



Brand Performance Check

Greiff Mode GmbH & Co. KG

Publication date: January 2024

This report covers the evaluation period 01-05-2022 to 30-04-2023

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: 58

Possible score: 206

Benchmarking Score: 28

Performance Benchmarking Category: Needs Improvement



Summary:

Greiff Mode GmbH & Co. KG (Greiff) has shown insufficient progress on performance indicators. With a total benchmarking score of 28, the member is placed in the Needs Improvement category.

The member has scored insufficient on some repeated non-compliance indicators. These need to be resolved in the next performance check, else Greiff will be automatically placed in Needs Improvement.

Greiff has a sourcing strategy that focuses on maintaining long-term relationships. During the performance check the member company could not show documentation for its risk scoping. Greiff had difficulty logging in to the online tool called T-Rexs from The German Partnership for Sustainable Textiles, where its risk scoping is conducted. Risk scoping and risk assessment are essential to companies' HRDD and the performance check. Therefore, the quality and coherence of the prevention and remediation system and the implementation of improvement and prevention programmes could not be verified. The member company has not shown progress in its living wage process. Greiff is highly recommended to raise awareness and integrate HRDD requirements into its sourcing and purchasing actions.

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 this is a transition year, Fair Wear lowered the scoring threshold for this year only.

Performance Category Overview

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

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

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

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

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

Company Profile Greiff Mode GmbH & Co. KG

Member company information

Member since: 1 Jan 2015

Product types: Workwear and Corporate Wear

Percentage of CMT production versus support processes 93%

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

Percentage of FOB purchased directly 91%

Percentage of FOB purchased through agents or intermediaries 39%

Percentage of turnover of external brands resold 20%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's/Organisations Partnership for Sustainable Textiles, Grüner Knopf, Summations, OEKOTEX,

Number of complaints received last financial year 1

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
Ukraine	2	33%
Morocco	2	21.39%
Bosnia and Herzegovina	1	13.73%
Portugal	1	7.45%
North Macedonia	2	6.69%
Pakistan	2	6.39%
Romania	1	3.48%
China	1	3.07%
Viet Nam	1	2.82%
Germany	2	1.98%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 7

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: No

Comment: Greiff does not yet have a Responsible Business Conduct Policy.

Requirement: Greiff needs to develop a Responsible Business Conduct policy.

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

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

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

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

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

Comment: Greiff discloses 93% 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: Greiff discloses 93% 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: 30

Indicators on Sourcing strategy

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

Comment: Greiff has a sourcing strategy addressing influencing labour conditions. The member has 15 active suppliers. 82% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 97% of the production volume comes from suppliers where Greiff buys less than 2% of its total FOB. This is comparable to the previous year. Greiff sourcing strategy explicitly focuses on increasing influence through consolidation.

Recommendation: Greiff could include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers.

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: Greiff has a sourcing strategy that focuses on maintaining long-term relationships. 99% of the member's total FOB volume comes from suppliers with whom Greiff has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Greiff to 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.	Insufficient	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.	-2	6	-2

Comment: Greiff could not demonstrate evidence for its risk scoping. During the performance check, Greiff had difficulty logging in to the used online tool called T-Rexs from The German Partnership for Sustainable Textiles, where its risk scoping is conducted.

Requirement: Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year in a row, will be placed in the 'needs improvement' category.

Greiff needs to show documentation of its risks scoping in its supply chain.

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.	Intermediate	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.	2	4	0

Comment: It is the standard process for Greiff to inform new suppliers about Fair Wear membership by sending the Fair Wear questionnaire. This process has been followed for all two suppliers added last year. However, the brand has not yet had a dialogue with its suppliers about Fair Wear's requirements and how to cooperate in implementing them.

Recommendation: Greiff is recommended to engage in dialogue with all 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.	Basic	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.	2	6	0

Comment: Greiff collects human rights information of potential new suppliers by collecting questionnaires and existing audit reports. The company did not adjust sourcing decisions based on the collected information. Greiff does not collect information from workers or stakeholders to inform the sourcing decision. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order. Fair Wear recommends Greiff to investigate whether an operational grievance mechanism exists. Fair Wear strongly recommends Greiff to privilege suppliers 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
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Insufficient	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.	0	6	0

Comment: Greiff has added two new suppliers. Greiff has not shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet (WIS) has been posted at the two new suppliers but has still to be posted for two German and one Pakistani suppliers. This was already a finding in the previous check. For two suppliers from North Macedonia and China, the member uses an old WIS with an old number. Greiff has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue.

Requirement: Greiff must ensure that factory management is aware of the Fair Wear CoLP and the complaints helpline within the first year of starting business. The Worker Information Sheet needs to be posted at a place easily accessible for workers.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	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: Greiff has an ad hoc approach to identifying human rights risks in its supply chain. The company uses audits, CAPs and visits as monitoring tools. Greiff had difficulty logging in to the online tool called T-Rexs from The German Partnership for Sustainable Textiles, where its risk scoping is conducted.

