



Brand Performance Check

s.Oliver Bernd Freier 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 www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 146

Possible score: 208

Benchmarking Score: 70

Performance Benchmarking Category: Leader



Foundational
system's criteria

100%



Sourcing strategy

71%



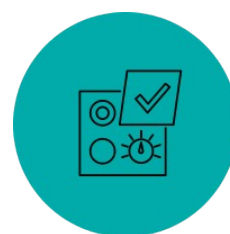
Identifying
continuous human
rights risks

80%



Responsible
purchasing
practices

62%



Quality and
coherence of
prevention and
remediation system

73%



Improvement and
prevention

67%



Communication,
transparency and
evaluation

73%

Summary:

The s.Oliver Group has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 70, the member is placed in Leader category.

The s.Oliver Group's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients.

The s.Oliver Group conducts risk scoping and includes all risk factors. The brand assesses risks on a 'category' level, for example 'child and forced labour' or 'discrimination', and includes descriptions of the specific risks per category per country in its Qualitative Data on Countries document. The brand does not assess risks related to living wages as it states that living wages are not yet paid throughout its supply chain and thus chooses to focus on risks related to legal wage requirements such as not paying legal minimum wages or not paying overtime premiums, allowances, bonuses or social security benefits as legally required. In its Qualitative Data on Countries, the brand does sometimes include information on living wages, but not for all countries. Input from workers, suppliers and stakeholders is included in the risk scoping by incorporating information from relevant NGO, governmental or university reports, from discussions with local partners such as the RMG Sustainability Council (RSC) and from the brand's risk assessment analysis which incorporates worker and management interviews.

The s.Oliver Group has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. Next to audit reports and supplier self assessments on risks, the member also includes information from complaints and training reports in its factory risk assessments. Additionally, the brand conducts regular monitoring visits at its factories in countries where it has a local presence, namely Bangladesh, Indonesia, China and Türkiye. Next to its systematic approach, the brand ensures it uses tools that include input from workers and suppliers, and other stakeholders. These tools are its own audits, which include worker interviews and management interviews. However, the s.Oliver Group does not often use third-party monitoring tools that include input from external stakeholders. The brand has identified the right monitoring frequency per outcome of the risk scoping. However, the monitoring tools employed by the brand do not always cover the eight Code of Labour Practices. For example, its own audit methodology focuses on legal wage requirements and does not look at living wages. Similar to its risk scoping framework, the brand does not assess living wage risks in its factory risk assessments, instead only looking at legal wage non-compliances.

During 2023, the s.Oliver Group focused on Freedom of Association and gender, raising awareness about these topics and strengthening internal social dialogue mechanisms at its suppliers through training. The member implemented eight Violence and Harassment Prevention Programme modules at eight suppliers in Bangladesh, Indonesia and India, three Communication Programmes at three suppliers in Viet Nam and Indonesia and three Factory Dialogue Modules at three suppliers in Türkiye. The brand also started researching the possibility to start a Living Wage pilot at one of its Asian suppliers, for which it started analysing the costs of financing wage increases at this supplier and is conducting a worker survey to set a living wage benchmark.

Fair Wear encourages the s.Oliver Group to continue its work on the Living Wage pilot. Fair Wear advises the brand to further improve its risk assessments and factory action plans by adding more preventive and mitigative actions and to ensure more factories have an action plan that matches their risk profile.

The s.Oliver Group sources from 46 production locations in Bangladesh with a production volume of 27% 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 some new indicators, which may result in a lower score for member brands. Because of this transition, Fair Wear temporarily lowered the scoring threshold.

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 s.Oliver Bernd Freier GmbH & Co. KG

Member company information

Member since: 1 Apr 2022

Product types: Garments, clothing, fashion apparel, Bags, Accessories, Outdoorwear and Footwear

Percentage of turnover of external brands resold 0%

Member of other MSI's/Organisations Partnership for Sustainable Textiles, BCI (Better Cotton Initiative), International Accord - Bangladesh, International Accord - Pakistan and Textile Exchange

Number of complaints received last financial year 16

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
China	86	34.18%
Bangladesh	46	26.69%
Indonesia	9	9.38%
Türkiye	33	8.94%
India	30	4.49%
Bulgaria	6	3.79%

Pakistan	3	2.65%
Viet Nam	7	2.6%
Ukraine	3	1.62%
Poland	11	1.52%
Cambodia	5	1.16%
North Macedonia	2	0.88%
Armenia	2	0.58%
Lithuania	2	0.51%
Portugal	6	0.43%
Sri Lanka	1	0.31%
Romania	1	0.11%
Tunisia	1	0.05%
Germany	1	0.05%
Italy	2	0.02%
Belarus	1	0.01%

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

Comment: The s.Oliver Group has a Human Rights Due Diligence (HRDD) policy, but some elements such as how HRDD is included into decision-making at an organisational level need improvement.

