



# **Brand Performance Check**

## **Hakro GmbH**

**Publication date: May 2022**

This report covers the evaluation period 01-01-2021 to 31-12-2021

## About the Brand Performance Check

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

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

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

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

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

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

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

# Brand Performance Check Overview

## Hakro GmbH

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

Member company information	
Headquarters:	Schrozberg , Germany
Member since:	2021-01-01
Product types:	Workwear, Outdoor
Production in countries where Fair Wear is active:	Bangladesh, Bulgaria, China, Turkey
Production in other countries:	Republic of Moldova, People's Democratic Republic of Laos, Cambodia,
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	73%
Benchmarking score	60
Category	Good

## Summary:

Hakro has shown progress and met most of Fair Wears' performance requirements. In its first year of membership, the member obtained 60 points which is well beyond the required points for first-year membership. Therefore, Hakro is placed in the 'Good'-category. In total, Hakro monitored 73% of its production volume, which exceeds the threshold for first-year members. The brand had also planned to audit its Lao suppliers but had to postpone it to 2022 due to the COVID-19 pandemic.

## Corona Addendum:

In 2021, Hakro recovered well from the COVID-19 pandemic, resulting in significant growth. This also meant that orders were secure for its production partners and that the brand had to look for additional production capacity with its partners. Hakro has a strong partnership model with its strategic suppliers that cover most of its production volume.

During the COVID-19 pandemic, the brand was in regular dialogue with its supplier on production planning, prices and working conditions. The brand exclusively sells Never-Out-of-Stock-items to exclusive retailers. It also has a large warehouse that enabled the brand flexibility towards its production partners to plan production and the delivery of products. It has short payment terms for all its suppliers (within days after receipt of the invoice), which supports them to maintain a steady cash flow. The member also launched its IMPACT programme, an audit and remediation programme. Most of its main suppliers were audited in 2021, and the brand and suppliers made good efforts to improve working conditions. Hakro also set up its risk management tool, which links country, product and supplier-specific risks.

In its first year of membership, the brand mainly focused on setting up its systems and creating internal awareness. It was aware of COVID-19 specific risks, such as loss of jobs and wages, and discussed these risks with suppliers but did not always make use of additional monitoring tools to verify whether legal minimum wages were paid. Therefore, Fair Wear requires Hakro to more actively follow up with its suppliers to identify issues related to loss of jobs and wages and worker involvement in case of factory closures due to lockdowns.

## Performance Category Overview

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

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

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

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

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

# 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	100%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

**Comment:** Hakro sources from eleven production locations. The member has significant leverage at most of the factories. At three suppliers, the brand is (nearly) the only customer. This gives the brand high leverage at suppliers to collaborate on improving working conditions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	1%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	3	4	0

**Comment:** At two Chinese suppliers and one Lao supplier, Hakro sources less than 2% of its production volume. These suppliers provide specific products, such as socks. The brand aims to further shorten its supply chain.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	60%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

**Comment:** Hakro established long-term partnerships with most of its suppliers. Considering its business model in which stability is key, the brand focuses on long-term relationships. Its Turkish supplier, with whom Hakro has been working with for 20 years already, opened a new facility in 2018. This resulted in the fact that this production location is not yet calculated towards this indicator.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

**Comment:** The brand sent out and received the questionnaires of all its suppliers in 2021. One supplier where a very small order was placed (<1% of its production volume) did not return the questionnaire. Hakro decided not to further pursue this due to the ending relationship with the supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

**Comment:** Hakro has done an extensive country-risk analysis in which it analysed and collected country, sector and partner-specific risks. It collects risk information from Fair Wear country information, the CSR risk checker and other sources. In a comprehensive excel, it keeps track of these risks and links them to supplier-specific risks. This document is updated once a year. This risk assessment is available to and regularly discussed with all staff working with suppliers, but is mainly used by CSR staff. These risks and issues feed into its decision-making processes. In 2021, no new suppliers were added.

Furthermore, together with Fair Wear-member OLYMP, the brand set up its iMPACT programme that consists of the brands' own audits. The brands can easily adjust the audits to country or supplier-specific risks. In total, five out of its eleven suppliers were audited last year. The audits at its two Lao suppliers had to be postponed to 2022 due to several lockdowns and factory closures. For factories that were not audited by the brand, the member collected external audit reports.

