



## **Brand Performance Check**

**VAUDE Sport GmbH & Co. KG**

**Publication date: December 2024**

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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# Scoring overview

Total score: 166

Possible score: 208

Benchmarking Score: 80

Performance Benchmarking Category: Leader



## Summary:

Vaude has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 80, the member is placed in the Leader category.

After two years of high sales figures, 2023 was a difficult year for Vaude. Consumers were more hesitant because of growing inflation and general global uncertainties. In addition, several retailers selling Vaude products went bankrupt, decreasing the number of outlets for the company.

Despite these economic challenges, Vaude continued to improve and implement its human rights due diligence (HRDD) process. In 2023, the company completed its responsible business conduct policy, explaining its general approach to HRDD.

Vaude continues to produce in Myanmar, although continuous monitoring of the situation did lead to the decision to stop production at two production locations. With the owner of the remaining production location, Vaude started discussing the possibility of reducing order volume and moving to production locations in other countries, but there is no concrete exit strategy yet. To show continuous support to this location, it has committed to contributing to a living wage in 2024.

The company expanded its work related to gender, collecting more information from its factories, ensuring all production locations in Vietnam participated in a gender training organised by ILO Better Work and applying a gender lens to the production location actions.

Vaude also expanded its work on living wages through the development of its 'Vaude-share' methodology, which allows for specific living wage contributions for orders. This methodology combines an analysis of the wage gap in a specific factory with the labour cost component to determine the share Vaude has to pay to contribute to living wages for the company's part of production.

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 VAUDE Sport GmbH & Co. KG

## Member company information

Member since: 1 Jan 2010

Product types: Garments, clothing, fashion apparel, Outdoor products, Sports & activewear, Bags, Accessories, Outdoorwear, Footwear and Luggage & other travel accessories

Percentage of turnover of external brands resold 0%

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

Number of complaints received last financial year 8

## Basic requirements

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

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

Membership fee has been paid? Yes

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

Production Country	Number of production locations	Percentage of production volume
Viet Nam	19	52.77%
Myanmar	3	22.44%
Germany	3	10.63%
China	10	6.51%
Cambodia	2	4.86%
Portugal	4	1.74%
Lithuania	1	0.59%
Romania	1	0.18%
Taiwan	1	0.18%
Ukraine	1	0.08%
Austria	1	0.04%

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 8**

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1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: [Yes](#)

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: [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:** [Vaude discloses 100% 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:** Vaude discloses 100% 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: 72**

### 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:** Vaude has a sourcing strategy that addresses influencing labour conditions, as the decision where to source depends on its country and factory risk assessments. Vaude's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. This is shown in the figures because in the past financial year, Vaude had 46 active suppliers, compared to 48 in 2022. 82% of the production volume came from suppliers where the member had at least 10% leverage at suppliers, compared to 75% in 2022.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Intermediate	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.	4	6	0

**Comment:** Vaude's sourcing strategy focuses on maintaining long-term relationships, which it communicates to its suppliers in its Guidebook. 75% of the member's total FOB volume comes from suppliers with whom Vaude has had a business relationship for at least five years. Vaude starts making sourcing decisions and committing to producing in a specific production location two years before production. In the past financial year, the forecast was lower than in previous years.

**Recommendation:** Fair Wear recommends Vaude to more explicitly commit to long-term contracts.

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:** Vaude developed a risk analysis matrix in line with the OECD requirements. The matrix includes all sector risks and plots them for each country against the scale, scope, irremediability and mitigation already in place. In addition, Vaude has done a scoping of the business model risks as well as product-specific risks. Vaude uses this matrix to create a prioritisation of risks in its supply chain, using a traffic light system to indicate low, medium and high risks. Based on the risk assessment, it has adjusted its sourcing strategy, reducing production in Myanmar and China and started to prepare for production in Bangladesh, for example, by signing the International Accord.