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.: Yes

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

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

Comment: The s.Oliver Group discloses 81% 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: The s.Oliver Group discloses 81% 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: 64

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	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: The s.Oliver Group does not have a formal sourcing strategy written down. However, the s.Oliver Group does have a sourcing strategy addressing influencing labour conditions which is known throughout the company. The s.Oliver Group has a sourcing strategy addressing influencing labour conditions which is operationalised through its Vendor Dashboard. This Dashboard is connected to different IT systems and brings together various data and Key Performance Indicators (KPIs) to keep track of supplier performances and the supply chain. Through it, order volumes and leverage at each supplier can be assessed. The KPIs (also for sustainability) are openly communicated and discussed with suppliers in different formats (for example in vendor "townhall meetings"), with the target to increase influence at well performing, strategic suppliers and consolidate the supply chain wherever else it is necessary

The member had 258 active suppliers in 21 sourcing countries in 2023. 65% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 32% of the production volume comes from suppliers where s.Oliver Group buys less than 2% of its total FOB. This is an improvement compared to the previous year.

The s.Oliver Group's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients.

Recommendation: Fair Wear recommends the member to formalise its sourcing strategy by having it in writing and to include a preference for countries where freedom of association is possible. Fair Wear recommends the s.Oliver Group to further consolidate its supplier base where possible and increase leverage at main production locations to effectively request improvements in working conditions. It is advised to describe the consolidation process in the sourcing strategy, agreed upon with top management and sourcing staff.

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: The s.Oliver Group has a sourcing strategy that focuses on maintaining long-term relationships. This has been formalised in the brand's Responsible Purchasing Practices Policy which is shared with all suppliers. 69% of the member's total FOB volume comes from suppliers with whom s.Oliver Group has a business relationship for at least five years. The member has ongoing contracts with its suppliers with a three month notice period and discusses the potential order level the supplier can expect annually. The brand sometimes places one-off orders, in which case the supplier is informed of this prior to the start of the business.

Recommendation: Fair Wear recommends the s.Oliver Group to commit to long-term contracts with a longer notice period, in line with the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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: The s.Oliver Group conducts risk scoping and includes all risk factors. The brand assesses risks on a 'category' level, for example 'child and forced labour' or 'discrimination', and includes descriptions of the specific risks per category per country in its Qualitative Data on Countries. The brand does not assess risks related to living wages as it states that living wages are not yet paid throughout its supply chain and thus chooses to focus on risks related to legal wage requirements such as not paying legal minimum wages or not paying overtime premiums, allowances, bonuses or social security benefits as legally required. In its Qualitative Data on Countries, the brand does sometimes include information on living wages, but not for all countries.

The member assesses country risks in two-fold: Country Gross risks, based on desktop research, and Country Net Risks, based on its own factory risk assessment analysis which looks mostly at the s.Oliver Group's own audit reports and some external audit reports. In its Country Gross Risk scoping, the member has not assessed the impact and prevalence of all risk categories for all countries. In its Country Net Risk scoping, the member has not assessed the impact and prevalence of all risks correctly. The s.Oliver Group assessed the impact and prevalence of risks related to legal wage requirements and legally binding employment relationships low in, for example, Tunisia, while several sources indicate otherwise.

The s.Oliver Group's main sourcing country is China, where it sources from 86 production locations with a production volume of 34% of its total FOB. The main risks the brand has identified in China are discrimination, freedom of association, and the payment of legal wage requirements. The brand sources from 46 production locations in Bangladesh with a production volume of 27% of its total FOB. The member company has signed the International Accord.

The member particularly looks at wage discrimination, sexual harassment and gender-based violence. Input from workers, suppliers and stakeholders is included in the risk scoping by incorporating information from relevant NGO, governmental or university reports, from discussions with local partners such as the RMG Sustainability Council (RSC) and from the brand's risk assessment analysis which incorporates worker and management interviews.

The brand has included its cooperation with licensees as a business model risk and is aware that this may increase its exposure to integrity risks.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding sourcing and increasing or decreasing order volumes at suppliers.

To date, the s.Oliver Groups' sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union or bargain collectively.

Recommendation: Fair Wear recommends the s.Oliver Group to include all labour standards, including living wages, explicitly and individually in its risk scoping. Fair Wear recommends the s.Oliver Group to reconsider the impact and prevalence of the risks in its risk scoping. Moreover, Fair Wear strongly recommends the member to privilege countries where workers can freely form or join a trade union and bargain collectively and make this explicit in its sourcing strategy.

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 s.Oliver Group to inform new suppliers about its HRDD policy and Fair Wear membership by sending the Fair Wear questionnaire, the Worker Information Sheet and the Production and Licence Agreement which includes the Sustainability Fact Sheet and the Code of Conduct which links to policies on risks. The s.Oliver Group added 22 factories in the last financial year and relies upon its digital systems to keep track of the process being followed for each and every one of them. Additionally, the brand started a joint dialogue with suppliers about human rights and how the supplier and the s.Oliver Group can cooperate on this topic through its online 'Townhall' meetings where it discusses sustainability topics with all its suppliers.

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.	Advanced	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.	6	6	0

Comment: The s.Oliver Group assesses risks for new production countries during its risk scoping process based on desktop research. Based on the risk level (minor, moderate, significant, serious), the s.Oliver Group collects human rights information of potential new suppliers. For new suppliers with a minor risk level, the brand collects a self-assessment and, if present, existing audit reports. For new suppliers with a moderate risk level the brand additionally conducts its own sustainability assessment. For new suppliers with a significant risk level, the brand always conducts its own sustainability assessment and for new suppliers with a serious risk assessment the brand checks whether there are unresolved complaints as well. The brand only onboards suppliers that score well enough in the assessments. The s.Oliver Group's own audit methodology includes worker interviews and management interviews and as such the brands also collect information from workers and stakeholders to inform the sourcing decision.

