

# Brand Performance Check Ortovox Sportartikel GmbH Publication date: January 2024

This report covers the evaluation period 01-07-2022 to 30-06-2023

#### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.



#### **Scoring overview**

Total score: 148
Possible score: 202

Benchmarking Score: 73

Performance Benchmarking Category: Leader



#### **Summary:**

Ortovox has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 73, the member is placed in the Leader category.

The member brand's efforts are notable in several areas, particularly in sourcing strategy and communication transparency, where they score high. However, the report also identifies areas for improvement, such as deepening long-term supplier relationships, incorporating a gender lens more effectively, and enhancing workers' rights awareness. Ortovox has effectively conducted risk scoping and assessment. The brand has also demonstrated advancement in its improvement and prevention plans. Furthermore, Ortovox has taken tangible steps towards ensuring the payment of a living wage at its manufacturing sites, although there remains progress to be made.

Fair Wear recommends Ortovox to strengthen its practices further. These include committing to long-term contracts with suppliers, including input from workers, suppliers, and stakeholders in risk-scoping exercises, and explicitly prioritizing countries where workers can freely form or join trade unions. Additionally, Ortovox is encouraged to integrate responsible business practices into job role descriptions for sourcing and purchasing staff, thereby embedding CSR more deeply into their operational fabric.

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 Ortovox Sportartikel GmbH**

#### **Member company information**

Member since: 1 Jan 2015

Product types: Outdoor products, Sports & activewear and Outdoorwear

Percentage of CMT production versus support processes 100%

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

Percentage of FOB purchased directly 83%

Percentage of FOB purchased through agents or intermediaries 11%

Percentage of turnover of external brands resold o%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's/Organisations Partnership for Sustainable Textiles,

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
Viet Nam	11	45.81%
Ukraine	3	9.52%
Latvia	5	9.33%
Romania	5	8.63%
Serbia	2	7.21%
China	8	4.81%
Germany	4	3.42%
Lithuania	7	2.89%
Belarus	2	2.87%
Italy	1	2.76%
Poland	1	2.11%
Hungary	1	0.45%
Austria	1	0.13%
Taiwan	1	0.06%

#### **Layer 1 Foundational system's criteria**

Possible Points: 8
Earned Points: 8

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

**Comment:** Ortovox has a solid Responsible Business Conduct Policy in place.

- 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.:
- 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.:
- 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:** Ortovox discloses 98% of production locations internally through Fair Wear's information management system. Ortovox had the ambition to disclose 100% of its supply chain and was awaiting signed confirmation for the last 2%, which the member received after the close of the financial year 2022/2023.



1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

**Comment:** Ortovox discloses 98% of production locations externally on Fair Wear's transparency portal. Ortovox had the ambition to disclose 100% of its supply chain and was awaiting signed confirmation for the last 2%, which the member received after the close of the financial year 2022/2023.

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: 66** 

#### **Indicators on Sourcing strategy**

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

Comment: Ortovox has a sourcing strategy addressing influencing labour conditions. The member has 49 active suppliers. 60% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 17% of the production volume comes from suppliers where Ortovox buys less than 2% of its total FOB. This is an improvement compared to the previous year. The member decreased tail-end suppliers by 2%. Ortovox's sourcing strategy explicitly focused on increasing influence through consolidation and active cooperation with other clients. However, the brand emphasised that further reducing the tail end would lead to decreased production in Europe, a scenario they aim to avoid to sustain their current level of European production.

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:** Ortovox has a sourcing strategy that focuses on maintaining long-term relationships. 63% of the member's total FOB volume comes from suppliers with whom Ortovox has a business relationship for at least five years. The member does not commit to long-term contracts yet.

**Recommendation:** Fair Wear recommends Ortovox to commit to long-term contracts. Ortovox is advised to embed long-term contracts in its sourcing strategy.