Recommendation: Fair Wear recommends Greiff to approach monitoring systematically, identifying the appropriate monitoring tool and frequency depending on the outcome of the risk scoping and risk assessment.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Insufficient	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.	0	6	0

Comment: Greiff has not yet mapped the risks to FoA for its sourcing countries. Greiff is not familiar with Tool 1 of the FoA Guide (or other tools to collect country-specific information) and is not aware of what the general risks to FoA are in its sourcing countries.

Requirement: Greiff must map the risks to FoA for the countries it sources from and understand if FoA is respected by its suppliers. The member should familiarise itself with Tool 1 of the FoA Guide (or other tools to collect country-specific information).

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Insufficient	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.	0	6	0

Comment: Greiff cannot show documentation for its risk scoping. Greiff has not included gender in its risk scoping.

Requirement: Greiff should show documentation on its risk scoping and assessment, and gender should be included in this exercise.

Recommendation: Fair Wear strongly recommends Greiff to enrol in the Introduction to Gender Equality programme on Fair Wear's learning platform.

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

Comment: Suppliers' human rights performance is evaluated systematically every year. Greiff has an integrated evaluation system for each production location; it includes supplier prices, product quality, delivery timelines, supplier service and social compliance. The member's different departments conduct the evaluation; for the social compliance evaluation, the eight Code of Labour Practices (CoLP) and the outcomes of audits are included. Greiff does not link the evaluation results with a reward system in the form of, e.g. increased orders or long-term contracts. Occasionally, the outcome of this evaluation influences purchasing decisions. In the past, Greiff terminated its cooperation with a supplier from Türkiye due to poor evaluation results. Greiff has not yet shared the evaluation outcome with its suppliers and their worker representatives.

Recommendation: Fair Wear recommends Greiff to share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives.

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.	Intermediate	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.	2	4	0

Comment: Greiff uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. One first-tier location in Germany was missing in the database. Greiff was unaware that this location also falls under the Fair Wear scope. The member takes measures to prevent unauthorised subcontracting or unknown locations, such as visits during production, assessing the capabilities, and checking whether it is realistic to expect the order to be made entirely in-house. Greiff has taken steps to get more transparency deeper in its supply chain. With the myGREIFF-Code, the member is aware of all production partners used for its NOS products. This contributes to minimising the risk of unauthorised subcontracting. The myGREIFF-Code can be found labelled on each of its NOS-garments. The whole process of product making can be traced – from the fibre to the finished item of clothing.

Recommendation: Greiff is strongly recommended to add its missing first-tier location in Germany to the database.

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: Greiff has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because of its kind of products. Besides, the member had a conversation with its suppliers and analysed suppliers' capacity to identify a potential risk.

Indicators on Responsible purchasing practices

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

Comment: Greiff does not use contracts with its suppliers. The member has agreements in the form of purchase orders and sustainability guidelines that stipulate payment terms, liability and penalties. These agreements do not support human rights due diligence because an unequal burden is placed on the suppliers by not sharing responsibility for CoLP implementation and very general payment terms (e.g. payment after acceptance of the delivery at Greiff, the member did not include the number of days for its payments). The company has no regulation in its agreement in case of late deliveries. Greiff holds its suppliers liable for quality claims until four weeks after arrival at the company without considering the fault source.

Requirement: Greiff needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence.

Recommendation: Fair Wear strongly recommends that Greiff includes regulation for late delivery in its contracts, or at least ensure there is 'proof of fault by the supplier'. Greiff 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 their decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: Greiff shares relevant CSR information with other departments. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	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.	4	6	0

Comment: Greiff has two types of products: Never Out of Stock items (NOS, 85%) and specific products that are being ordered by customers (15%). The catalogues of the NOS items have a validity of two years; therefore, a high or low season does not exist. Greiff provides its suppliers with a 12-month forecast of its production planning for the NOS products. The planning is then adjusted regarding the feedback from the production locations about their available hours per month and production stage. The member asks for the supplier's capacities and conducts feasibility checks. Greiff does not yet know all the planning in production minutes of its suppliers. The lead time for suppliers from Europe and Africa is five weeks. Greiff buys the fabric and sends it to the factories. For Pakistan and Vietnam, the lead time is between 16 to 26 weeks. These production locations supply ready-made garments. Greiff has a large stock and can respond to clients' demands. This enables Greiff to accept some degree of delay from the suppliers that supply the NOS items. For these items, the production status is reconfirmed daily. Delays of fabric are monitored and handled by Greiff. It does not influence the lead time for its suppliers. The member increased its production volume by around 35% compared to the previous year and placed more orders at all production sites. To extend the production volume and reduce the pressure, Greiff started working with a new supplier.