The member company onboarded a supplier in Bangladesh and checked the remediation status on the website of the RMG Sustainability Council (RSC) before placing the first purchasing order.

The member does not yet collect human rights information for suppliers of licensees or of partners in design collaborations. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union or bargain collectively.

The s.Oliver Group followed this process for the suppliers added in the last previous year.

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.	Basic	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.	2	6	0

Comment: The s.Oliver Group has added 22 new suppliers in 2023. The s.Oliver Group shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The s.Oliver Group has not yet organised onboarding sessions for all of its new suppliers to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue, but addresses these topics during its own audits where they check whether the Fair Wear Worker Information Sheet is posted and whether workers are aware of the available grievance mechanisms and social dialogue mechanisms.

Recommendation: The s.Oliver Group is recommended to organise onboarding sessions specifically focusing on the CoLP and the grievance mechanism within the first year of doing business.

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.	Basic	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.	2	6	0

Comment: The s.Oliver Group has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. The brand assesses human rights risks in its production locations in 'minor risk' countries by collecting external audit reports and supplier self assessments on risks. For factories in countries the s.Oliver Group deems 'moderate risk' or 'high risk', it conducts its own audits annually in addition to collecting supplier self assessments on risks. For factories that are performing well, it conducts its own audit every second year. For factories in 'extreme risk' countries such as Bangladesh, the s.Oliver Group collects additional NGO reports such as the the RSC assessments. Moreover, the brand has started to conduct Fair Wear factory onsite assessments at higher risk factories. Next to audit reports and supplier self assessments on risks, the member also includes information from complaints and training reports in its factory risk assessments. Additionally, the brand conducts regular monitoring visits at its factories in countries where it has a local presence, namely Bangladesh, Indonesia, China and Türkiye.

Next to its systematic approach, the brand ensures it uses tools that include input from workers and suppliers, and other stakeholders. These tools are it's own audits, which include worker interviews and management interviews. However, the s.Oliver Group does not often use third-party monitoring tools that include input from external stakeholders.

The brand has identified the right monitoring frequency per outcome of the risk scoping. However, the monitoring tools employed by the brand do not always cover the eight Code of Labour Practices. For example, its own audit methodology focuses on legal wage requirements and does not look at living wages. Similar to its risk scoping framework, the brand does not assess living wage risks in its factory risk assessments, instead only looking at legal wage non-compliances.

The s.Oliver Group has an appropriate system to identify risks at Bangladeshi suppliers and has access to assessments of RSC. The member is an active member of the International Accord and is actively involved in discussions with the RSC about risks in Bangladesh and risks in its supplier locations. Moreover, the s.Oliver Group uses the information from the RSC assessment reports in its factory risk assessments.

Although there is not a discrepancy between the outcomes of the s.Oliver Group's monitoring tools, there is a discrepancy between the brand's risk assessment process and the common risks identified in external sources, such as Fair Wear country studies. For instance, while risks related to Freedom of Association are common in China and Viet Nam, the s.Oliver Group's tools to assess risks do not identify non-compliance on this issue for most Chinese and Vietnamese factories. The member has not adapted its risk assessment process to ensure thorough identification of potential non-compliances on this labour standard.

Recommendation: Fair Wear strongly recommends that the s.Oliver Group diversifies its monitoring tools and further investigates when it does not identify risks that are common in the production country. Moreover, the s.Oliver Group should include all relevant human rights risks in its risk assessment process.

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).	Advanced	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.	6	6	0

Comment: The s.Oliver Group has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are 'Freedom of Association restricted by law', 'factories keeping workers on short-term contracts to discourage their participation in union activities', and 'harassment or intimidation of union representatives'.

The s.Oliver Group uses this information to understand what the risks at its suppliers are and inform itself how to engage with its suppliers on this topic. The brand does not yet assess this information on supplier level.

The s.Oliver Group can demonstrate advanced knowledge and understanding of FoA in all countries where it sources. The member has supplier-level monitoring in place through its own audits to assess and understand the risk at suppliers. The s.Oliver Group also tracks which suppliers have trade unions and CBAs in place.

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 s.Oliver Group has included gender in its human rights risk identification. The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified sexual harassment, gender based violence, harassment of female worker representatives and unsafe working conditions for pregnant or menstruating workers as important risks prevalent in Bangladesh.

Additionally, the s.Oliver Group actively collects gender data for most of its factories. Data that it collects are the percentage of male/female workers in management positions, the percentage of male/female workers in worker representative roles and the percentage of male/female workers in overtime findings. This information is collected through its own audits.

The member has yet to analyse the collected gender-disaggregated data at the factory and country levels. The member has not yet analysed into how its business practices affect gender at its suppliers.

