



# **Brand Performance Check**

## **Blutsgeschwister GmbH**

This report covers the evaluation period 01-01-2022 to 31-12-2022

## 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: 132

Possible score: 204

Benchmarking Score: 65

Performance Benchmarking Category: Leader



Sourcing strategy

59%



Identifying continuous human rights risks

73%



Responsible purchasing practices

77%



Quality and coherence of prevention and remediation system

40%



Improvement and prevention

67%



Communication, transparency and evaluation

78%

## Summary:

Blutgeschwister GmbH (Blutgeschwister) has shown progress and met most performance indicators results. With a total benchmarking score of 65, the member is placed in the Leader category.

Blutgeschwister's sourcing strategy shows the company's commitment to long-term relationships and jointly improving labour conditions. In addition, the brand's strategy is to onboard only new suppliers already committed to human rights and improving working conditions.

Blutgeschwister developed a risk analysis matrix in line with the OECD requirements, focusing on all different kinds of risks, including environmental ones. Blutgeschwister uses this matrix to prioritise risks in its supply chain, using a traffic light system to indicate low, medium and high risks. The brand's strong and systematic supplier evaluation system includes CSR indicators and is shared with suppliers. From the next financial year (2023), Blutgeschwister will use the evaluation system to strengthen its CSR action plan.

In 2022, Blutgeschwister adjusted its sourcing strategy to reduce human rights risk in its supply chain. In particular, the brand has decided to source only from suppliers who are committed to human and labour rights. Blutgeschwister has also collected and analysed gender-disaggregated wage data and discussed it with some suppliers.

Blutgeschwister has started to work to ensure its practices align with the OECD guidelines on Human Rights Due Diligence (HRDD) and seems well-placed to improve its practices further in the coming years.

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 members. 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 Blutsgeschwister GmbH

## Member company information

Member since: 1 Jan 2013

Product types: Garments, clothing, fashion apparel and Bags

Percentage of CMT production versus support processes 99%

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

Percentage of FOB purchased directly 66%

Percentage of FOB purchased through agents or intermediaries 82%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? Yes

FLA Member No

Member of other MSI's Partnership for Sustainable Textiles, GOTS,

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? 1

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

Production Country	Number of production locations	Percentage of production volume
China	10	51
India	8	31
Lithuania	1	10
Portugal	5	9

## Layer 1 Foundational system's criteria

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

**Comment & Requirement:** Blutsgeschwister needs to improve its Responsible Business Conduct Policy, to ensure better alignment with the OECD guidelines.

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 & Requirement:** Blutsgeschwister discloses 84% 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 & Requirement:** Blutsgeschwister discloses 84% 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: 62**

### 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.	Basic	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.	2	6	0

**Comment:** The member has 24 active suppliers. 59% of the production volume comes from suppliers where the member has at least 10% leverage. 3% of the production volume comes from suppliers, where Blutgeschwister buys less than 2% of its total FOB.

The brand has two sourcing strategies for high and low-risk countries. The member focuses on (new) suppliers already committed to human and labour rights. At the same time, the sourcing strategy documents do not clearly state the decisional criteria (e.g., sourcing from a country where Freedom of Association is allowed). Blutgeschwister's sourcing strategy is to consolidate its supply chain; nonetheless, in the last financial year (2022), the brand added ten new subcontractors.

**Recommendation:** Fair Wear recommends Blutsgeschwister to consolidate its supplier base where possible and increase leverage at main production locations to effectively request improvements in working conditions. At the same time, Fair Wear recommends the brand to consolidate its supply base by limiting the number of production locations in its tail end. The brand shall privilege countries where Freedom of Association is allowed.

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:** Blutsgeschwister has a sourcing strategy that focuses on maintaining long-term relationships. In particular, the brand occasionally commits to long-range contracts.

53% of the member's total FOB volume comes from suppliers with whom Blutsgeschwister has a business relationship for at least five years. In the past financial year (2022), the company has started sourcing from 10 new subcontractors.