Recommendation: Greiff could use the Fair Working Hours Guide to assess its purchasing practices and potential impact on working hours and discuss this with its suppliers. Fair Wear recommends the member to explore planning production in minutes instead of pieces to assess better its suppliers' production capacity (and wage levels). Furthermore, at suppliers where Greiff is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season. Because of the increased volumes, the member is encouraged to evaluate production and the impact on working hours with suppliers.

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

Comment: Greiff has a basic understanding of the wage levels at its suppliers and does not connect this understanding to its own buying prices. The member has no insight into the labour component of its prices. Greiff does not know the number of actual sewing minutes needed for a style. Greiff does not know the labour minute value at all of its suppliers.

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

Recommendation: Greiff is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown, for example, using the Fair Price app.

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

Comment: Greiff has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support the implementation of the CoLP by visiting the factories and discussing CAP follow-up. Besides, Greiff has direct contact with all factories. The member checks if its intermediaries uphold the purchasing practices mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Layer 3 Prevention, mitigation and remediation

Possible Points: 90

Earned Points: 18

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 prioritisation and follow-up programmes according to the risk profile.	Insufficient	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.	0	6	0

Comment: During the performance check, Greiff could not show documentation for its risk scoping and the drafted follow-up plans. Greiff had difficulty logging in to the online tool called T-Rexs from The German Partnership for Sustainable Textiles, where its risk scoping is conducted.

Requirement: Greiff is required to ensure that prioritisation in follow-up matches the factory's risk profile.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Insufficient	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.	0	6	0

Comment: Greiff has not included a gender lens in its risk scoping (as described in indicator 2.9). Therefore, the member has not yet applied any gender lens in its improvement and prevention steps.

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

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

Comment: Greiff could not show its assessment of risks to FoA and social dialogue (see indicator 2.8). The member has not yet included steps to encourage FoA and effective social dialogue in its improvement or prevention actions.

Recommendation: Greiff is strongly encouraged to include steps to promote FoA and social dialogue in its improvement or prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Insufficient	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.	0	6	0

Comment: Greiff does not assess its suppliers' internal grievance mechanisms at the start of a business relationship. This is not part of the member's onboarding process. Greiff does not actively support and monitor the effectiveness of internal grievance mechanisms.

Requirement: Greiff needs to assess the existence and functioning of internal grievance mechanisms systematically; it also needs to support and monitor its functioning.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Intermediate	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.	4	6	0

Comment: Greiff cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers that are not shared with other members, Greiff works together with other customers on audit findings and complaints. Greiff has yet to start cooperation on taking preventive measures.

Recommendation: We recommend Greiff to also work together on preventing human rights violations.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	5%	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.	2	6	-2

Comment: In the past financial year, Greiff has received three audit reports. During the performance check, the member could demonstrate with a sample that 5 % of the CAP issues requiring improvement actions have been followed up. Examples of improvement actions that were taken include improving worker contracts and health & safety findings. Greiff did not follow up on more structural issues.

Recommendation: Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of Greiff to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the resources needed to be able to work on improvement actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Insufficient 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.	-2	6	-2

Comment: Greiff has not yet identified root causes of the CAP findings (other than excessive overtime assessed under indicator 3.9 or living wage assessed under indicator 3.11).

Requirement: Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

Greiff should identify root causes of CAP issues and discuss these with its suppliers. The member needs to start developing preventive actions to address these root causes.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	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: Greiff has some suppliers where improvement or prevention steps are not needed. These cover 9% of the member's total FOB. The member does not have a system to ensure possible human rights risks are regularly discussed with these suppliers. Greiff irregularly reviews changes to the risk situation.

Recommendation: Greiff is recommended to create a systematic plan which details at which interval the member will discuss possible human rights risks at its suppliers and which human rights risks should be discussed.

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

Comment: In the previous year, no audit report of the total three audits mentions excessive overtime. Greiff analysed the root causes of excessive overtime. According to the member, leaving staff and poor planning of other customers are significant causes for excessive overtime. The member has taken action to address the root causes. Greiff accepts delays in delivery because it has some flexibility in its planning and informs its customers accordingly. The member built up high stock levels, so it can delay some of its recurring NOS orders, which usually can be moved to less busy months. Moreover, Greiff prioritises customer orders over its NOS orders. In case of urgency, part delivery via airfreight at company expenses is possible.

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 year, one out of three audits included findings regarding non-payment of legal minimum wage. One factory did not use electronic time recording. Therefore, time records could not be sufficiently verified. Greiff responded immediately to these findings by discussing them with the factory. After that, the factory installed an electronic time recording system. The member brand did not verify the time- and wage records by a third party afterwards.