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: The s.Oliver Group has a strong and systematic evaluation system for assessing suppliers' human rights performance. The brand continuously assesses its suppliers on eight sustainability KPIs from which five are social sustainability indicators (transparency, score own audit, remediation score, social practice score and due diligence score). The brand systematically integrates the outcome of this evaluation into its purchasing decisions. The sustainability KPIs make up 25% of the overall supplier score, and the supplier scores are used in decision-making regarding increasing or decreasing production at a supplier. The brand does not yet consider the human rights performance of suppliers of its licensees in its purchasing practices. The s.Oliver Group shares and discusses the outcome of the evaluation with its suppliers.

Recommendation: The s.Oliver Group 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: The s.Oliver Group uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations or subcontractors in the database. Additionally, the member actively prevents unauthorised subcontracting by visiting suppliers during production and conducting capacity checks, sharing its policy on unauthorised subcontracting with suppliers prior to starting production and by mapping its supply chain in the traceability platform Retraced.

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: The s.Oliver Group 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 it has not come across homeworkers in its monitoring efforts (audits and monitoring visits). Next to that, it shared its policy on homeworkers with its suppliers which outlines that suppliers can use homeworkers if they meet heightened information requirements and no suppliers have requested to use homeworkers.

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: The s.Oliver Group uses contracts with its suppliers. The member has agreements in the form of Production & License (P&L) Agreements that stipulate terms of payment, delivery, liability, penalties and termination.

The P&L Agreement is indefinite and may be terminated by both parties with a notice period of three months. Moreover, both parties may terminate the contract with immediate effect 'for good cause'. Payments are done upon receipt of the invoice or receipt of the order. In practice, payment terms are up to 60 days upon the goods being loaded on the vessel, but this is not reflected in the P&L Agreement. The P&L Agreement contains general provisions on delivery and payment terms, but specific delivery deadlines or information on pricing is in the Sales Contract. The brand does not yet ringfence labour costs.

In the case of delays or quality issues, the member works with a sanctions catalogue which is shared with the supplier as an annex to the P&L Agreement. According to the sanctions catalogue, in case of late deliveries or damages the supplier needs to pay without proof of fault. In practice the brand checks proof of fault before implementing penalties, but this is not reflected in the sanctions catalogue.

Although the P&L Agreement includes the Code of Labour Practices in the annexed Sustainability Fact Sheet, the P&L Agreement itself does not support the implementation of human rights due diligence. An unequal burden is placed upon suppliers by holding them responsible for compliance with all social requirements. The P&L Agreement does not include information on (financial responsibility for) shared responsibilities of CoLP implementation, nor on fair payment terms. Moreover, proof of fault for penalties is not yet embedded in the P&L Agreement.

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

Recommendation: Fair Wear strongly recommends that the s.Oliver Group remove penalties for late delivery from its contracts, or at least ensure there is 'proof of fault by the supplier' embedded in the contracts. The s.Oliver Group 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.	Advanced	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.	6	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. Next to that, sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies. Examples of these KPIs are 'disclosure of suppliers until Tier 3' and 'remediation of 80% of all factory findings'.

Recommendation: The s.Oliver Group could further adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Basic	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.	2	6	0

Comment: The s.Oliver Group works with forecasting and yearly discusses with the suppliers what capacity they have and what their annual business expectations are. Twice a year, an order plan per month for the next six months is shared with the suppliers. The brand's lead time is 120 days. If the suppliers are not sure if they can manage it, the member discusses in detail with them what the needed capacity is so they can jointly find solutions, such as onboarding a subcontractor if agreed by the brand. This is done also for other operations, to ensure capacity is also available at the supporting processes, such as washing or for example sequin production. The member is aware that such critical processes also affect production and that this can create pressure on the factory. When the factory is not able to meet the demand, the s.Oliver Group expects factories to inform them so the brand can shift production to another supplier. In the countries where the s.Oliver Group has local staff or works with an agency, there is more insight into the actual production capacity of the manufacturers than in the other countries.

The s.Oliver Group has an overview of its orders and local agencies have insight into the capacity of the suppliers. Together with the sourcing teams at the agencies, capacity planning is done at vendor (supplier) level. The member does not have detailed insight into the manufacturers capacities, but does track factories' high season and low season (low versus high production months). The s.Oliver Group knows how many manufacturers the vendors (suppliers) work with and what the approximate capacity of those factories is. The member uses this to estimate the capacity of the supplier.

The s.Oliver Group works with forecasts based on the previous year. The forecasts sometimes are not correct, which is why the update of the order plan is shared with the suppliers every six months.

The member does not do late changes to design, because after the salesman samples have been approved the design cannot be changed anymore. Furthermore, to avoid putting pressure on the factories, the member gives the suppliers some buffer time built into the delivery date.

Due to the issues in the transport sector, the member mostly experiences delays in transport which are unrelated to the supplier. The member tries to solve this by requesting suppliers for more capacity or shorter lead times if possible and if necessary.

Some delays are accepted, but beyond that, factories receive a penalty. The brand does assess who's at fault when applying penalties. If the order is delayed because fabric delivery was late, the brand is responsible for the delay and then the factory is not liable. In some cases, the brand accepts to split the costs for shipment.