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:** Blutgeschwister developed a risk analysis matrix in line with the OECD requirements. The matrix includes all ten sector risks and plots them for each country against the scale, scope, irremediability and mitigation already in place. In addition, Blutgeschwister has scoped the business and sourcing models risks and some product and environmental-specific risks (the brand has yet to complete these two as it mainly focused on human rights indicators). Blutgeschwister uses this analysis to define what risks in its supply chain shall be prioritised, using a traffic light system to indicate low, medium and high risks. As this analysis was done in 2022 for the first time, it has yet to influence its sourcing strategy. The risk scoping includes a gender lens. The member particularly looks at the prevalence of gender-based violence in its sourcing countries.

**Recommendation:** Blutgeschwister is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

Fair Wear strongly recommends the brand to source from 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 Blutsgeschwister to inform new suppliers about Fair Wear membership by sharing information via email and meetings (e.g., Code of Conduct, company's core values etc.). The brand generally tries to visit all (new) suppliers before finalising the first purchase order. The CSR manager generally visits (new) suppliers if they are based in high-risk countries and discusses sustainability topics with factory management; in low-risk countries, the CSR manager does not always visit the (new) suppliers, but other colleagues (e.g., from the sourcing and product departments) are asked to discuss sustainability topics with management. If the new suppliers are subcontractors, the intermediary or the main factories must inform them about Blutsgeschwister's core values and sustainability goals. This process has been followed for almost all new suppliers added last year. The brand chooses only suppliers that have already started improving human rights, as this process is considered more efficient for long-term and sustainable change.

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:** Blutsgeschwister collects human rights information of potential new suppliers based on their self-assessment, collects existing audit reports, and conducts online meetings and/or in-person visits. If the suppliers have no interest or willingness to work towards sustainability and to protect human rights, the business relationship does not even start. The company 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. Based on the new brand's sourcing strategy, no new suppliers will be onboarded unless they have already interest and proven experience in working sustainably.

**Recommendation:** Fair Wear encourages the member to collect worker and stakeholder input before placing the first order. Fair Wear recommends Blutsgeschwister to investigate whether an operational grievance mechanism exists. Fair Wear strongly recommends the brand 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.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear’s CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

**Comment:** Blutsgeschwister has added ten new suppliers (subcontractors) in the past financial year. This high number is based on the main suppliers' decision to work with other subcontractors due to different production needs. Onboarding sessions were not organised for these new suppliers.

**Recommendation:** Blutsgeschwister is recommended to organise onboarding sessions specifically focusing on the Code of Labour Practices and the complaints mechanism within the first year of doing business. Blutsgeschwister is recommended to ensure that women workers and workers from other marginalised groups can participate in discussions in the onboarding sessions. Fair Wear recommends Blutsgeschwister 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 monitor human rights risks in its supply chain.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

**Comment:** Blutsgeschwister has a systematic approach to identifying human rights risks in its supply chain. The brand has determined the various monitoring tools based on the results of its risk assessment (see indicator 2.3). In the high-risk ones, the member relies on Fair Wear audits, visits from headquarters colleagues and quality control personnel based in the countries. In low-risk countries, Blutsgeschwister mainly visits the production site, frequently contacts factory management, and collects or conducts third-party audits. Monitoring tools do not explicitly include worker, stakeholder and/or supplier input (unless it is a Fair Wear audit). The member prioritises its monitoring efforts for production locations with higher risks or open findings.

**Recommendation:** Blutsgeschwister could integrate worker, supplier, and stakeholder input in its monitoring tools.

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).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

**Comment:** Blutgeschwister has mapped the risks to Freedom of Association in all its sourcing countries and can explain the main risks per country (except for risks to women workers).

China.

The brand is aware that China has extensive Freedom of Association rights on paper, as workers cannot freely form or join a trade union of their choice. Even when possible, these trade unions depend on the stated-based trade union. In particular, one Chinese supplier shared with the brand evidence of trade union presence at the factory. With the assistance provided by Fair Wear, Blutgeschwister discovered that it was only a formality and engaged in further discussions on this topic with the factory management.

India.