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:** Ortovox conducts risk scoping and includes all risk factors on the business model, sector and product level. The brand has developed a risk matrix in line with OECD requirements. The member brand uses this matrix to prioritise risks in its supply chain, using a traffic light system to indicate low, medium, and high risks. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly.

Ortovox could show that it knows the highest risks of each of its production countries. For risk scoping of countries where Fair Wear is inactive, it consulted different resources such as Amfori's Countries' Risk Classification, MVO risk checker and external audits. Ortovox identified freedom of association and forced labour as a risk for Ukraine. Ortovox's risk scoping includes a gender lens. The member examines each Code of Labour Practice and how it specifically impacts women. Nonetheless, the member has yet to include input from workers, suppliers and stakeholders.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding the production of goods in Belarus. Ortovox has responsibly exited the supplier by October 2022. However, Ortovox's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and bargain collectively. Why not.

**Recommendation:** The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise. Fair Wear strongly recommends Ortovox to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: The standard process for Ortovox to inform new suppliers about Fair Wear membership begins with sending an introductory email that outlines the Fair Wear guidelines. After this initial contact, suppliers are required to complete a questionnaire to evaluate their current CSR practices. Ortovox also requests that suppliers provide a photo of the Code of Labor Practices (CoLP) displayed within their facility, ensuring that labour standards are visibly acknowledged. A CSR presentation is subsequently shared with the suppliers to communicate the brand's expectations clearly. Training on Fair Wear principles is provided to equip suppliers with the necessary knowledge to comply with these standards. The onboarding sequence is concluded with the suppliers' signing of the Chemical Compliance Guideline, Code of Conduct, and the General Producer Agreement, which includes the CoLP. This process has been followed for all suppliers added last year, ensuring a consistent approach to CSR integration. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Ortovox can cooperate on this topic.

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:** Ortovox collects human rights information of potential new suppliers by collecting self-assessments that include questions about wage levels, existing grievance mechanisms, worker representation, gender composition of the workforce, and the presence of minorities. The member collects existing audit reports (or organises Fair Wear audits), and visits the production site to inspect the facility and gather information about the situation on-site. The brand will also require input from worker representation depending on the available information. The collected information leads to sourcing decisions.

**Recommendation:** Fair Wear strongly recommends Ortovox to privilege suppliers where workers can freely form or join a trade union and bargain collectively and make this explicit in its sourcing strategy.

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

**Comment:** In the previous financial year, Ortovox has added seven new suppliers. The member shared information about Fair Wear's Code of Labour Practices (CoLP) and the complaints helpline within the first year of business. The Worker Information Sheet (WIS) has been posted. Ortovox organised onboarding sessions for workers and the management of new suppliers. The member organised these sessions to raise awareness about the Fair Wear CoLP and the complaints helpline. The member has yet to include the worker representation and a gender and minority lens in these sessions.

**Recommendation:** Fair Wear recommends Ortovox 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. Ortovox is recommended to ensure that women workers and workers from other marginalised groups can participate in discussions in the 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:** Ortovox has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for each production location. It has identified the appropriate monitoring tool and frequency per country (or outcome of the risk scoping). For instance, the brand monitors its suppliers in the countries that its risk scoping identified as having a higher risk of limited freedom of association and forced labour by enrolling them in audits, organising monitoring visits, regular dialogue with factory management and training. The member brand has found its monitoring tools to be trustworthy.

Ortovox's monitoring tools do not structurally include worker, stakeholder and/or supplier input. Ortovox only commissions Fair Wear audits in countries where Fair Wear is active for its monitoring. Next to its systematic approach, the brand ensures it uses different monitoring tools that include input from workers, suppliers, and other stakeholders. These tools are: monitoring visits, self-assessments, HIGG FSLM information and third-party audits.