To date, Vaude's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. It recognises that in most production countries, there are political restrictions on freedom of association and collective bargaining. Instead of influencing the political circumstances, Vaude works on directly improving conditions at the production sites. This includes, for example, measures to improve social dialogue, provide grievance mechanisms, and actively contribute to living wages.

Vaude continues production in Myanmar through a supplier with whom it has worked since 1994. In 2003, this supplier asked Vaude to relocate a small part of its production to Myanmar, and the company has been producing there ever since. Following Fair Wear's policy and expectations in Myanmar, Vaude is working with this supplier to relocate production to locations in other countries owned by the same supplier thereby slowly disengaging from Myanmar.

**Recommendation:** Fair Wear strongly recommends Vaude to privilege countries where workers can freely form or join a trade union and/or 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 Vaude to inform new suppliers about Fair Wear membership by sharing the Guidebook and Code of Labour Practices. This process has been followed for all suppliers added last year. Additionally, it is standard practice in the onboarding process to visit the supplier and have a dialogue about CSR/human rights and how the supplier and Vaude can cooperate on this topic. The attitude of the supplier management towards CSR and the willingness to change is an important decisive factor. In the past financial year, Vaude created an onboarding presentation as a new tool to present to new suppliers during an online onboarding session. In the past financial year, Vaude has worked on onboarding production locations in Bangladesh, while production will not start until 2025.

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

**Comment:** Vaude collects human rights information of potential new suppliers by collecting self-assessments and existing audit reports. Once all information is considered sufficient to build a relationship, Vaude visits the production location to check the factory set-up, as well as collect information on wages and working hours. The onboarding process includes information collection on grievance mechanisms, freedom of association and includes a dedicated form to collect information about the gender composition of the factor. The company does not collect information from workers or stakeholders to inform the sourcing decision.

**Recommendation:** Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

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

**Comment:** Vaude has shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business, as it is part of the onboarding process. The Worker Information Sheet has been posted. Together with other customers, Vaude implemented Fair Wear's new onboarding modules for the newly onboarded supplier.

Vaude does not yet have a structured way of organising introductory training on social dialogue for management.

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

## Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Advanced	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.	6	6	0

**Comment:** Vaude has a systematic approach to identifying human rights risks in its supply chain. Based on the factory risk assessment, it defines follow-up actions. The company still heavily relies on audits and full assessments, although it has also identified the need for training or regular on-site visits to address specific issues. In most countries, local Vaude staff regularly visits production locations to check on quality and process and collect supplier input. Sometimes, these visits also include worker interviews, either by the local staff or with the help of an interpreter. In Myanmar, Vaude monitors factory conditions through local auditors and by regular visits from Vaude staff.

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:** Vaude 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 such as underrepresentation or missing non-discrimination policies. 80% of Vaude's production comes from Vietnam, Myanmar, and China, where FoA is heavily restricted. Vaude uses the information from its country risk scoping to understand what the risks at specific suppliers are and inform itself how to engage with them on this topic. The member has supplier-level monitoring in place to assess and understand the specific risks to FoA at suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, to foster a better understanding of gendered implications.	Advanced	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.	6	6	0

**Comment:** Vaude could show it understands the basic gender risks for its sourcing countries, and for instance, identified discrimination, unequal opportunities and violence and harassment as important risks prevalent in all its sourcing countries. Vaude's annual wage survey collects gender-specific data on general workforce composition, information about contracts, job categories and wages. The data has been analysed, and conclusions were incorporated into the action plans for countries, focusing on the gender pay gap in Bangladesh and non-discrimination policies in Vietnam.

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

**Comment:** Vaude used to have a strong and systematic evaluation system for assessing suppliers' human rights performance. This system included evaluating all supplier information, including audits, visits, training, and surveys, based on a set framework. In 2023, Vaude changed its internal filing system, which caused the original evaluation system to no longer function. Therefore, the company did not do a systematic evaluation of its suppliers' human rights performance. In the past financial year, Vaude included ad hoc supplier evaluations whenever issues came up.