Recommendation: Fair Wear strongly recommends the s.Oliver Group to collect more information about the production planning and possible delays not only on vendor level, but to extend this to the production sites as well. This will allow the s.Oliver Group to better understand the impact of its orders on factories' capacity. The s.Oliver Group is strongly recommended to actively involve its suppliers in the forecasting and planning process. The member is encouraged to evaluate with the supplier the production process after each season and, where needed, adapt its future planning.

Fair Wear recommends the member to explore planning production in minutes instead of pieces to assess better its suppliers' production capacity. Furthermore, at suppliers where the s.Oliver Group is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season.

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.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	4	6	0

Comment: The s.Oliver Group has a good understanding of the wage levels at its suppliers through audits and a basic understanding of how the wages connect to its own buying prices. The member has insight into the labour component of its prices, as it works with open costing on material and operational costs. The costing breakdown separates Contribution Margin (CM) costs and overhead costs. CM costs are based on standard allowed minutes (SAM) from GSD software, which often vary a lot from the actual production time. The member does not have insight into the actual factory minute value. The member has a rough understanding of the labour cost component of the price based on the cost per line, the output and the total CM cost. The member does a plausibility check of its prices this way. Moreover, the member enrolled one of its suppliers in a Fair Price training. The s.Oliver Group takes into account increasing costs such as wages and inflation before every order, where possible letting the factory absorb the cost.

Recommendation: Fair Wear strongly recommends the s.Oliver Group to structurally and actively incorporate wages and inflation into its prices. The s.Oliver Group could provide suppliers who do not work with fact-based costing, training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

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: The s.Oliver Group has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The brand requires all intermediaries to read and sign s.Oliver Group's Production and Licence Agreement, which includes its Code of Conduct and Sustainability Fact Sheet and offers training on its HRDD practices to all intermediaries. Next to that, the intermediaries actively support HRDD and the implementation of the CoLP by informing suppliers about the necessary requirements and by supporting in Corrective Action Plan (CAP) follow-up. The member requires its intermediaries uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP), but the brand does not yet verify this.

Layer 3 Prevention, mitigation and remediation

Possible Points: 96

Earned Points: 66

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.	Intermediate	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.	4	6	0

Comment: The s.Oliver Group has prioritised risks and created action plans per supplier, counting for 71% of its active suppliers. The s.Oliver Group bases most of its action plans on CAPs from its own audits. The brand does not yet have action plans going beyond CAPs for all its factories, nor do all action plans match the factory's risk profile.

The member followed up on audits and created additional follow-up actions for some of its suppliers, planning training modules for its factories where it identified the highest need for training. Information from audits and training feeds back into the risk profiles. As the member's own audits do not always identify findings which have a high risk of occurring in the country and as its own audit methodology does not cover all eight labour standards, the factory action plans do not always match the risk profile of the factory. For example, at one of its suppliers in Türkiye, the brand identified discrimination, excessive overtime and health and safety as risks. However, the next audit only revealed findings related to health and safety. Non-compliance issues related to discrimination and overtime were not reported. Despite the assessed risks, the s.Oliver Group did not undertake additional (monitoring) actions to assess whether these risks are valid.

As a member of the International Accord, the member company could show it integrated the Accord Bangladesh Safety Program into action plans for its suppliers in Bangladesh and works on joint prevention, mitigation and remediation with the RSC and signatories of the International Accord. The member also signed the Pakistan Accord.

The member's action plans detail the different approaches to remediate harms, but do not yet include details on preventing and mitigating the prioritised risks for all factories. The action plans do include a budget and timeline.

Recommendation: Fair Wear recommends the member to further complete its action plans by adding more preventive and mitigative actions and to ensure more factories have an action plan that matches their risk profile.

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

Comment: The s.Oliver Group has started to include a gender lens in its improvement and prevention steps. It has added a gender lens to its audit methodology, monitoring and following up on the existence and effectiveness of anti-harassment policies and committees. Based on the gender-disaggregated data it collects at the factory it engages in dialogue with its suppliers on increasing the percentage of women workers in higher positions or leadership roles in trade unions or participation committees, the percentage of female workers coming back after maternity leave or offering secure transportation of workers in case of overtime.

For prevention, the member focuses on training and awareness raising. The brand has implemented eight training modules on gender or Violence and Harassment Prevention at eight suppliers in Bangladesh, Indonesia and India. The brand has selected these suppliers based on the factory risk assessment, where discrimination was assessed with the highest risk.

Recommendation: Fair Wear recommends the s.Oliver Group to make the gender lens in its action plans more comprehensive and apply it to all its factory action plans.

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.	Intermediate	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.	4	6	0

Comment: The s.Oliver Group included some steps to encourage freedom of association (FoA) and effective social dialogue in its action plans. As part of its factory action plans, the member has integrated FoA into its audit procedures adding questions on, for example, workers' access to FoA and non-retaliation mechanisms for workers that want to form or join a trade unions. Moreover, the brand provided training on the topic to its own employees via online training resources. The brand has also added KPIs specifically related to FoA and social dialogue (SD) to its supplier score methodology, ensuring the topic is regularly discussed and promoted with all suppliers.