**Recommendation:** Ortovox could integrate worker, supplier, and stakeholder input more structurally 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: Ortovox has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. Ortovox assesses the presence of Freedom of Association (FoA) and Collective Bargaining (CB) rights by carrying out worker interviews during audits, training, self-assessments and onboarding sessions. The brand relies on the factory's complaint mechanisms should workers encounter any grievances. Ortovox uses this information to understand the risks at its supplier sites and inform its engagement strategy with suppliers on this matter. The brand has in place supplier-level monitoring to evaluate and comprehend the risk at supplier sites. In 2022, Ortovox requested all suppliers to complete a survey that included questions on FoA, unionisation, worker representation, and Collective Bargaining Agreements (CBAs), enhancing the brand's ability to assess risks and engage with suppliers effectively. The member brand has yet to include gender-disaggregated data on FoA.

**Recommendation:** Ortovox should include risks specific to women workers in its risk assessment regarding FoA 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.	Basic	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.	2	6	0

Comment: Ortovox has included gender in its risk scoping. The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified freedom of association as important risks prevalent to women in China and Viet Nam. Additionally, Ortovox actively collects gender data per factory. Data that it collects are workforce composition, leadership and wage information. This information is collected through surveys and audits. While the member has yet to analyse the collected gender-disaggregated data at the factory and country levels, the information was fed into the risk assessment.

**Recommendation:** Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices. Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

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

Comment: Suppliers' human rights performance is evaluated systematically every year. Biannually, Ortovox assesses and monitors its suppliers' adherence to the Code of Labour Practices. This is executed through a supplier evaluation sheet, incorporating a traffic light grading system to categorise compliance levels easily. Suppliers receiving low scores are particularly focused on identifying, and implementing improvement strategies. The evaluation ranks each supplier on a scale from one, indicating unacceptable practices, to ten, representing best practices, across various labour standards. This evaluation is grounded in the findings of the risk assessment. The brand systematically integrates the outcome of this evaluation into its purchasing decisions. However, this evaluation is influenced by CSR performance but is not restricted to it. The provided examples did not feature instances of poor CSR performance.

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: Ortovox uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations in the database. Annually, Ortovox requires suppliers to complete detailed data sheets, including queries regarding their subcontractors. In its supplier contracts, Ortovox has incorporated a clause that mandates transparency and disclosure about subcontracting practices. According to this clause, any subcontracting must get prior approval from Ortovox. The company applies the same standards to both direct suppliers and subcontractors, including initiating comprehensive audits for subcontractors. Additionally, the member actively prevents unauthorised subcontracting by visiting suppliers during production.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	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.	2	4	0

Comment: Ortovox maintains that the likelihood of their suppliers employing homeworkers is exceedingly low, given the nature of their products, primarily created using machine embroidery, a method not typically associated with home-based work. This factor has been integrated into Ortovox's risk assessment and ongoing monitoring processes. Audit results have not uncovered evidence of homeworkers in Ortovox's supply chain. The member brand oversees its suppliers' production capacities through frequent inspections to avert any unauthorised subcontracting or employment of homeworkers. Consequently, Ortovox believes that homeworkers are not utilised for its orders.

#### **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	O

Comment: Ortovox engages in contractual agreements with its suppliers, highlighting the Code of Labour Practices (CoLP) in these contracts. Alongside this, purchase orders set out general terms and conditions, covering aspects such as pricing. The contracts clearly delineate mutual responsibilities related to the implementation of the CoLP, including fair payment terms. Most suppliers have agreed on 30 days net and in several cases, material or packaging costs are paid forward. These terms are adapted to fit the nature of the businesses Ortovox collaborates with, whether they are small, large, or family-owned, and are agreed upon in a way that suits the supplier. For delivery delays, damages and quality issues, the brand first investigates for proof of fault. Despite Ortovox's efforts to make shared responsibility clear in its agreements, there remains a disparity in the language used to describe the obligations of suppliers compared to those of Ortovox.

