

DISCOVER FAIRNESS!

Discover
Fairness!
Aktiv für Menschenrechte.

Outdoor Companies Profiles 2012



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0) Introduction & Background

Outdoor Clothing Company Profiles Clean Clothes Campaign (CCC)

The Clean Clothes Campaign is dedicated to improving working conditions and supporting the empowerment of workers in the global garment industry. The Clean Clothes Campaign is an alliance of organisations in 15 European countries. We rely on a partner network of more than 250 organisations and unions in garment-producing countries. Members include trade unions, NGOs, women's and human rights groups and other networks of critical consumer culture and of poverty reduction.

The Clean Clothes Campaign has, for the third time, investigated the activities of international players in the outdoor clothing market, with regard to their social sustainability. This time the number of companies has been increased to 25. The

- Columbia Sportswear
- Erima
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- Vaude Sport

list of names includes the brand name as well as that of the parent company. The study focused on social issues: Working conditions in the suppliers and the companies' own strategies regarding corporate social responsibility (CSR) and social sustainability.

The profiles of the outdoor clothing brands presented in this report were based on the companies' own responses and additional research, done by the CCC. The profiles touch on the following areas:

- Transparency
- Code of Conduction
- Implementing the Code of Conduct
- Monitoring and Verification

The Company Profiles are available online at

www.evb.ch/outdoor

www.cleanclothes.at/firmen-check

www.nazemi.cz/ke-stazeni/prehled-kategorii-2.html

www.saubere-kleidung.de/index.php/outdoor/firmenprofile

What is presented here is a snapshot in time and does not claim to represent the whole picture. The cut-off date for the evaluation was the 12th April 2012. The profiles are not allowed to be used in advertising or be quoted as being "a recommendation from the CCC".



I) Human Rights and Business

Nowadays many companies carry out business in many different countries at the same time. They maintain production centres all over the world. They work with suppliers across the continents and sell their products to a global market.

The lack of governments stepping in and solving problems in many countries in the global South and East means the influence (and with that the responsibility) of international companies is increased. In the context of global production, companies have, especially in the last few years, started to grapple with with expectations of other stakeholders (campaigns, consumers as well as politics). Under the banner of CSR they have configured their value creation processes in the global procurement chain as per voluntary standards and codes of conducts. Some companies make this information publicly available in CSR reports: a step in the right direction to becoming more transparent.

CSR it as a “concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.” (The European Commission strategy paper on CSR) That means responsible business practices that go above and beyond legal requirements. Practices that need in be in effect along the whole length of the value-added chain; wherever the company’s business activity has an impact on society, the employees of the firm, the environment and the business landscape.

In 2011, under the heading ‘Human Rights and Business’, the UN-guiding principles specified by the UN Human Rights Council were approved. Some basic fundamentals as well as challenges are laid out in the pioneering document, with the aim of guarding against human rights abuses in the global value-added chain. There is reference to the ILO’s core labour standards and human rights at work. The new reference document clearly states what a company is required to do in terms of ‘Protect, Respect and Remedy’ in order to form a value-added chain that conforms to human rights standards. Societal and consumer demands in the last few years, that companies should be called to account for the negative impacts of their supply chain, are strengthened by the UN taking a position on this. Alongside the idea of what corporate social responsibility has been seen as until now, that is, in part, merely as a voluntary extra, there is now an obligation to exercise due diligence, a requirement for companies to be accountable; corporate accountability.

Further on in this report there is a more detailed description of developments in one section of the garment industry, namely outdoor clothing companies. This description is written with the understanding that the Clean Clothes Campaign is a “contributor to ethical and sustainable globalisation”, that a positive influence has, because the “social dimensions were developed from globalisation and dignified working conditions” – as it is described in the EU Strategy 2011-2014 on corporate social responsibility.

2) Survey of Companies With Regards to Corporate Social Responsibility and Social Sustainability

The Clean Clothes Campaign (CCC) is an international network that campaigns for fair and humane working conditions during the production of clothes. Under the heading 'Discover Fairness' the campaign calls on producers of outdoor clothing to satisfactorily fulfil their social responsibilities. As part of this, dialogue was initiated with the outdoor branch and the individual companies. Alongside research, the information pulled from a standardised questionnaire was instrumental in finding out to what extent international social and labour standards and human rights with regards to work are implemented.

Among other activities, the survey responses and the individual company's self-assessment covering transparency, codes of conduct and the implementation of said codes as well as monitoring and verification make it possible to document both the status quo and developments in the branch, with regards to commitments and implementation.