The CEO and the CSR team were in constant dialogue with its suppliers about issues related to COVID-19. This dialogue was often done informally between the CEO and the production partners. Besides its audits, the brand made use of local Hakro-staff in Turkey and its agent to collect more information on risks and issues at factories. The member also sent out a COVID-19 questionnaire that included questions on OHS, lay-offs and lost wages. The factories indicated that there were no or little issues. The brand approached its factories in a very supportive way, asking them what type of support they would need. The factories indicated to the brand that no additional support was needed.

However, its two factories in Laos had to temporarily close due to lockdowns, while its Turkish supplier had a significantly reduced workforce due to illness of workers for a specific period in 2021 posing a significant risk to workers' jobs, wages and OHS. Besides the questionnaire and regular discussions by the CEO, the brand did not make use of additional monitoring tools to check for these COVID-19 specific-risks.

**Recommendation:** Fair Wear recommends Hakro to systematically document the outcomes of the dialogue between the CEO and its production partners and ask more detailed questions about specific risks to its suppliers. Issues around working conditions and proposed measures should be incorporated into its remediation plans to make it possible for the CEO and CSR team to actively track, monitor and evaluate progress. The member could strengthen the internal integration of its risk assessment and follow up by improving the feedback loop between the CEO, buyers and the CSR team.

Furthermore, Fair Wear recommends Hakro to regularly update its risk assessment throughout the year and to ensure that risks are easily available and accessible to staff beyond the CSR team. The brand can also strengthen the link between its risks assessment and its own audits to adapt its audits even more to specific risks, such as COVID-19 risks and lockdowns.

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

**Comment:** Hakro has strong, strategic and long-term partnerships with almost all of its eleven suppliers. The brand has an annual evaluation of its suppliers which consists of price, quality, delivery and CSR. Together with the Purchasing, Quality and CSR departments, suppliers are evaluated. The outcomes of these evaluations are not yet discussed with suppliers. The performance of suppliers on improvements of working conditions is included in the decision-making processes of the brand. Its strategic suppliers are eager to improve and the member provides support where needed. However, based on the risks specific to China and the performance of its Chinese suppliers, the brand is planning to phase out these suppliers.

Switching orders between production locations is not an option due to its limited supply chain. The brand has not yet developed specific incentives which fit its business model. However, together with its Bangladeshi supplier, the brand set up a health care programme for the workers and has an annual celebration in which rice packages are handed out to support and stimulate the factory and the workers.

During the COVID-19 pandemic, the brand did not cancel or postpone any orders. Delays from the production side were accepted. Hakro did not stop relationships with any of its suppliers.

**Recommendation:** Fair Wear recommends Hakro to develop more specific key performance indicators on which it evaluates its suppliers. Furthermore, we recommend the brand to discuss the outcome of the evaluation with its suppliers. Despite the fact that the suppliers are willing to improve working conditions, the brand could develop incentives that are specific and fitting to its supply chain for more complex issues such as living wages. Considering its partnership model, we encourage Hakro to develop a two-way evaluation together with its suppliers, also allowing its suppliers to provide feedback on the purchasing practices of the brand.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** Hakro only sells Never-Out-of-Stock-items (NOS) and does not have seasonal products. In Germany, the member has a warehouse where it can store up to 6.000.000 pieces. Its customers are retailers, while the brand itself does not participate in public tenders. At three suppliers, the brand is (nearly) the only customer.

New products and designs are jointly developed with its suppliers. In a joint production planning meeting with its strategic suppliers (October latest), the brand and suppliers plan the monthly capacities for the next year in pieces. These forecasts are calculated on previous sales and expected market development and growth. The orders for a particular product are provided six to ten months in advance of the agreed delivery date. However, this can result in over- or underbooking of factory capacity for a specific month. The brand and supplier then discuss which products need to shift and in which way to ensure the requested capacity is filled. With its other suppliers, the brand engages with the agent to reserve factory capacity a year in advance. The brand discusses production planning with the agent to ensure that these factories are also not over- or underbooked.

The COVID-19 pandemic (country lockdowns or illness of workers) and increasing demand from customers did result in challenges for production planning for the brand although most of the challenges could be faced due to the large number of products it has on stock. In case other measures had to be taken, the brand engaged with the factories to postpone delivery dates, use air freight and/or engage with its own customers to extend delivery lead times.