**Recommendation:** Ortovox 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.	Advanced	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	6	6	0

**Comment:** Ortovox actively 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. Sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies. Examples of these KPIs are maintaining and consolidating of supplier portfolio and increasing flexibility potential. The member also has responsible business practices embedded in its overall function strategies for the different departments but has yet to make it more explicit for each individual role description.

**Recommendation:** Ortovox could include explicitly 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: Ortovox manages its development and production processes, starting with the development department's timelines and comprehensive collection overviews each season. This approach includes a multi-stage forecasting system, beginning around 1.5 years before delivery, to ensure smooth production flows and reasonable working hours. The planning and production team facilitates communication across the supply chain, from raw material to final product. Suppliers receive detailed forecasts and production plans well in advance, allowing for efficient capacity planning and preventing unauthorised subcontracting or the use of homeworkers. Suppliers' input is constantly considered during this process. Ortovox also monitors material supply closely, coordinating with all tiers in the supply chain to ensure timely delivery and prevent delays. This comprehensive strategy ensures efficiency and ethical practices in production and aligns with Ortovox's commitment to responsible and sustainable manufacturing.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	4	6	0

Comment: Ortovox has a basic understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Ortovox engages in a detailed pricing process with its suppliers for each product, addressing the prices twice a year for the winter and summer seasons. This includes discussions on style prices every six months, especially for items featured in both seasons. The product development team sets target prices based on initial samples, suggested retail prices, and the costs of similar products. Additionally, in some instances, Ortovox receives a comprehensive cost calculation from suppliers using an 'open costing sheet'. This sheet, which is used for about 30% of the total production volume's FOB value and mainly by European suppliers, helps link the purchasing prices to wage levels at the production sites. It includes detailed information like standard minute-per-style and labour minute costs. Following mutual agreements with the manufacturing partners, labour costs and any increases therein are incorporated into the costing. Meanwhile, from Asian suppliers, Ortovox typically receives final FOB prices. Ortovox does not negotiate the production costs that are set by the supplier. However, while the brand gathers a lot of data on pricing, Ortovox finds it difficult to relate the data to wage levels at its suppliers. The brand also noted that suppliers find working on the Fair Price app labour-intensive.

**Recommendation:** Ortovox is recommended to investigate why some suppliers are reluctant to work with Fair Price or any other form of fact-based costing, if needed, with the support of Fair Wear's local teams.

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:** Ortovox has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. While intermediaries are involved in the procurement of the goods, the brand has direct contact with the facilities.

#### **Layer 3 Prevention, mitigation and remediation**

**Possible Points: 90** 

**Earned Points: 66** 

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Intermediate	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	4	6	0

**Comment:** Ortovox has made risk profiles per supplier and has started following the follow-up plans in the member hub during this financial year. Ortovox, while yet to finalise its follow-up plans, utilises Corrective Action Plans (CAPs) and an annual work plan to strategise follow-up actions based on identified risks. During its performance check, a random selection of production locations was examined. For each location, Ortovox prioritised actions that aligned with the most significant risks identified. This includes initiatives like training for awareness of rights and focused efforts on social dialogue, as noted in indicator 3.3.

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

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:** The member company has incorporated a focus on gender within its risk assessment framework and also in its programme for improvements and preventive measures. This year, the brand initiated the implementation of these gender-focused actions, marking the beginning of a more inclusive approach. However, it's important to note that this is just the start, and the brand acknowledges that more work must be done. Comprehensive follow-up on all findings related to these gender-focused initiatives is still pending, signalling a sustained dedication to improving gender-related topics within its business conduct.

**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.	Intermediate	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	4	6	0

Comment: Ortovox has taken practical measures to promote Freedom of Association (FoA) and effective Social Dialogue (SD) within its improvement and prevention framework. As part of its preventative strategy, the brand has integrated the principles of FoA and SD into the process of onboarding new suppliers. This approach includes gathering detailed information about worker representation and the existence of collective bargaining agreements. In instances where audits uncover issues related to these areas, Ortovox responds promptly with remedial actions. However, the brand acknowledges that there is room for further development in this domain. Specifically, Ortovox is yet to establish a formalised strategy dedicated to FoA, signifying an area for ongoing refinement in its operational practices. This indicates a commitment to continuous improvement and an understanding of the importance of structured approaches in fostering effective FoA and SD.