Blutgeschwister knows that Freedom of Association is only partially allowed in India. Nonetheless, one of the brand's suppliers has functional workers' committees in place (this was checked during visits). This factory also has one collective bargaining agreement in place.

Other sourcing countries (Portugal and Lithuania).

The brand has not found any risk related to Freedom of Association.

**Recommendation:** The member is recommended to ensure supplier-level monitoring is in place to assess and understand the risk at suppliers - for example, through the Supplier Questionnaire (tool 2 in Fair Wear's Freedom of Association Guide), modular assessment on Social Dialogue, in-depth discussions with suppliers, or a full audit.

Blutgeschwister should include risks specific to women workers in its risk assessment regarding Freedom of Association at its suppliers.

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.	Intermediate	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	4	6	0

**Comment:** The member could show it understands the gender risks for its sourcing countries. The brand identified gender-based violence as an important risk prevalent in India and discriminatory hiring practices in China and India.

Blutsgeschwister has started to collect gender-disaggregated wage data at some of its main factories to assess if there is gender-based wage discrimination. The brand has also analysed these data and the main conclusions (so far) are the following: some job categories are male or female-dominated. The male-dominated ones are generally paid better and workers who perform these jobs have a higher social status. The brand has also discussed these results with factory managers to assess the root causes. Based on the discussions, the factory managers agreed to hire more female workers for some job profiles. The brand has yet to verify if this was the case.

The member has not specifically looked into how its business practices affect gender at its suppliers.

**Recommendation:** Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices. Fair Wear recommends the member to collect additional gender data at the factory level.

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:** Blutgeschwister has a strong and systematic evaluation system for assessing suppliers' human rights performance. In particular, suppliers' performance is evaluated systematically after each season. CSR compliance is evaluated together with other indicators. All the departments at Blutgeschwister, including top management, meet to discuss the results that are also shared with suppliers. Blutgeschwister has yet to develop a follow-up plan with suppliers based on the CSR scoring. Occasionally, the outcome of this evaluation influences purchasing decisions.

**Recommendation:** Fair Wear recommends Blutgeschwister 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.	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:** Blutgeschwister uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting (if any). There is no evidence of missing first-tier locations in the database. The member takes measures to prevent unauthorised subcontracting or unknown locations, such as contract clauses, visits during production, and a forecast system that help suppliers plan their capacity needs. Blutgeschwister has also taken steps to get transparency deeper in its supply chain. In particular, the brand collects information beyond tier one of its supply chain by collecting information on the cotton mills, embroidery and trim locations with supplier's support.

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:** Blutgeschwister explicitly asked its suppliers if they use homeworkers and they informed the brand that there is no use of it. When the brand visits the production locations, the CRS manager or other visiting colleagues check if the production settings are typical for home-working (e.g., garages where only a few people work). None of the factories indicated the use of homeworkers.

**Recommendation:** Blutgeschwister is recommended to check which products and supporting processes cause a higher risk of homeworkers as this is a very hidden phenomenon.

## 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:** Blutgeschwister signs a framework agreement with its manufacturers, which forms the basis of all orders. Together with it, a 'supplier manual' is shared. In both documents, the brand explicitly refers to the Code of Labour Practices and the brand's core values in terms of sustainability.

The framework and the supplier manual partly support the implementation of human rights due diligence by setting open costing as the standard procedure to determine the price. It is clearly stated that labour costs and supplier's margin cannot be negotiated. At least 30% of each order is paid in advance, and the rest follows once the merchandise has been delivered to Blutgeschwister.

**Recommendation:** Fair Wear strongly recommends that Blutgeschwister remove penalties for late delivery from its contracts, or at least ensure there is 'proof of fault by the supplier'.