**Recommendation:** Fair Wear recommends the member to ensure that the evaluation of human rights performance of its suppliers is systematically considered in purchasing decisions.

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:** Vaude uses the outcomes of its human rights monitoring (onsite assessments and staff visits) to respond to unauthorised subcontracting. The database does not show any evidence of missing first-tier locations.

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:** Vaude asks factories explicitly about homeworkers at the start of the business relationship. None of the factories indicated they use homeworkers. During factory visits, Vaude staff checks that all production happens onsite.

## 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.	Intermediate	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.	2	4	0

**Comment:** Vaude signs a framework agreement with its manufacturers, which forms the basis of all orders. Although the framework agreement is accompanied by the Vaude Guidebook and Code of Labour Practices, the agreement itself does not support the implementation of human rights due diligence.

Agreements on individual orders are made separately in a term sheet, which also states the payment terms. The shared terms sheets stated payment 30 days after the goods leave the factory.

Vaude is currently reviewing the framework agreement and looking at the principles set out in the Common Framework of Responsible Purchasing Practices (CFRPP). The company also looked into the Supplier Model Contract Clauses and will update its contract documents based on them.

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

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

**Comment:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The main instrument is the CSR roadmap, which outlines priorities and is discussed with top management every three months. The member has not yet included KPIs supporting good sourcing and pricing strategies for sourcing and purchasing staff.

**Recommendation:** Vaude could 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.	Advanced	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	6	6	0

**Comment:** Already in the design phase of the product, a meeting takes place about which factory can produce the product. By involving the product development department in this process, the chances of late design changes occurring are decreased. Vaude requests the capacity of the suppliers in the evaluation process of the supplier. This information then feeds into the strategy for new products. Approximately nine months before delivery, Vaude and the supplier agree on order quantities per style and the estimated delivery date. The forecast is agreed upon with suppliers according to capacity. Vaude double-checks its suppliers' capacity in pieces per season. Vaude wants to know precisely how many of the to-be-ordered styles the suppliers can do per season and per month. The manufacturers indicate whether the proposed shipment dates are feasible, including the time needed for the fabric to arrive. If not, a new date is agreed upon.

As Vaude works with two seasons and has many never-out-of-stock (NOS) styles, Vaude makes use of the low season for its production as much as possible. Where possible, Vaude gives long lead times (one year) to manufacturers. This way, the manufacturer can decide when to work on the products and fill up gaps throughout the year. When deliveries are late, Vaude uses air freight so that there is no additional pressure on workers. Vaude fully covers the costs of this airfreight.

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.	Basic	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.	2	6	0

**Comment:** Vaude collects information about wage levels at all its suppliers using audits and wage surveys. The brand compares the prevailing wage levels with living wage estimates when available, but struggles with the lack of credible living wage estimates in some of its production countries.

Vaude has worked on an internal living wage strategy that the brand will implement in the coming years. A key element of this strategy has been gaining insight into labour costs. In the past year, the company gained insights into the labour costs associated with different product styles. Vaude is including the requirement of open costing in its supplier Guidebook.

Although the company's knowledge and understanding of the labour costs of its product is in development, Vaude does not calculate labour minutes per style, which would allow sufficient insight into the labour cost per product style. Therefore, it cannot know exactly whether the prices it pays suffice for the payment of legal minimum wages.

**Recommendation:** Vaude 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:** For a part of its production, Vaude works with vendors with headquarters in Taiwan, Korea or China, while production locations are elsewhere in Asia. Vaude will mainly communicate with these headquarters and expect them to inform the production locations. All information regarding the Code of Labour Practices is shared with the headquarters and directly with production locations. Vaude expects headquarters to also be involved in audit follow-up. Vaude's local experts regularly visit all production locations to support the implementation of the CoLP.