**Recommendation:** Ortovox is recommended to support in coordinating training on FoA and SD for its suppliers. Fair Wear recommends Ortovox to apply a gender lens and ensure its steps to promote FoA and effective SD address the specific risks for female workers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Advanced	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	6	6	0

Comment: At the beginning of any new business relationship, Ortovox evaluates the internal grievance mechanisms of its suppliers and continues to monitor them regularly. The company uses audits to verify the effectiveness of these internal grievance systems. During site visits, Ortovox personnel also review the complaint logs and inquire whether worker representatives are involved in addressing the complaints filed. This approach provides Ortovox with a clear understanding of which internal grievance mechanisms are functioning well and which require further enhancement. In locations where improvements are needed, Ortovox encourages management to facilitate the election of worker representatives or offers support in organising training for these representatives.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Advanced	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	6	6	0

**Comment:** Ortovox cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Next to that, the member also cooperates in taking more preventive measures, such as organising training. Ortovox also works with other brands that are not Fair Wear members, exchanges CAP updates with them, and works on living wage projects.

#### 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.	67%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

**Comment:** During the performance check, the member could demonstrate with samples that more than two-thirds of the CAP issues requiring improvement actions have been followed up. Issues that have been resolved range from grievance mechanisms, late payments and working hours to safety findings. In addressing CAP findings, Ortovox first collects documentation and factory feedback and then schedules a factory visit to follow up on individual findings.

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

Comment: Ortovox has identified most root causes of the CAP issues and discussed these with its suppliers. Ortovox has identified two main causes at the root of several CAP findings, especially those related to working hours and wages (see indicators 3.9 and 3.11). Ortovox also identified the lack of workers' awareness of their rights as a root cause of ineffective social dialogue and internal grievance mechanisms. Ortovox addressed this by creating a comprehensive plan for training based on leverage and risks assessed of which implementation started in 2022.

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.	Advanced	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.	6	6	0

**Comment:** Ortovox has eight suppliers in Poland, Austria, Hungary, Germany and Italy, where improvement or prevention steps are unnecessary. These cover 9% of the member's total FOB. Ortovox regularly communicates with them about labour rights and visits the locations to discuss wage levels and general working conditions with workers and worker representatives.

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: In the previous year, 11 audit reports of a total 25 audits in the past three years mentioned excessive overtime. Audits conducted later in the financial year have verified and validated improvements in excessive overtime. Ortovox recognises the risk of excessive overtime in its manufacturing locations in China and Vietnam. To address this, the company has implemented a production planning system designed to prevent such issues. Whenever audits reveal instances of overtime, Ortovox engages in discussions with suppliers to determine if its business practices might be contributing to the problem. However, suppliers have generally indicated that the causes of overtime are external to Ortovox's practices. It has been identified that late delivery of materials or prioritisation of other customers by suppliers are the primary reasons for excessive overtime. In response to these findings, Ortovox has adapted its purchasing practices. Communication about changes in production volume is now initiated earlier with suppliers. Additionally, the company has begun planning with longer lead times in its production process to alleviate time pressure. Specifically, to counteract late material deliveries, Ortovox has considered transporting products by air instead of by sea. The production team also maintains constant communication with the sales department to manage expectations regarding retail delivery dates. In exceptional cases, sea freight can also be changed to air freight. Furthermore, Ortovox has invested significantly in expanding its warehouse capacity and improving logistics efficiency. This strategy aims to create additional buffer times, further mitigating the risk of excessive overtime in its production chain.