Moreover, for some of its action plans, the s.Oliver Group included comprehensive steps to encourage FoA and effective social dialogue. These steps are implementing training to raise awareness about SD and FoA and training to strengthen internal social dialogue mechanisms such as worker committees. The member selected suppliers to receive such training based on its risks scoping and factory risk assessment, as well as on the potential for action and its leverage. The brand implemented the following training modules, which are aimed at creating or strengthening internal social dialogue mechanisms in the factory:

Eight Violence and Harassment Prevention Programme modules at eight suppliers in Bangladesh, Indonesia and India.

Three Communication Programmes at three suppliers in Viet Nam and Indonesia.

Three Factory Dialogue Modules at three suppliers in Türkiye.

The member has implemented these steps. The s.Oliver Group has started to apply a gender lens to its comprehensive steps, ensuring women workers are always included in training and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: Fair Wear recommends the s.Oliver Group to include comprehensive steps to encourage FoA and effective social dialogue in all its action plans, especially for factories where this is a higher risk.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Advanced	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.	6	6	0

Comment: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and are monitored systematically every year through the brand's own audits. These audits include worker interviews. The s.Oliver Group's own audit methodology includes questions on the existence and functioning of internal grievance mechanisms and the brand follows up on issues related to factory-level grievance mechanisms when they come up in CAPs. Based on the finding, the brand tries to understand the root causes and discusses remediation steps with its supplier. Usually, remediation steps are either ensuring the grievance mechanism is captured in a written process or ensuring workers are trained on the related processes. The brand follows up on the remediation during its next visit. Moreover, the existence and functioning of a factory's grievance mechanism is systematically assessed in the supplier's KPI rating, which influences the member's 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: The s.Oliver Group cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. The member company can demonstrate it works on joint prevention, mitigation and remediation with the RSC and signatories of the International Accord. At suppliers that are not shared with other members, the s.Oliver Group works together with other customers, responding to complaints and sharing information. Next to that, the member also cooperates in taking more preventive measures, such as organising training.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	67%	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: During the performance check, the member could demonstrate with a sample that more than two third of the CAP issues requiring improvement actions have been followed up.

Examples of improvement actions that were taken include addressing disciplinary procedures and training supervisors on this, ensuring the Worker Information Sheet with Fair Wear's complaints information was visible in its factories, ensuring medical check-ups were conducted and ensuring a factory's performance appraisal process was formalised in a written procedure.

The CAP issues that require improvement actions and are still open are issues that are more complex or structural, and therefore need more time to be remediated, such as training related to a factory's grievance mechanism on discrimination and harassment which has been planned for 2025.

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: The s.Oliver Group 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. Examples of the discussed root causes are 'lack of OHS monitoring', 'lack of production planning from factory' and 'lack of finance and HR management systems'. The member developed and implemented some preventive steps like implementing awareness training of health and safety standards and implementing violence and harassment training modules at some of its suppliers. The member also started looking at its own purchasing practices to identify root causes, but so far have not identified any. The member has yet to do this for all code of labour practices, such as living wages.

Recommendation: Fair Wear recommends s.Oliver Group 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: The s.Oliver Group has some suppliers where action plans are not needed. These suppliers, located in Germany, Portugal and Italy, cover less than 1% of the member's total FOB. The member has a system to ensure possible human rights risks are regularly discussed with these suppliers as they regularly discuss the suppliers' KPI performance with them, which includes KPIs on social sustainability. Moreover, the s.Oliver Group regularly reviews changes to the risk situation by auditing these factories every two years. The member has yet to include worker representatives or local unions in discussions with factory management on possible human rights risks.

Recommendation: The s.Oliver Group is recommended to ensure worker representation or 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.	Basic	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.	2	6	0

Comment: In the previous year, two complaints and three out of three Fair Wear onsite assessment reports examined mention excessive overtime.

The s.Oliver Group analysed the root causes of these findings. According to the member, lack of planning and lack of monitoring overtime by factory management or not having enough workers employees are significant causes for excessive overtime. The member also examined its own purchasing practices to identify possible root causes for excessive overtime but has not yet found any. The member has not addressed this sufficiently yet.

The member has taken action to address the root causes, by discussing the findings with its factories and urging them to update their planning systems, if needed with support from the s/Oliver Group's team. With another factory, the brand agreed that the factory would hire more workers to remediate the excessive overtime issues. The s.Oliver Group monitored working hours closely for this factory to verify this. The s.Oliver Group could not yet show that its efforts resulted in reduced excessive overtime at all its factories with overtime findings.

Recommendation: With its suppliers where excessive overtime occurs, Fair Wear recommends the s.Oliver Group to verify whether production is planned with overtime. If production is planned with overtime, the brand should ensure that its products can be produced during regular working hours.

The s.Oliver Group could use the outcomes of the root cause analysis to identify strategies that minimise the impact of its sourcing practices on working hours. The member could develop processes to deal with possible delays to avoid excessive overtime. Those processes include being flexible with delivery dates, prioritising orders, offering support/flexibility for material delivery, ordering in low season, keeping stock etc.