Recommendation: Fair Wear strongly recommends Greiff to always verify whether legal minimum wage issues have been resolved in case factory management claims so. Greiff 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.	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: Greiff has a basic overview of the wage levels at its suppliers. Greiff discusses generally the topic of wages with some of its suppliers. Greiff yet needs to understand which suppliers pay wages below living wage estimates as a consequence of the member's policies/actions. The member company has yet to do a thorough root-cause analysis to find out why wages at suppliers are below the living wage.

Recommendation: Fair Wear recommends Greiff to enrol in the Living Wage programme on Fair Wear's learning platform. Members can help suppliers maintain their wage levels by, for instance, linking them to relevant governmental support programmes, or offering pre-payments or loans.

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

Comment: Greiff does not have a strategy on how to finance wage increases at its suppliers.

Requirement: Greiff should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: Fair Wear recommends Greiff to enrol in the Living Wage programme on Fair Wear's learning platform.

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%	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: Greiff does not contribute to higher wages at any of its production locations.

Requirement: Greiff is expected to begin setting a target wage for its production locations.

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

Comment: Greiff received one complaint in the past financial year about living wage and legally binding employment relationships at its suppliers in Pakistan. The member actively responded to these complaints per Fair Wear's Complaints Procedure. The resolution process of the complaint in Pakistan is still ongoing, with the brand actively working towards a satisfactory outcome. The international trade unions raised the complaint on behalf of 18 workers regarding unfair dismissal and pending severance payments. The complaint is still at the Pakistani court and, therefore, not closed.

Recommendation: Greiff could use the outcome of complaints to determine follow-up actions in its broader improvement and prevention plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Insufficient	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.	0	6	0

Comment: Greiff cannot show documentation for its risk scoping and the drafted follow-up plans. The member company did not implement any training in the past three years.

Requirement: Greiff needs to implement training per the requirements in its improvement and prevention programmes.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	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.	N/A	6	0

Comment: Greiff did not implement training at its suppliers (NA).

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

Comment: Greiff human rights risk monitoring includes a responsible exit strategy. In the past financial year, the member did not stop working with suppliers. The company did not share the responsible exit strategy with its suppliers.

Recommendation: Greiff could include the responsible exit strategy in its suppliers' agreement or contract.

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

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

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 26

Earned Points: 10

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Intermediate	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.	2	4	0

Comment: Greiff communicates accurately about Fair Wear membership on its website.

Recommendation: Greiff could develop materials about Fair Wear membership to share with retailers and (web)shops. The Fair Wear third-party resellers flyer can support in explaining Fair Wear, Fair Wear's work and the communication rules for third parties.

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).	Insufficient	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.	0	4	0

Comment: Greiff sells external brands. The member stated it has collected questionnaires for 37 external brands, but could not show any proof. Greiff has not collected further information about the human rights due diligence of these brands. The information that Greiff collects does not influence decision-making on which brands it sells. Four of the 72 external brands are members of a credible initiative, of Fair Wear and the Fair Labour Association.

Requirement: Greiff is required to collect information about the human rights due diligence efforts of the external brands it resells. This information could be considered in decision-making about which brands to sell.

Recommendation: Greiff is recommended to select external brands that are members of a credible initiative.

Indicators related to brand and supply chain transparency

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

Comment: Greiff has submitted its social report. Greiff 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: Greiff reports on factory-level data and remediation results. Greiff published its social report, which includes some factory-level data and remediation results, on its website. The factory-level data Greiff included are CAPs, complaint follow-up and remediation results. Greiff has yet to disclose its time-bound improvement plans.

Recommendation: Fair Wear recommends Greiff to publish time-bound plans for its suppliers.

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

Comment: The internal evaluation system involves top management. In its evaluation system, the member does not yet include triangulated information from external sources, such as workers and suppliers.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Insufficient	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	-2	4	-2

Comment: The previous performance check included the following requirements: Living wages - Greiff should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. Complaints handling - Greiff must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in the German factories and the Pakistani supplier in a location accessible to all workers. Greiff should check using a visit whether the Worker Information Sheet is posted in the factories. Greiff did not follow up on the requirements. The member did not analyse and develop a strategy to finance the costs of wage increases and could not show proof of the missing Worker Information Sheets or the requested visits to the factories.

Requirement: Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

It is required to work towards remediation of previous requirements from the last Brand Performance. The requirements included in this check need to be 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

Greiff would like Fair Wear to do more advertising.

Brand Performance Check details

Date of Brand Performance Check: 07-11-2023

Conducted by: Adele Kolos

Interviews with: - Daniel Clocuh - Head of Purchasing and Product Management

- Jens Möller - Managing Director

- Nicole Wagner - CSR Manager

- Robert Pröll - Technical Manager