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, seven audits included findings regarding non-payment of legal minimum wage and legally required wage elements. Findings ranged from failure to provide the correct wage data to incorrect overtime premiums and unpaid statutory leaves. Ortovox could show it followed up diligently in most cases. In some cases the brand found difficult to remediate because of the complexity of the cases. In one instance, after the factory closed due to COVID-19, many workers departed, making it challenging for the brand to contact them to deliver their severance pay. It is unclear how many of the workers have received severance payments. Twelve out of 459 workers did not return on the sixth day and it is unclear what happened with these workers. It is worth noting that none of the employees were laid off because of this incident. Nonetheless, the brand's negotiation efforts led to the payment of wages for the days missed by 447 workers who resumed work on the sixth day.

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.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	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.	4	6	0

**Comment:** Ortovox has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. In 2022 Ortovox started with the Fair Price app and has meanwhile enrolled in another programme organised by the Fair Labor Association. Based on the root-cause analysis, Ortovox has developed a time-bound plan to enable the systemic increase of wages at all its suppliers. Although the open costing information provided by suppliers doesn't offer comprehensive data on the wages paid, it does include Labour Minute Costs as a component of the FOB price. This aspect of the costing allows the development team to track which labour costs are factored into the price calculation. While not exhaustive in wage details, this process provides some visibility into the labour cost elements that contribute to the overall pricing of products. While Ortovox has thought of a strategy to achieve the payment of living wages by 2030, the member has yet to develop a practical approach to get wages increased.

**Recommendation:** Fair Wear encourages Ortovox to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Basic	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	2	6	0

Comment: Ortovox has started to address the topic of living wages internally by addressing the topic in meetings across different departments and involving top management. Ortovox has an overview of wages paid in production locations, and the member has also discussed wage increases with its factories. The brand is aware of the extra expenses involved and has integrated this understanding into a long-term plan extending to 2030. Although it has a solid grasp of the subject and a strategic approach to ensuring the payment of living wages at its supplier locations, the brand has also announced a price freeze until 2025. While the member has looked at different living wage benchmarks, the strategy has yet to include a concrete course of action for implementation. Additionally, the mentioned freeze does not accommodate adjustments for variables such as fluctuations in exchange rates or inflationary pressures.

**Recommendation:** Fair Wear recommends Ortovox to modify the price freeze set until 2025 by incorporating an adjustment for inflation.

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.	37%	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:** Ortovox sources from suppliers that contribute to living wages, which accounts for 37% of Ortovox's FOB value. This has been verified and validated by third-party audits.

**Recommendation:** Ortovox is encouraged to roll out its approach to other suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear 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:** Ortovox received one complaint in the past financial year, about the payment of severance payment following a resignation at its supplier in Viet Nam. The member adequately responded to these complaints as per Fair Wear's Complaints Procedure. The member brand entered dialogue and required the factory to pay the outstanding balance.

**Recommendation:** Ortovox 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.	Intermediate	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or genderbased violence, where factorylevel transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	4	6	0

**Comment:** Ortovox uses its supplier risk assessment to decide which suppliers need to be enrolled in training. In the past three years, it has enrolled three suppliers into Fair Wear's WEP Basic or communication module. Not all suppliers where CAPs show a need for training, for instance because of low awareness about labour rights, have been enrolled in training yet.

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:** Ortovox organised WEP Basic training, which do not require specific follow-up and for the more advanced training the company has not received training reports yet and awaits those to decide on appropriate follow-up.