**Recommendation:** Vaude is recommended to check if the intermediary's purchasing practices are fair and if the intermediary has adequate systems to ensure payments are made on time.



## Layer 3 Prevention, mitigation and remediation

**Possible Points: 96**

**Earned Points: 76**

### Indicators on the quality and coherence of a members' prevention and remediation system

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

**Comment:** Vaude has identified prevention and mitigation measures per country, this influences actions per factory. Currently, the company manages its factory risk prioritisation and general risk identification separately, and has not created an explicit connection between the two. Vaude could show, however, that they have translated the risk identification into factory risk assessments and drafted follow-up action plans for all factories.

Each quarter, Vaude hands in a Myanmar progress report per factory, covering the following focus areas: FoA and access to remedy, grievance mechanisms, forced labour, economic linkages to the military, security risks, addressing salient risks (OT, wages, unfair dismissal), credible information and reporting, the action plans have been detailed.

**Recommendation:** Fair Wear recommends Vaude to ensure the link between its general risk scoping and the specific factory assessments.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Intermediate	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	4	6	0

**Comment:** Vaude started to collect gender-disaggregated data per factory and has identified gender-specific actions related to training, FoA, wages and childcare in most of its factory action plans.

**Recommendation:** Vaude is recommended to extend implementing the gender lens it included in its 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:** Vaude included comprehensive steps to encourage FoA and effective social dialogue in some of its follow-up actions. These steps involve collecting more information regarding FoA in production locations and investigating possibilities to support social dialogue. For some factories, Vaude started to implement preventive action, such as training on effective internal dialogue and helping to improve their internal grievance mechanism.

**Recommendation:** Vaude is strongly encouraged to ensure worker representatives are involved in the steps that the member takes to promote freedom of association and effective social dialogue.

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:** Vaude actively supports and monitors the effectiveness of internal grievance mechanisms. The company collected information on internal grievance mechanisms and their effectiveness. The conclusion was that only one supplier had an effective internal grievance mechanism. For all other factories, Vaude has identified follow-up actions related to worker and management training.

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:** Vaude cooperates with other customers (Fair Wear members and others) at its shared suppliers, responding to CAPs and complaints. It also cooperates in organising training at production locations.

### Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	70%	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, Vaude could demonstrate by using the Fair Wear member hub that more than two-thirds of the CAP issues requiring improvement actions have been addressed. To address CAP findings, Vaude first collects documentation and factory feedback and then schedules a factory visit to follow up on individual findings.

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

**Comment:** Vaude provides an overview outlining the root causes of all issues and concludes that the main root causes are underperforming factory management or a lack of knowledge on specific topics. In the past financial year, Vaude has focused specifically on improving internal dialogue and internal grievance mechanisms.

**Recommendation:** Fair Wear recommends Vaude to identify root causes of CAP issues together with its suppliers.

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.	Basic	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.	2	6	0

**Comment:** Vaude has some suppliers in Europe where improvement or prevention programmes are not needed. These cover 12% of the member's total FOB and include Vaude's own production in Tettang. Vaude audited the factories to establish the risk profile, but there were hardly any findings, and the ones that did come up were remediated quickly. Vaude is in regular contact to discuss developments regarding human rights. It has not included worker representatives or local unions in these discussions.

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

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

**Comment:** Although Vaude's planning system supports reasonable working hours, excessive overtime still occurs at Vaude's suppliers. In 2023, three Fair Wear assessments and two complaints indicated problems regarding excessive overtime in Vaude's production locations.