**Recommendation:** Fair Wear recommends the member to explore planning production in minutes instead of pieces to better assess the production capacity (and wage levels) of its suppliers. Furthermore, at suppliers where Hakro is not the only customer, Fair Wear recommends the member to learn more about production planning of these suppliers, for example on peak season, total available capacity, etc.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** At its main Turkish and Bangladeshi supplier, the iMPACT-programme audit found excessive overtime. In both cases, a root cause analysis was conducted. In Bangladesh, the supplier suffered from material delays (due to lockdowns) but did not communicate this to the brand and ask for delaying delivery. The member also assessed whether it could improve its own purchasing practices. The supplier and Hakro agreed to have more open and transparent communication. The brand re-emphasized the possibility to accept delays if communicated in advance.

At its Turkish supplier, overtime was caused by workers being ill from COVID-19. To also meet Hakro's request for more production capacity, the factory is expanding its workforce to cover for this issue.

At its Moldovian supplier, the recording of working hours was incomplete which was caused by of a lack communication between departments. The brand and supplier agreed on the correction of the time recording errors, the correct recording and payment of overtime, and the improvement of communication channels as remediation measures.

Hakro sources very small production volumes from its three Chinese suppliers. BSCI audit reports show that excessive overtime is a significant issue at these suppliers. Due to its low leverage, the brand is exploring to shift production to its Cambodian supplier.

**Recommendation:** Hakro could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, Hakro could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request. Fair Wear recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Insufficient	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.	0	4	0

**Comment:** As part of its partnership with its suppliers, Hakro asks for prices requested by its partners which it usually accepts or negotiates collaboratively. The brand does make a price estimate in advance. Furthermore, through its iMPACT programme audits, the member knows about the wage levels in its factories. However, the brand does not yet link these wage levels to the price estimate or the actual price. The audit reports at its suppliers where the brand is (nearly) the only customer, show that no legal minimum wage findings are found, which is an indication that prices are sufficient. However, the brand cannot demonstrate the link between wages and its prices at any of its suppliers.

Increased costs due to COVID-19 measures, material price increases or wage increases were discussed and accepted by the brand.

**Requirement:** Hakro needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

**Recommendation:** Fair Wear recommends Hakro to expand its knowledge of cost breakdowns of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices, for example by using the FairPrice app. The FairPrice app also enables suppliers to include any COVID-19 related costs. Hakro could consider offering training by a local representative on FairPrice to its suppliers. Such training is available in all Fair Wear countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

**Comment:** None of the audit reports the brand conducted or collected showed the non-payment of legal minimum wages.

However, the brand was aware of the lockdown in Laos (September - November) and the challenges the Turkish supplier was facing due to sick workers. The member was aware of local governmental packages to support suppliers and/or workers. The factories confirmed to the CEO of Hakro that they were able to pay legal minimum wages and did not need additional support from Hakro, which was also confirmed in the COVID-19 questionnaire. In Turkey, the brand has its own local team on-site. This team did not report about workers indicating lower wages or the non-payment of sick leave, although the responsibility to verify wage payments also mainly lies with the CSR team and the local team is not (yet) actively engaging workers on this topic, only factory management. The brand did not make use of audits and/or other additional monitoring tools to verify whether legal minimum wages and sick leave were actually paid in Laos and Turkey.

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

In the context of COVID-19, the member is expected to do its own analysis of the risks related to non-payment of minimum wage in its sourcing countries, and connect the risk (for example, long-term factory closure in a country) to its own suppliers. When suppliers indicate no problem in paying legal minimum wages while it is a high-risk area, the member is expected to request evidence of wages paid.

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

**Comment:** Hakro has different payment terms for several suppliers, ranging from two to thirty days after the supplier sent the invoice. In all cases, the payments are done before the delivery of the products. The brand did not pay late and did not ask for reduced prices or discounts.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** In its first year of membership, Hakro started to assess wage gaps between actual wages and living wage benchmarks. It focused on ensuring that its own audit methodology contained internationally recognised living wage benchmarks. For each country, it has at least one benchmark. At the five suppliers it audited, the brand has more detailed information on wages and living wage benchmarks. The brand is engaging with its factories on the topic of wages and living wages. The member has not yet conducted a detailed analysis on the root causes of the non-payment of living wages per supplier.