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 the previous year, ten complaints and three out of three Fair Wear onsite assessment reports examined included findings regarding non-payment of legally required wage elements. Examples of the findings are 'overtime premium is not paid as legally required', 'statutory leaves are not paid as legally required' and 'maternity benefits are not paid as legally required'. The s.Oliver Group responded immediately to these findings by discussing the finding with factory management and highlighting the urgency of the finding by pointing out how the finding is related to legislation. Together with the factory management, the brand discusses a plan for remediation and monitors this through its own audits or Fair Wear's local teams. The s.Oliver Group responded to these findings in a timely manner. The s.Oliver Group could show that all due wages were compensated. The s.Oliver Group has included workers' representation in verifying the findings as worker interviews are part of its audit methodology, but has yet to include workers' representation in finding a solution to these findings.

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

Comment: The s.Oliver Group has a basic overview of the wage levels at its suppliers. The brand discusses the topic of wages with one of its suppliers where it is examining the possibility to conduct a living wage pilot. The s.Oliver Group understands which suppliers pay wages below living wage estimates as a consequence of the member's policies and actions. The brand identified competitive pricing strategies in the garment industry as a root cause. The s.Oliver Group followed up on this and reviewed internally how the member's pricing practices could be altered and is working on a plan to alter this. The brand is examining if and how it can set up a living wage pilot at one of its suppliers in Indonesia and is currently conducting a worker survey on living wage estimates. The member has yet to develop a systemic and time-bound approach to get wages increased towards a living wage.

Recommendation: Fair Wear encourages the s.Oliver Group 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: The s.Oliver Group has started to address the topic of living wage internally, by setting up a living wage strategy agreed upon by relevant management staff, including the CFO. The living wage strategy has the objective of having a fair wage system by 2030. The brand has started examining the option to start a living wage pilot project at one of its Asian suppliers to learn more about the topic and to be able to create a practical, long-term strategy for its entire supply chain. The brand consulted with Fair Wear and other member brands to get started with the living wage pilot. It collected an overview of wages paid at the Asian supplier. The s.Oliver Group has started analysing the costs of financing wage increases at this supplier and is conducting a worker survey to set a living wage benchmark. The member has not yet discussed wage increases with its factories. The s.Oliver Group also does not yet have a strategy on how to finance wage increases at its suppliers.

Recommendation: The s.Oliver Group should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

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.	0.16%	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.	0	6	0

Comment: Audits show a living wage estimate is paid at two suppliers in Germany and Romania responsible for less than 1% of the s.Oliver Group's FOB.

Requirement: The s.Oliver Group is expected to begin setting a target wage for its production locations.

Recommendation: We encourage the s.Oliver Group 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: The s.Oliver Group received fifteen complaints in the past financial year about the labour standards 'employment is freely chosen', 'living wage', 'safe & healthy working conditions', 'legally binding employment relationships', 'no discrimination' and 'reasonable hours at work' at its suppliers in Bangladesh, India, China and Türkiye.

The member actively responded to these complaints as per Fair Wear's Complaints Procedure.

For example, one complaint in China was about six supervisors which were downgraded to line worker roles after merging with another factory. A group of six complainants, all in management positions, complained that due to the downsizing of the factory, one workshop was merged with other workshops. The complainants were unwilling to work in new positions and hoped they could still work in the same management positions, or the factory could legally terminate the labour contracts with them by providing economic compensation according to their seniority. The brand raised the complaint with the factory, after which the factory's HR department took the issue up. The complainants legally ended working relationships with the factory and received proper severance.

Another complaint in Bangladesh was about verbal and sexual harassment of a factory executive. The brand worked closely together with other brands at the factory and Fair Wear to address this complaint jointly, and discussed remediation and prevention actions with the factory. The accused was suspended from the factory floor and the factory conducted extra awareness training for workers and mid-level management on behavioural courtesy and company rules and regulations. The factory also issued a non-retaliation statement to its workers, empowering them to speak on such issues, and increased its monitoring of factory floors.

The s.Oliver Group included the outcome of these complaints to decide on further preventive actions in its supply chain, using the information from complaints for its overall monitoring strategy and factory risk assessments. For example, it included extra questions on gender to its audit methodology based on a complaint on sexual harassment, implemented multiple violence and harassment prevention training modules and analyses complaints for trends to understand in which regions or on which topics it needs to increase its monitoring efforts.

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 gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	4	6	0

Comment: The s.Oliver Group has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on factory communication and health and safety such as 'no awareness about the CoLP', 'no awareness about the worker representatives' or 'health and safety training for workers is not provided or inadequate' in the following training modules:

One FairPrice Introduction Training at one supplier in China.

Eight Violence and Harassment Prevention Programme modules at eight suppliers in Bangladesh, Indonesia and India.

Three Communication Programmes at three suppliers in Viet Nam and Indonesia.

Three Factory Dialogue Modules at three suppliers in Türkiye.

Fifteen Onboarding Training modules for suppliers and workers at fifteen suppliers in India, China, Türkiye and Bangladesh.

Even though it is not part of a CAP, the s.Oliver Group has implemented training on child labour at three suppliers in Bangladesh.

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: The s.Oliver Group followed up on all training results by discussing the outcomes with its suppliers and where applicable, defining follow-up actions. Additionally, the member used the results of the training as input for its human rights due diligence, by incorporating the training outcomes in its factory risk assessments and factory action plans.