When excessive overtime is found, this is discussed with the supplier, and Vaude explains the brand does not want its products to be made using excessive overtime. In 2023, planning and deliveries were highly impacted by the global economic situation (high energy prices, political instability), which caused some of the overtime. Vaude's local representatives in China and Vietnam are involved in finding the root causes of excessive overtime in the suppliers. Possible root causes in China are, according to Vaude's local colleague, the internal planning of the factory, short lead times, late information about the design, and delays in fabric supply. Vaude works on these root causes through its general planning system (see 2.15), for example, by ordering up to a year in advance, but finds not all customers are interested in working on this, which can lead to excessive overtime still occurring. Vaude's local colleagues are used to getting insight into the capacity of the factories, and when they see a supplier is overbooked, they indicate this to Vaude Headquarters so the purchasing department can take this into account. The purchasing/planning department is informed of findings of excessive overtime but is not involved in remediation.

Since a few years, Vaude has a year-round program in place to work on revealing the root causes of excessive overtime, which the brand was planning to implement at one factory per year.

**Recommendation:** With its suppliers where excessive overtime occurs, Fair Wear recommends Vaude 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.

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.	Intermediate	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	2	4	-2

**Comment:** In the previous financial year, two Fair Wear assessments included findings regarding non-payment of legal minimum wage or legally required wage elements or indicated wages could not be verified. Both cases are in the process of being remediated.

**Recommendation:** Fair Wear strongly recommends Vaude to always verify whether legal minimum wage issues have been resolved in case factory management claims so. Vaude could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check remediation.



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.	Advanced	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.	6	6	0

**Comment:** Vaude clearly understands wage levels. It has made a detailed analysis by comparing wage levels per factory with the Global Living Wage Coalition's (GLWC) living wage estimates and the legal minimum wage. Vaude found that the regular wages of sewing operators at its factories in Vietnam are close to or above the GLWC estimates.

In 2021, Vaude created a 'Living wage roadmap'. The roadmap is an extensive and systemic plan that details the steps the brand needs to take to achieve this goal, following Fair Wear's living wage increase cycle. Vaude's top management agreed upon the plan. In 2023, Vaude continued implementing the roadmap.

Vaude started discussing with some of its suppliers why wages are below the living wage and focused on what the brand could do by creating a detailed living wage strategy. In 2023, Vaude developed its Vaude-share methodology to start actively contributing to higher wages.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	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.	4	6	0

**Comment:** In 2023, Vaude developed its 'Vaude-share' methodology, which allows for specific living wage contributions per order for specific factories. This methodology combines an analysis of the wage gap in a specific factory with the labour cost component to determine the share Vaude has to pay to contribute to living wages for the company's part of production. The first payout will happen in 2024.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	4%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

**Comment:** The latest analysis of the wages in Vaude's production locations included a reevaluation of the living wage estimate used. This showed that in 2023, one factory in Cambodia's average monthly wage was above the living wage estimate provided by the Global Living Wage Coalition for 2023. This factory accounts for 4% of the company's FOB. Vaude's active contribution to a higher wage through its Vaude-share methodology will happen in 2024.

**Recommendation:** Vaude is encouraged to roll out its approach to all suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear'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:** Vaude always takes immediate action when complaints come in. It shares information about complaints and remediation steps taken with Vaude staff and with other factories to prevent similar problems from occurring at different factories. Vaude uses the Fair Wear database to keep track of all incoming complaints, communication about follow-up, and feedback from the complaints handler, factory, and complainant.

In 2023, Vaude received eight complaints. Four from one production location in China, related to Living wage, Reasonable hours of work and Legally binding employment relationship. Vaude followed up on these complaints but as management did not agree with the allegations and threatened to take this to court, it was not possible to gather the documentation necessary to support the investigation and remediation of the case, and the complaints, therefore, needed to be closed. This process contributed to Vaude's decision to disengage from this production location.

Three complaints came from two locations in Myanmar. One was related to verbal abuse. This was addressed and resolved by establishing a stricter warning process that would put explicit consequences on such behaviour. Vaude was able to show that this now works because they received regular updates from the factory about the implementation and results of the process. Another one was related to wages, which led to Vaude's decision to start here with its Vaude-share approach. The last one was resolved as soon as it was shared with the factory.