Blutgeschwister 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:** There is an active and constant interchange of information between CSR and other departments to enable coherent and responsible business practices.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Advanced	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	6	6	0

**Comment:** Blutsgeschwister has a solid and lengthy production planning system. The product development period is approximately 18 months, including many repeated orders, styles, and fabrics. Lead times are at least three months (sometimes up to five months). The product development team involves suppliers in planning and setting together delivery dates (the exchange between the brand and the suppliers/agents takes place for two weeks before any final decision is made). The brand does not change the style or the quantities after the final order is placed to support reasonable working hours.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	6	6	0

**Comment:** Blutsgeschwister has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. In addition, the brand knows the labour minute value at most of its suppliers. In 2022, Blutsgeschwister continued to roll out open costing at most of its suppliers. One supplier who was not willing to do open costing has recently started to share some labour costs information with the agreement that the brand would continue to place orders.

The company now has insight into the labour costs of all of its products. Blutsgeschwister has complete insight into the labour minute values at these factories and directly relates them to their prices. Blutsgeschwister keeps a structured overview of all this, including the FOB price increases needed in the coming years to contribute to a gradual wage increase at these suppliers. Blutsgeschwister has a team for responsible pricing, and they work on open costing. The target wage is fixed in the open costing sheet. The CSR responsible prepares the template for open costing and the fixed target wages before each pricing period. The CSR person and the purchasing team meet before each new season before costing starts and whenever there are adjustments to be made. Additionally, it is a business rule that new suppliers need to be open to open-costing as a requirement to start production at the site.

**Recommendation:** Blutsgeschwister 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 Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Intermediate	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.	2	4	0

**Comment:** Blutsgeschwister has informed its sourcing intermediaries of Fair Wear requirements. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

**Recommendation:** Blutsgeschwister could require its intermediaries to uphold the purchasing practices mentioned in the CFRPP framework.

## Layer 3 Remediation and impact

**Possible Points: 96**

**Earned Points: 56**

### Indicators on Quality and coherence of 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.	Basic	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.	2	6	0

**Comment:** Based on the identification of the risks at the supplier level, Blutsgeschwister has linked factory risks to appropriate follow-up for some of its suppliers.

**Recommendation:** Fair Wear recommends the member to further complete its follow-up plans. These shall be written.

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

**Comment:** Blutgeschwister has partly included a gender lens in its improvement and prevention programmes. The brand has conducted Workplace Education Programmes to prevent gender-based violence and has discussed gender-disaggregated wage data with some of its suppliers to encourage them to hire more women for higher-paid job positions.

**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.	Basic	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.	2	6	0

**Comment:** Blutgeschwister included some steps to encourage Freedom of Association and effective Social Dialogue in its improvement or prevention actions. At one of its Indian suppliers, the brand checked if the worker's committees, including the anti-violence and harassment one, were existing and well functioning. The CSR manager has also met some of the committee's representatives to discuss their roles and confidence. The member has yet to include steps to encourage Freedom of Association at its suppliers in China.

**Recommendation:** Fair Wear recommends Blutsgeschwister to be more comprehensive and include more steps to promote Freedom of Association and effective social dialogue in its improvement and prevention actions.

Blutsgeschwister is recommended to, together with the supplier, distribute non-retaliation letters to workers, ensuring workers know they will not be punished for joining or forming trade unions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Intermediate	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.	4	6	0

**Comment:** Blutsgeschwister actively supports and monitors the effectiveness of internal grievance mechanisms by checking with suppliers if any system is in place. In China, there is no formally established internal grievance mechanism. Workers use 'WeChat' App to present requests and complaints to factory management. Yet, the system is not anonymous. In India, the brand asks the suppliers to share information on the existence of internal committees and assess if they are capacitated during factory visits.

Blutsgeschwister has yet to assess its suppliers' internal grievance mechanisms at the start of a business relationship and, therefore, may respond with an ad-hoc approach if the internal grievance mechanism is ineffective.

**Recommendation:** Fair Wear recommends Blutsgeschwister to ensure that the evaluation of internal grievance mechanisms of its suppliers is systematically considered in purchasing decisions and in the supplier evaluation system.

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.	Basic	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.	2	6	0

**Comment:** Blutsgeschwister cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Blutsgeschwister has yet to cooperate with customers that are not Fair Wear members.

**Recommendation:** Even though Blutsgeschwister already works together with other Fair Wear members, Fair Wear recommends to also collaborate with other customers.

