing to use Schöffel's cost sheet due to hesitance in providing this level of transparency related to prices. To address this, Schöffel conducted a plausibility check via wage analysis to verify that wage levels support at least legal minimum wage payment.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding HRDD and 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's sourcing model purposely excludes the use of sourcing intermediaries.

#### **Layer 3 Prevention, mitigation and remediation**

**Possible Points: 96** 

**Earned Points: 72** 

### Indicators on the quality and coherence of a members' 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 risk prioritisation and creates subsequent action plans.	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 78%. 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. In 2023, Schöffel made the decision to withdraw gradually from Myanmar. Each quarter, Schöffel hands in a Myanmar progress report per factory, covering the following focus areas: FoA and access to remedy, grievance mechanisms, forced labour, economic linkages to the military, security risks, addressing salient risks (OT, wages, unfair dismissal), credible information and reporting, the action plans have been detailed. Schöffel is a signatory of the International Accord, and all suppliers in Bangladesh are covered by the RSC. The member company closely follows up on the remediation process at its suppliers and works on joint prevention, mitigation, and remediation with the RSC and signatories of the International Accord.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Intermediate	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.	4	6	o

**Comment:** As described under indicator 2.9, Schöffel collects gender-disaggregated data for all suppliers. In 2023, actively collect gender data per factory. The data is comprised of the percentage of female workers, supervisors, and trade union/workers representatives; gender-related issues previously reported; the status of written policies for non-discrimination, and anti-harassment; maternity rights and benefits; and paternity rights. This information is collected through a questionnaire filled out by the suppliers. If gender-related issues are found during audits or complaints, these are followed up and integrated into the improvement plans.

**Recommendation:** Fair Wear recommends Schöffel to make the gender lens in its action plans more comprehensive.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Advanced	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.	6	6	0

Comment: Schöffel included comprehensive steps to encourage FoA and effective social dialogue in most action plans. These steps include the implementation of the following activities: social dialogue training and strengthening Workplace Coordination Committees (WCCs) with the support of SMART Factories Programme (Smart) and Multi-Stakeholder Alliance for Decent Employment (MADE) in Myanmar; FW training on a Factory dialogue module conducted in one factory in Türkiye for both management and workers; participation in the pilot project on strengthening workers' representatives' leadership skills, supported by German Corporation for International Cooperation (GIZ) office in Ethiopia; and discussion to participate in the Multi-Company Collective Bargaining project (MCCBA) in Vietnam.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Basic	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.	2	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 evaluates each supplier in high-risk countries to assess the effectiveness of their internal grievance mechanisms. Follow-up action has been identified for some of them. Schöffel responds when the mechanism is reported ineffective in a CAP or complaint. The member company has specifically targeted factories identified during assessments as high-risk or those with complaint mechanisms requiring improvement. Schöffel has yet to involve suppliers and worker representatives in the assessment of the factory-level grievance mechanism and share the outcomes for further discussion.

**Recommendation:** Fair Wear recommends Schöffel to always involve suppliers and worker representatives in the assessment of the factory-level grievance mechanism and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved. Fair Wear recommends Schöffel to ensure that the evaluation of factory-level grievance mechanisms of its suppliers is systematically considered in purchasing decisions.

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. Schöffel can demonstrate it works on joint prevention, mitigation and remediation with the RSC and signatories of the International Accord. There is increased collaboration with other brands in Myanmar and Ethiopia to strengthen social dialogue and improve the quality of working conditions.

#### Indicators on implementation: improvement and prevention



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	78%	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.	6	6	-2

**Comment:** In the past financial year, Schöffel has received 11 factory assessment reports. During the performance check, Schöffel could demonstrate with samples that up to two-thirds of the CAP issues requiring improvement actions have been addressed. Schöffel collects factory feedback and proof of evidence for resolved findings while addressing CAP findings. Schöffel has put sufficient effort in improving the lives of workers at its suppliers in Myanmar. The member brand has worked with its suppliers in Myanmar to work on CAP plan findings.

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 has started to develop some preventive steps addressing these root causes and, in the case of Bangladesh suppliers, recognises the positive effect of RSC, which supports identifying and resolving the risks and harms. In addition, one supplier, which operates multiple factories (several of which are used by Schöffel), appointed a CR manager to improve working conditions across their production facilities. Schöffel is addressing the root causes of findings at its Myanmar suppliers with the support of Smart and MADE.

**Recommendation:** Fair Wear recommends Schöffel to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

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 action plan is needed.	Intermediate	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.	4	6	0

**Comment:** Schöffel has some suppliers for whom action plans are not needed. These cover 1.33% of the member's total FOB and cover suppliers in Germany, Latvia, Italy and Portugal. The member is in regular contact to discuss human rights developments. Schöffel regularly reviews changes to the risk situation. The member brand has not yet 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, three out of 11 audits mentioned five findings for 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, and limited awareness of labour law requirements are causes of excessive overtime at those three suppliers. The member has taken action to address the root causes. With the Etiophian supplier, the continuous communication was focused on improving the production quality to reduce overtime.