At its Bangladeshi factory, Hakro did want to support the garment workers through a significant annual bonus. However, factory management advised against this out of fear of repercussions from surrounding factory owners. They then decided to invest in a health care insurance and system for workers and to provide a joint annual celebration in which in-kind benefits, such as rice packages are handed out.

During the COVID-19 pandemic, factories indicated that they had not lowered wages nor did the brand find any increase of the wage gap.

**Recommendation:** Fair Wear recommends Hakro to conduct a root cause analysis of the non-payment of living wages at each supplier. Fair Wear encourages Hakro to involve worker representatives and local organisations in assessing root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

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

**Comment:** Hakro does not own any of the production locations it sources from.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** Although the brand is in dialogue with its suppliers on living wages, it has not yet defined target wages.

**Recommendation:** Fair Wear recommends Hakro to develop a strategy together with its suppliers to reach target wages. This should include the involvement of worker representatives and trade unions. Where worker representatives or trade unions are not present, the brand should explore different ways of including the voice of workers. It is advised that the strategy for how to finance wage increases is agreed upon by top management.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

**Comment:** There are no factories that meet the living wage benchmarks yet.

## Purchasing Practices

**Possible Points: 52**

**Earned Points: 25**

## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	73%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	First or second year member and tail-end monitoring requirements do not apply	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check		
Total monitoring threshold:	73%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The two CSR staff persons follow up on problems identified by the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Yes	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	0	0	-1

**Comment:** Together with Fair Wear-member OLYMP, Hakro has set up its own auditing system called the iMPACT-programme. This programme consists of tailor-made audits around which the brands focus their remediation efforts. The audits make use of a Worker Sentiment Survey, which is a mobile phone survey which covers 15 questions on plans to stay at the factory, the relationship with their supervisor, trust in grievance mechanisms, working hours and wages. Workers fill this in anonymously. In 2021, the brands have been in regular discussion with Fair Wear to align their methodology with Fair Wear's.

The audits meet Fair Wear's standards, although information on a range of topics, such as living wages are not sufficiently covered or integrated yet.

**Recommendation:** Fair Wear recommends Hakro to further align the iMPACT programme with Fair Wear's audit methodology.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** Hakro shares the audit report and remediation plans in a timely manner. After the brand shared the report, the factory is requested to respond and propose improvement timelines, after which this is discussed with the brand. Worker representatives are invited to participate in closing meetings of the audit, but do not yet receive the audit reports.

**Recommendation:** Fair Wear recommends Hakro to ensure that worker representatives receive a copy of the audit report in a language accessible to them. When following up on audit reports, it gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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

**Comment:** Hakro has a system in place to monitor and track the progress of its suppliers on issues that need to be remediated. Per supplier it keeps track of the progress made in its remediation plans. The member asks for evidence (photos, documents) to verify whether issues are remediated. Hakro has not yet made use of monitoring visits or verified through a second audit. In Turkey, its Hakro-team is involved in CAP follow up, although the main responsibility lies with the CSR department.

After one of its audits, a worker called Hakro to complain about working hours and verbal abuse of one the supervisors. The issue of working hours corresponded to the finding of the audit and the brand is working with the factory to remediate this. However, the supervisor could not be identified, as long-term workers in that particular department did not know the identity of the supervisor. The brand is engaging with the complainant to lodge the complaint through the Fair Wear complaints mechanism.

Hakro could show that its suppliers worked on a range of issues that were remediated. However, more complex issues such as living wages, Gender-Based violence and the inclusion of worker representatives remain open. During the COVID-19 pandemic, the brand identified that management was engaging with workers on COVID-19 related measures. However, Hakro did not check whether specific committees were started that decided on COVID-19 measures and included the involvement of workers.

**Recommendation:** Fair Wear also recommends Hakro to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings. Furthermore, we recommend Hakro to make use of additional verification tools, such as monitoring visits or a documents check by local staff, agents or its auditors.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** This indicator is not applicable over 2021 due to the COVID-19 pandemic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	N/A	3	0

**Comment:** Hakro aims to have all its suppliers audited through the iMPACT programme audits. The brand is aware of the risk of corruption in auditing, audits that do not meet the Fair Wear Code of Labour Practices and qualitatively bad audit reports. That is why it chose to set up its own programme. Hakro collects external audit reports to feed into its risk assessment for production locations but does not actively use them for CAP follow up. Therefore, this indicator is rated n/a.