The last complaint came from a production location in Vietnam and concerned the discontinuation of workers' contracts. Vaude contributed to ensuring all workers received their legally required benefits.

Vaude analyses all complaints received every year to make a plan for how to work on root causes and recurring issues and integrates this into the factory risk profile and follow-up action plans.

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:** Vaude has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on limited awareness about the Code of Labour Practices or Health and Safety measures in relevant training modules, either provided by Fair Wear, Vaude's local team or external organisations. In addition, it has enrolled its Vietnamese production locations in training organised by ILO Better Work on raising awareness of gender inequality.

**Recommendation:** Vaude is recommended to implement training for all factories where this follows from the systematic factory risk assessment.

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:** Vaude uses training reports as part of its continuous monitoring of production locations. The training results are used as input for its human rights due diligence, reassessing the likelihood of specific potential harms at the factory or country level.

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

**Comment:** Vaude’s human rights risk monitoring includes a responsible exit strategy, which is communicated to all suppliers through the Vaude Guidebook from the start of the business relationship. In 2023, Vaude decided to stop production at two of its locations in Myanmar. This decision will result in the closure of the production locations. The Taiwanese owner of the locations has shared a detailed plan with Vaude on how to support workers. During the disengagement process, Vaude local staff was onsite to monitor the process.

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.	Basic	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.	2	6	0

**Comment:** Vaude undertakes activities beyond Fair Wear scope, by ensuring all tier 2 locations sign the Code of Labour Practices and go through the Vaude onboarding process.

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

**Possible Points: 22**

**Earned Points: 18**

### 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:** Communication about Fair Wear membership and the leader status adheres to the Fair Wear communication policy. Fair Wear membership is communicated through the company's website, on catalogs, on social media, youtube and through company presentations. Fair Wear is actively communicated within the dealers network through a dealers newsletter and workbook.

Vaude is actively involved in the German Partnership for Sustainable Textiles (PST) and other stakeholder platforms where it regularly informs the public and its stakeholders about Fair Wear membership. The CEO of Vaude also frequently shares information about Fair Wear membership during panels and interviews.

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:** Vaude does not sell external brands.



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

**Comment:** Vaude has submitted its social report, which Fair Wear approved. Vaude has also published the report on its website.

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

**Comment:** Vaude published its social report, which includes some factory-level data and remediation results, on its website.

**Recommendation:** Fair Wear recommends Vaude publish concrete remediation actions for its suppliers.

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

**Comment:** Vaude has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations, this is called the CSR roadmap. The internal evaluation system involves top management, as the updates regarding the CSR roadmap are discussed with top management every three months. In its evaluation system, the member does not yet include triangulated information from external sources.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Advanced	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.	4	4	-2

**Comment:** The previous performance check included requirements on finalising the responsible business conduct policy and more timely publication of the social report. Both have been addressed.

## 5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: [Not applicable](#)

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: [Not applicable](#)

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

## Recommendations to Fair Wear

Vaude has some recommendations for Fair Wear:

It would be good to look into GDPR regulation regarding the grievance mechanism.

Vaude indicated that when it addresses things to Fair Wear, the organisation makes promises, but does not followed up. Sometimes the follow-up could be more pragmatic and fast, more action and less talking.

Vaude would like to be more involved in ongoing developments, such as the Accountability Framework.

The process of reporting for brands sourcing in Myanmar is too bureaucratic. Vaude did not get feedback or suggestions for improvement and wondered whether people had looked at it.

In the past financial year, Vaude would have liked more support around living wages from Fair Wear.

# Brand Performance Check details

Date of Brand Performance Check: **24-10-2024**

Conducted by: **Anne van Lakerveld**

Interviews with: **Susanne Medesi, Head of Vendor Management**

**Anika Mauz, Vendor Management**

**Pascal Erath, Vendor Management**

**Hucky Hu, Vendor Management**

**Mary Minh: General Manager Vaude representative office Vietnam**

**Lucy Cao: Vendor Management**