## Indicators on 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.	40%	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.	4	6	-2

**Comment:** In the past financial year, Blutsgeschwister has received four audit reports. During the performance check, the member could demonstrate with a sample that more than half of the CAP issues requiring improvement actions have been followed up. The brand followed up on almost all occupational health and safety and missing wages components findings. The CAP issues that require improvement actions and are still open are issues that are more complex or structural and therefore need more time to be remediated.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Basic 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:** Blutsgeschwister has identified some root causes of human rights risks and discussed these with its suppliers. The member has started to develop some preventive steps addressing these root causes. In particular, Blutsgeschwister has engaged in dialogue with its Indian suppliers to organise additional training to prevent gender-based violence and harassment.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

**Comment:** The member has a system to ensure possible human rights risks are regularly discussed with these suppliers. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

**Recommendation:** Blutsgeschwister 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.	Advanced	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.	6	6	0

**Comment:** Although Blutgeschwister's planning system supports reasonable working hours, excessive overtime still occurs at some of its suppliers. In the previous year, all four audit reports mentioned excessive overtime at the Chinese factories. Only in some cases partial improvement was shown. Blutgeschwister analysed the root causes of these findings. According to the member, bad production planning on the supplier's side and double booking are significant causes for excessive overtime. The member has addressed this and promotes transparency about working hours by enhancing its production planning system (see indicator 2.15). Blutgeschwister could show that its efforts resulted in reduced excessive overtime at its Indian suppliers.

**Recommendation:** Fair Wear advises Blutsgeschwister to discuss with its Chinese supplier which solutions included in the Fair Working Hours Guide are applicable.

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, three out four of audits conducted at Chinese factories included findings regarding non-payment of legally required wage elements. In particular, workers were not always paid overtime premium and statutory leave. In other cases, the factory did not record in a reliable manner the attendance record of workers; as such, auditors were not able to assess their wage situation. Blutsgeschwister responded to most of these findings by asking for information from the suppliers. Some of these findings (also from audits conducted in the previous financial years) have been solved. Nonetheless, Blutsgeschwister could show that all due wages were compensated only for some of these findings.

**Recommendation:** Fair Wear strongly recommends Blutsgeschwister to ensure problems of payments below legal minimum wages are not just prevented going forward but also remediated retroactively.

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:** Blutsgeschwister has created an overview of the wage levels at its suppliers and the gap towards the estimated living wage. The brand discusses the topic of wages with almost its suppliers by adopting an open-costing approach. Blutsgeschwister has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Based on the root-cause analysis, the brand has developed a time-bound plan to enable the systemic increase of wages at all its suppliers.

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:** Blutsgeschwister has a clear understanding of wage levels at almost all its suppliers. An analysis has been made by comparing wage levels per factory with the Global Living Wage Coalition Benchmark (if not existent, trade union's benchmarks were used) and legal minimum wage. Target wages were set for suppliers covering 48% of the brand's total FOB. Based on this analysis, Blutsgeschwister has developed a strategy to finance wage increases at its suppliers and set a target wage at three selected suppliers. With top management's approval, the brand has also set a time-bound plan to enable the systemic increase of wages at some suppliers based on the Global Living Wage Coalition benchmark and, if this is not available, refers to benchmarks set by trade unions.

In low-risk countries, the wages are well above the legal minimum wage and therefore are less priority.

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

In case Fair Wear members are interested in developing a joint approach to improving wages at a shared supplier, Fair Wear can give advice on measures that need to be taken by Blutsgeschwister to ensure compliance with anti-trust/anti-competition legislation in relevant jurisdictions.

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.	48%	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.	4	6	0

**Comment:** Blutsgeschwister uses fact-based costing to ensure its prices support the payment of a living wage estimate at suppliers responsible for almost 48% of Blutsgeschwister FOB.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear’s helpline in accordance with the Fair Wear Complaints Procedure.	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:** Blutsgeschwister received one complaint in the past financial year about discrimination at one of its Indian suppliers. The member did adequately respond to these complaints as per Fair Wear’s Complaints Procedure by asking for clarifications and further information from the factory management and collaborating to find possible solutions. At the same time, Blutsgeschwister collaborated with another Fair Wear member who supplies from the same factory. The complaint is now closed as the worker did accept the proposal made by the factory management.