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

**Comment:** Bangladesh:

Hakro signed the transitional Bangladesh Accord. The Bangladeshi factory it is sourcing from also falls under the Accord. Audits of the Accord show that the factory has remediated 95% of the issues found. The member checked whether the audit team had access to specific expertise on building and fire safety. The audit team does not yet have the expertise to identify GBV. Hakro is aware of the risk of Gender-Based Violence but has not yet taken steps to identify, prevent and remediate any of these issues at its Bangladeshi supplier.

Turkey:

Hakro works with two Turkish suppliers. The member shared the Fair Wear policy on Syrian migrants with its suppliers and discussed this with them. During the audits, no Syrian refugees were found. Neither were subcontractors found where Syrian migrants could be employed. Although Hakro did inform its suppliers, it did not actively raise awareness of these suppliers, for example through the WEP basic.

COVID-19:

In dialogue with its suppliers and through audits, the brand checked whether there was a loss of jobs and wages at suppliers. However, in case of lockdowns, the brand did not make use of additional monitoring tools afterwards to verify whether factories were paying at least the legal minimum wage. Through its audit, the brand did identify at its Cambodian supplier that severance payment was not done in line with the local law, which the brand followed up. In its COVID-19 questionnaire to suppliers, the brand asked whether factories had taken specific OHS measures, which was supported by photographic evidence. The brand did not yet check whether workers were included in negotiating and taking specific measures to handle the COVID-19 pandemic.

Other:

Thanks to its risk assessment, Hakro is well aware of risks in the countries it is sourcing from, such as excessive overtime and freedom of association. The member actively checks and responds to these issues in its iMPACT-programme, although complicated issues such as monitoring and supporting a functioning social dialogue and the identification and prevention of gender-based violence are not yet fully incorporated in its programme.

**Recommendation:** Fair Wear recommends Hakro to ensure capacity building to prevent and remediate GBV-issues at its Bangladeshi supplier and to ensure the brand and factory have mechanisms in place to identify and remediate GBV. Furthermore, Fair Wear recommends Hakro to create more awareness among its suppliers on the employment of Syrian refugees, for example through the WEP-basic training. We also recommend Hakro to actively engage with suppliers to identify and monitor worker involvement in handling the COVID-19 pandemic. Lastly, we encourage Hakro to further develop its iMPACT-programme to enable it to identify and respond to more complex issues, such as GBV.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

**Comment:** Hakro actively collaborates with OLYMP in its IMPACT-programme but does not have shared production locations with them. At one supplier, a Fair Wear member has placed production, but it is an insignificant amount. Therefore, this indicator is rated n/a.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	No production in low-risk countries	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	N/A	2	0

**Comment:** Hakro does not source from countries that are considered low-risk.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

**Comment:** With a monitoring percentage of 73%, Hakro has made good efforts in monitoring its supply chain in its first year of membership. However, this percentage is not yet sufficient to assess it against this bonus indicator.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

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

## Monitoring and Remediation

**Possible Points: 19**

**Earned Points: 13**

### 3. Complaints Handling

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** Hakro has two dedicated CSR staff members who follow up on worker complaints. The CEO is also involved in following up with any complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

**Comment:** In 2021, Hakro engaged with all suppliers to inform them about the Fair Wear Code of Labour Practices and the grievance mechanism. The brand asked suppliers to post the Worker Information Sheet. Through its IMPACT-programme the brand checked whether the WIS was posted and found that in several cases the sheet was not posted or was not posted correctly. The member then engaged with the factories to ensure that the sheet was posted and asked for photographic evidence. In Turkey, local Hakro staff also checked whether the sheet was posted.

However, at the factories where an audit through the IMPACT programme did not take place, the brand did not always ask for proof (e.g. photographic evidence) of the sheets being posted in a place that is safe and easily accessible to workers.

**Requirement:** Hakro must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories, in a location that is accessible to all workers. Hakro should check by means of a visit whether the Worker Information Sheet is posted in the factories.

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

**Recommendation:** It is suggested to ask production locations to submit a photo of the posted Worker Information Sheet and to ask staff visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

## Complaints Handling

**Possible Points: 3**

**Earned Points: -1**

## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** The CSR staff of Hakro did an extensive introduction of sustainability and Fair Wear to all their colleagues. Through twelve in-house supply chain workshops, people were informed of Fair Wear membership. Furthermore, staff is informed through updates in newsletters and an in-house FAQ.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** CSR staff of Hakro regularly engage with staff that is in regular contact with suppliers, such as the CEO and the purchasing department. They are informed of Fair Wear requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

**Comment:** Hakro makes use of three intermediaries. These intermediaries were on-boarded about Fair Wear membership and its requirements. They are also involved in CAP follow up and the remediation process.