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: Ortovox's human rights risk monitoring does not includes a responsible exit strategy. In the past financial year, the member stopped with 11 suppliers. The member followed the steps in the responsible exit strategy. Ortovox has a structured process for evaluating and interacting with suppliers, which includes regular meetings for producer evaluation and distribution. These meetings involve input from all relevant departments and lead to discussions about any issues or difficulties the supplier may be experiencing. If there's a need to reduce capacity or end the business relationship, an exit plan is jointly discussed, and suppliers are informed at least two seasons before the last purchase order to ensure they have ample notice. Risk assessments are conducted for both Ortovox and the supplier to understand potential areas for improvement. Decisions about ending a supplier relationship are made in accordance with the supplier strategy, with the stipulation that no current production cycles are halted abruptly. Typically, Ortovox and its suppliers may agree to continue the production program without placing orders for new styles, resulting in a gradual phase-out of production rather than an abrupt stop. This approach aims to manage the supplier relationship responsibly and minimise disruption.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Basic	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	2	6	0

**Comment:** Ortovox undertakes activities beyond Fair Wear scope, by ensuring all tier 2 locations sign the Code of Labour Practices and go through the Ortovox onboarding process. The member brand also collects third-party audits and a self-assessment and uses information on country level for its risk scoping.

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

**Possible Points: 22** 

**Earned Points: 16** 

#### Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership 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	O

**Comment:** Communication about Fair Wear membership and the leader status adheres to the Fair Wear communication policy. Fair Wear membership is communicated through the company's website, on catalogs, on social media, youtube and through company presentations. Ortovox is actively involved in the German Partnership for Sustainable Textiles (PST) and other stakeholder platforms where it regularly informs the public and its stakeholders about Fair Wear membership.

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

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

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	O

**Comment:** Ortovox has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. The member has yet to implement a triangulated approach including other stakeholders like worker representation 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.	Intermediate	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: The previous performance check included three requirements. Firstly, the brand was required not to terminate any business relationship without engaging in thorough discussions with suppliers to explore all possible scenarios and solutions. In situations where exiting a relationship is inevitable, Ortovox must prioritise the protection and payment of workers, aligning with Fair Wear's guidelines for a responsible exit. Secondly, the company needed to conduct a detailed analysis to identify what is necessary to increase wages and devise a strategic plan to finance these wage hikes. Lastly, Ortovox is expected to establish target wages for employees at its production sites, marking a commitment to fair and sustainable labour practices. On this last requirement, the member brand has shown it has taken steps towards implementing a target wage at its suppliers, but has yet to roll it out completely. Therefore, Ortovox has followed up on two out of three requirements.

#### **5 Appreciation chapter**

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

**Comments:** Ortovox provided a presenter for the Conference on Living Wages organised by the Partnership for Sustainable Textiles, titled "From Ambition to Implementation: Expanding Proven Strategies for Living Wages in Textile Supply Chains."

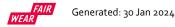
5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

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

**Comments:** Ortovox actively contributes to industry outreach, visibility and learning through its ProtAct LAB: https://www.ortovox.com/uk/protact-academy-lab/

#### **Recommendations to Fair Wear**

Ortovox recommends a considered approach to the use of data, cautioning against an over-reliance that could detract from the primary goal. The brand advises that audit reports should incorporate gender-disaggregated data to provide a more detailed analysis that could aid brands in their decision-making processes. Addressing the 'Audit Fatigue' issue has also been highlighted as a priority, suggesting a need to review the audit strategy to prevent it from becoming overly burdensome. Additionally, Ortovox recognises the importance of consistency in audit practices and offers alignment with established Fair Wear standards. It has been observed that there is a discrepancy where aggregated data is expected to be accessible within the member hub but is not being displayed, indicating a need for improvement in data sharing. Finally, the member brand underscores the importance of ensuring that any reported improvements in audit outcomes are genuine and not merely indicative, as consistency in reporting is crucial for maintaining integrity in assessments. Ortovox also suggests integration with Higg Index tools.



#### **Brand Performance Check details**

Date of Brand Performance Check: 24-10-2023

Conducted by: Jason Mandels

Interviews with: Robert Hellwig - CSR Manager Social

Katrin Bauer - Director CSR

Philipp Mattes - Head of Development Softgoods

Christian Schneidermeier - CEO