**Recommendation:** Fair Wear recommends cooperating with other customers at the factory to increase leverage when mitigating excessive overtime.

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.	Advanced	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.	4	4	-2

**Comment:** In 2023, four audits and one complaint included findings regarding non-payment of the legal minimum wage or legally required wage elements. Schöffel responded to these findings via exchange in CAPs and could show improvements. The corrective action plans were implemented at two suppliers from China and Vietnam, and the remaining are in progress and in the validation process.

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.	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.	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.	4	6	0

**Comment:** Schöffel has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Schöffel has an extensive overview of the wage levels at all production locations, and the payment above the living wage estimate of mode sewing / average worker standard wage plus benefits without overtime (OT) is achieved in almost 30% of the supplier's FOB. Through its analysis, the brand knows which suppliers pay wages below the living wage estimates, considering the mode wages of sewing workers. The CR team held regular meetings with all departments to discuss the findings and challenges the supply chain faces by checking price levels, improving supply chain efficiencies, and cooperating with other brands.

**Recommendation:** Fair Wear encourages Schöffel to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. 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.

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 wages internally by assessing the wage situation across the whole supply chain using the fact-based costing method. At the moment, there is no clear strategy for financing the wage increase, but continuous analysis of all the data is being conducted. Some production partners are committed to this process and are setting prices that ensure workers receive a living wage.

**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.	30%	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 30% of Schöffel's FOB are above the Anker or the Wage Indicator living wage estimate comparing mode sewing workers' wages.

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

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's Access to Remedy Policy.	Advanced	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.	4	4	-2

Comment: Schöffel received three complaints in the past financial year at its suppliers in Myanmar. The member actively responded to these complaints per Fair Wear's Complaints Procedure. All three were related to the behaviour of the supervisors and workers lack of knowledge of their rights. The first complaint was resolved by providing harassment and abuse training for the factory supervisors. The second complaint involved forced overtime. Training was provided to the supervisors on working hours and overtime, the voluntary OT and that workers are free to leave the workspace. Schöffel and the other brand sourcing and the supplier took action immediately, and the case was resolved with the training and annual leave payment records submitted to Fair Wear for review. Fair Wear cross-checked with the complainants, who confirmed that the issues had been resolved.

**Recommendation:** Schöffel could involve worker representatives in the remediation of complaints. The member is recommended to take steps to prevent similar complaints from occurring at its supplier/ in its supply chain.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Intermediate	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or genderbased violence, where factorylevel transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	4	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 that is part of the improvement or prevention programme. Three Vietnamese suppliers were enrolled in WEP Basic training, another Turkish supplier was onboarded in the Factory Dialogue Module, and a Chinese supplier was enrolled in the onboarding training.

**Recommendation:** The member is recommended to implement training for all factories where this is part of its action plan.

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 followed up on all training results by structured follow-up with other brands sourcing from the supplier. 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 and included this information in the risk monitoring. The process was followed for the Fair Wear training programmes. The member uses the training results as input for its human rights risk monitoring in its standard procedure.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights due diligence system includes a responsible exit strategy.	Advanced	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.	4	4	0

**Comment:** Schöffel's human rights risk monitoring includes a responsible exit strategy. In the past financial year, the member stopped with five suppliers in China, Latvia and Türkiye. The member followed the steps in the responsible exit strategy at all suppliers.

**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

# Layer 4 External communication, outreach, learning, and evaluation

**Possible Points: 22** 

**Earned Points: 16** 

#### Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	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. 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 multistakeholder 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 Human rights due diligence reporting 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 its social report, which Fair Wear approved. Schöffel has also published the report on its website. Schöffel has provided sufficient information in its social report on how it conducts human rights due diligence in Myanmar.

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 and support process subcontractors.

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.	Intermediate	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 two requirements:

- 1. Schöffel should evaluate its contracts to ensure that they do not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct. The new contract is being drafted, and it is expected to be completed and signed by all suppliers in 2025.
- 2. Schöffel needs to evaluate the human rights performance of all its suppliers systematically, including the suppliers exclusively producing for Schöffel Pro. This requirement is completed and the suppliers producing for Schöffel Pro are evaluated systematicaly.

## **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 2023, Schöffel signed a joint company letter on legal minimum wage increase to the Prime Minister of Bangladesh.

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

### **Recommendations to Fair Wear**

Schöffel appreciates the alignment with the OECD guidance, however, asks Fair Wear not to lose their pragmatic approach, which they were known for. In context of the upcoming legislation, Schöffel wishes for more clear guidance and further alignment of Fair Wear requirements (e.g. considering reporting deadlines).

#### **Brand Performance Check details**

Date of Brand Performance Check: 21-10-2024

Conducted by: Aleksandar Stamboliev

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)

Philipp Süß (Purchasing Manager Schöffel SPORT)

Gabi Gorkos (Manager Supply Planning)

Georg Kaiser (Executive Vice President Operations)