**Recommendation:** Hakro could consider making more active use of its intermediaries in the monitoring and verification of issues that are remediated, such as through documents checking and on-site verification.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

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

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

## Training and Capacity Building

**Possible Points: 5**

**Earned Points: 5**

## 5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

**Comment:** Hakro works with eleven suppliers and has a subcontracting policy in place which excludes subcontracting. The brand checked and ensured that all production processes can take place in the factory. Hakro makes use of its own audit programme to check this.

Furthermore, the member provides long lead times and discusses production planning with its suppliers, which lowers the risk of subcontracting. At its Turkish suppliers, local staff are on-site. The brand checks the quality of the products to check whether there are no quality differences which could indicate a risk of subcontracting.

Hakro places a significant part of its production at one of its Lao suppliers, while placing a small portion of its production at the other Lao supplier and three Chinese suppliers. The latter are owned by its Cambodian supplier. The brand only discusses lead times and production planning with the intermediary. The intermediary does inform Hakro of the supplier it will use, but these suppliers have not yet been audited by Hakro and checked for subcontracting.

**Recommendation:** Fair Wear recommends Hakro to further discuss and check the risk of subcontracting at its Chinese and Lao suppliers, for example by identifying other factories that are owned by its Cambodian supplier and by planning an audit.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** The CEO, CSR and purchasing department actively share information about working conditions at suppliers. Audits are also accessible to these staff members. However, during the COVID pandemic, the CEO and the suppliers regularly engaged in an informal manner, limiting the brand's ability to document issues and integrate follow up in its systems. Furthermore, the comprehensive risk assessment is mainly accessible to CSR staff and not actively used by other staff.

**Recommendation:** Fair Wear recommends Hakro to further integrate human rights due diligence into its management systems, ensuring the active documentation and sharing of risks, issues and follow up.

---

## Information Management

**Possible Points: 7**

**Earned Points: 7**

---



## 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Hakro communicates about Fair Wear Foundation on its website and social media. Through its newsletters, the brand also informed its retailers about Fair Wear membership which responded very positively to this step. The member makes use of the Fair Wear communication toolkit and adheres to the communication guidelines.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

**Comment:** In its social report, Hakro provides a comprehensive account of the issues it is facing in its supply chain at particular (anonymized) suppliers. The brand is engaging with its suppliers to obtain their consent to disclose the production locations. None of its suppliers has provided this consent yet. As this is its first year of membership, the member has not yet published a Brand Performance Check report.

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

**Comment:** Hakro submitted its social report to Fair Wear and published it on its website.

## Transparency

**Possible Points: 6**

**Earned Points: 5**

## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The CEO and the management team are highly involved in the integration of Fair Wear membership in its company. They have regular meetings with CSR staff in which they discuss progress. They evaluate overall progress and Fair Wear membership before writing its annual work plan. Hakro plans to further evaluate membership after its first performance check.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

**Comment:** There were no previous requirements as this was Hakro's first check.

---

## Evaluation

**Possible Points: 2**

**Earned Points: 2**

---

## Recommendations to Fair Wear

- Hakro recommends Fair Wear to ensure that first-year members have and maintain overview of the requirements and deadlines that need to be met, for example through an overview or checklist.
- Hakro recommends Fair Wear to improve the accessibility of the Member Hub.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	25	52
Monitoring and Remediation	13	19
Complaints Handling	-1	3
Training and Capacity Building	5	5
Information Management	7	7
Transparency	5	6
Evaluation	2	2
Totals:	56	94

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

60

### Performance Benchmarking Category

Good

## Brand Performance Check details

Date of Brand Performance Check:

04-04-2022

Conducted by:

Wilco van Bokhorst

Interviews with:

Carmen Kroll - Managing Director

Thomas Müller, Managing Director

Danny Jüngling, Commissarial Head of Purchasing, Marketing and Communication

Heike Schmidt, Head of Team Procurement

Nicole Trumpp, Head of Finance & Success

Jochen Schmidt, Head of Sustainability

Anna Rüchardt, Project Manager Sustainability