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.	Insufficient	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.	0	4	0

Comment: The s.Oliver Group’s human rights due diligence system includes a responsible exit strategy, which is has discussed with all its suppliers. However, the responsible exit strategy includes the caveat that 'deviations from the exit strategy may be considered in cases of missing product compliance or services'.

In the past financial year, the member stopped with 127 suppliers. This number includes both suppliers that the brand ended its business relationship with, as well as suppliers that did not receive an order in the previous financial year. The responsible exit strategy has been applicable from March 2024 onwards and the brand is working on incorporating it in its digital management tool so ensure compliance. The member followed the steps in the responsible exit strategy, however it could not show how it had done this for a sampled factory where it had 40% leverage which was part of a sample.

Requirement: The s.Oliver Group must ensure it follows its exit strategy and must monitor the impact of its exit.

Recommendation: The s.Oliver Group should track how it has followed the responsible exit strategy when exiting its suppliers.

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.	Advanced	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.	6	6	0

Comment: The s.Oliver Group undertakes activities related to human rights that go beyond Fair Wear's scope. The brand audits some of its Tier 2 suppliers, both monitoring and following up on CAPs. Moreover, The s.Oliver Group has put in place efforts to prevent child labour which go beyond its own supply chain, offering vocational training to youngsters in Bangladesh in a joint project with Save the Children called the 'Young Workers Development Programme'. Finally, the s.Oliver Group aims for more transparency and traceability and has started to map its supply chain until tier 4. The brand publishes its supply chains on the product pages in its webshop.

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: The s.Oliver Group communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. By communicating about Fair Wear on its social media platforms, in its press releases and on its care labels and hangtags, the s.Oliver Group actively spreads the Fair Wear message. Additionally, the brands shares information on Fair Wear and the Code of Labour Practices with its retailers so they can accurately communicate about this in-store.

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

Comment: s.Oliver Group 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.	Intermediate	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.	2	4	0

Comment: The s.Oliver Group has submitted its social report, which is integrated into its Sustainability Report. However, the report does not yet include information on the most significant human rights risks in its supply chain, the company's action plans to prevent and mitigate human rights harms, or the most significant remediation actions per country and production location, including how it followed up on complaints. The s.Oliver Group published the report on its website, but it is only available in German so far.

Recommendation: Human rights due diligence reporting is an important tool for member companies to share their efforts with stakeholders transparently. Therefore, Fair Wear strongly recommends that the s.Oliver Group publishes the social report in line with the reporting requirements of Fair Wear's HRDD Policy which can be found in the 'Public reporting checklist'.

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: The s.Oliver Group reports on factory-level data. The member publishes its factory list (Tier 1 and Tier 2) on the Open Supply Hub. Moreover, through its partnership with Retraced, it also publishes the entire supply chain (Tier 1 - Tier 4) for selected products in its webshop.

The s.Oliver Group does not yet report on factory-level remediation results. The s.Oliver Group published its progress on sustainability KPIs and time bound targets for high-level improvement plans via the Partnership for Sustainable Textiles and participates in the research of the Fashion Transparency Index, however it has yet to disclose its time-bound prevention, remediation and mitigation actions on factory-level.

Recommendation: Fair Wear recommends s.Oliver Group to publish concrete remediation action for its suppliers. The brand could start by linking in its sustainability report to its reporting on sustainability through the Partnership for Sustainable Textiles and its reporting on factory grievances through Fair Wear.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Advanced	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.	6	6	0

Comment: The s.Oliver Group has a 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 includes triangulated information from external sources, such as its own audits which include worker and management interviews.

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 seven requirements:

'The s.Oliver Group must improve the inclusion of gender in its risk scoping and assessment.'

'The s.Oliver Group must start including a gender lens in the implementation of improvement or prevention actions.'

'The s.Oliver Group must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. The s.Oliver Group is expected to take an active role in discussing living wages with its suppliers.'

'The s.Oliver Group's social report needs to be submitted to Fair Wear.'

'The s.Oliver Group must have human rights risk monitoring that includes a responsible exit strategy.'

'The s.Oliver Group is expected to begin setting a target wage for its production locations.'

'The s.Oliver Group should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.'

The s.Oliver Group followed up on the first five requirements. Together, at least half of the requirements were addressed.

Recommendation: The s.Oliver Group is strongly recommended to address the requirements that are still outstanding.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Yes

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

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

Recommendations to Fair Wear

The s.Oliver Group recommends Fair Wear to improve its communication regarding complaints, as response times can be long and the brand is not always informed about status updates in the meantime.

Brand Performance Check details

Date of Brand Performance Check: **25-09-2024**

Conducted by: **Maaïke Rubenkamp**

Interviews with: **Thomas Lurz - Chief Human Resources Officer**

Sabrina Müller- Head of Global Sustainability & SRM

Simon Krause- Teamleader People & SRM

Albert Liu- Senior Manager Asia Social & Environmental Affairs

Jasmina Amadou- Junior Consultant Sustainability (People)

Marielle Thoma- Corporate Student – Global Sustainability & SRM

Philipp Blecic- Sourcing Director

Michèle Mayfarth- General Manager s.Oliver Agency Turkey

Janene Schmidt- Teamleader DCD Customs Competence Center