Blutsgeschwister took steps to prevent similar complaints from occurring at the Indian suppliers by enrolling them in the Workplace Education Programme to prevent gender-based violence. Blutsgeschwister included the outcome of these complaints in deciding on follow-up in its human rights improvement and prevention plans by discussing with its Indian supplier to replicate the training to cover more workforce at shared expenses.

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.	Basic	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.	2	6	0

**Comment:** The member has enrolled some of its suppliers with findings on discrimination in the following training modules: Workplace Education Programme to prevent gender-based violence. The Workplace Education Programme Basic has been conducted in the past financial years at the brand's Chinese suppliers.

**Recommendation:** Blutsgeschwister is recommended to implement training for all factories where this is part of their improvement and/or prevention programme.

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:** Blutsgeschwister followed up on the implemented training by discussing the results with the factory management. Additionally, the member used the training results as input for human rights risk monitoring by discussing with its Indian supplier how to replicate the training to cover more workforce at shared expenses.

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.	Insufficient	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	0	4	0

**Comment:** Blutsgeschwister developed a responsible exit strategy based on Fair Wear's model. Last year, the brand left six subcontractors (mainly doing supporting processes). The brand had no direct contact with them and did not ask the main suppliers/intermediaries to follow up.

**Requirement:** Fair Wear recommends Blutsgeschwister not only to have a responsible exit strategy but also to enforce it.

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:** Blutsgeschwister 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: 18**

**Earned Points: 14**

### Indicators on Communication, transparency and evaluation

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.	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:** Blutsgeschwister communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. For example, Blutsgeschwister actively spreads the Fair Wear message via social media (Instagram and Facebook) and newsletter to customers. The brand has also developed retailers' communication guidelines to use Fair Wear's logo.

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:** Blutsgeschwister does not sell external brands.

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:** Blutsgeschwister has submitted its social report, which Fair Wear approved. Blutsgeschwister 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:** Blutsgeschwister published its social report, which includes some factory-level data and remediation results, on its website. The brand has yet to disclose its full factory list and its time-bound improvement plans.

**Recommendation:** Fair Wear recommends Blutsgeschwister to publish time-bound plans for its suppliers and to publish a complete factory list.

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:** Blutgeschwister relies on CAPs and factory visits to track the implementation of measures in prevention and improvement programmes. The member does not systematically include feedback from workers and suppliers in its evaluation system. As The CSR manager checks progress with other departments in direct contact with suppliers and shares information on progress with other Fair Wear members. The internal evaluation system involves top management.

**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.	No requirements were included in the previous Brand Performance Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

**Comment:** In the previous brand performance check, no requirements were included.

## 5 Appreciation chapter

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

**Comments:** Blutgeschwister publicly engages in proactive and transparent communication and solidarity initiatives. The brand joined the Fair Friday Campaign, donated garments to Ukraine refugees for every jacket sold and did a charity sale to save the bees. During Fashion Revolution Day, some workers from Lithuania were asked to join the campaign 'I made my clothes'.

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.: Yes

**Comments:** One of Blutgeschwister's CEOs participated to the Fashion Sustain Frankfurt City Edition. In her quality, she joined the panel and talked about sustainability efforts from a business owner's point of view.

## Recommendations to Fair Wear

Blutgeschwister recommends Fair Wear to clean the Fair Wear supplier's database and merge duplicated suppliers.

Blutgeschwister highly values Fair Wear partnership to work sustainably. At the same time, Blutgeschister recommends Fair Wear to provide guidance at a better timing.

# Brand Performance Check details

Date of Brand Performance Check: **08-05-2023**

Conducted by: **Gemma Giammattei**

Interviews with: **Stephan Kuenz and Karin Ziegler - CEOs**

**Katharina Fest - CSR manager**

**Sandra Walker - Purchasing and sourcing department**

**Sara Lemmens - Communications team**