These four thematic issues are key criteria, because of the Clean Clothes Campaign's expertise; where the improvement of working conditions in the global supply chain is concerned. In 'Four steps to a fairer supply chain' and 'Quick-Fix - on the look out for a quick solution' which take a look at the impact of audits and verification processes, the Clean Clothes Campaign described the challenges in detail and laid out how ideas for improvements can be turned into reality.

In order to ensure the follow-through of CSR initiatives in the improvement process, it is imperative that upholding social and labour standards as well as respecting human rights at work are clearly defined as objectives for a company. Therefore a binding code of conduct is critical to improving the working conditions in the supplying factories. The code should include three essential requirements; be comprehensive, be credible and promote transparency.

An impact-oriented code rules out child- and forced labour and guarantees freedom of organisation, the right to a living wage, a maximum working week of 48 hours plus a maximum of 12 hours voluntary overtime as well as health and safety practices in effect. A focal point of a model code and also one of the CCC'S key demands is the payment of a living wage. What does this living wage include? The wage should be able to provide for the basic needs of the worker and their family and, over and above that, there remains some discretionary income. Another important point is that all parties concerned, including all business associates and manufacturers as well the workers in the factories around the world, such as in China, Indonesia or in Turkey are made aware of the contents of a code, and therefore the aim of the company's business activities.

This point, as well as others referred to below, played an important role in survey of the companies in question and the evaluation of the questionnaires

Since the first round of surveys that the CCC carried out, the all-important reference document has been the model code of conduction compiled as part of the Joint Initiative for Corporate Accountability and Workers Rights (JO-IN).

That aside, it has become clear that it is the following that makes the real difference in the implementation of CSR initiatives and human rights at work: the inclusion and training of (local) stakeholders and trade unionists. JO-IN is made up of six pragmatic organisations: Clean Clothes Campaign (CCC); Ethical Trading Initiative (ETI); Fair Labor Association (FLA); Fair Wear Foundation (FWF); Social Accountability International (SAI) and the Workers Rights Consortium (WRC). Companies were also involved in the pilot stages of the project. The JO-IN-Model code has found it's way in the policies, guidelines and practical implementations of various multi-stakeholder initiatives.

A comparison of the JO-IN-Model code, the company's own code of conduct and that of the relevant multi-stakeholder initiative is included in the evaluations contained in the company profiles that follow below. The result for any particular company can be found in the respective profile. (p 16-65) With this, the CCC wants to emphasise how corporate social responsibility standards could be further refined and specified. This statement should not be taken as a call for yet another new social standard. Rather it should be understood that what is important, is that companies make step-by-step improvements to their policy and social guidelines, striving towards the highest standards. If companies did this, it would mean guidelines across the whole sector would be orientated around the best standards and be pitched at the highest level. Companies that are already part of a multi-stakeholder initiative are recommended to drive this process forward in co-operation with everyone else involved in the initiative.

How were the company surveys carried out?

COLLECTION OF DATA

The assessment is based on a survey of the companies that produce outdoor clothing carried out in 2012. The companies were invited to fill out a questionnaire that asked about their commitments with regards to corporate responsibility (deadline 12th April 2012). The collection of data focused on four main areas: transparency, explicit recognition of labour laws (code of conduct), initiatives to implement the code of conduct and change procurement policy as well controlling and checking of minimum social standards. The study calls on both the companies' individual responses as well as additional research carried out by the CCC. The survey focused on social sustainability, in other words initiatives that aimed to improve the working conditions in supplier factories were analysed. Environmental issues, such as packaging, environmental pollution during the production and processing of textiles, the eco balance of the companies' headquarters and retail outlets as well as resource usage during transportation were not included in the questionnaire and therefore the assessment.

EVALUATION OF DATA

A total of 21 companies (out of the 25 that were asked) returned a completed questionnaire. Some of the companies also made additional, more detailed information available. In comparison to CCC questioning in 2009 and 2010 there is a noticeable increase in the number of companies that have disclosed information. The information collected was assessed using a consistent method of analysis. A database was used for this process, in which for each company approximately 160 snippets of information were collected. In the instance of a company not answering the questionnaire or individual questions within, we fell back on, where possible, publically available information.

INTERPRETING THE DATA

The portraits that have been compiled as well provide information about the particular company's corporate policy with regards to the implementation and governance of social standards. Initiatives that come from management have a very big influence on bringing about change to the situation, that the workers in producing countries find themselves in. It was assessed, as part of the company survey, to what extent corporate policies and strategies are adapted in order to step up to their responsibilities in the supply chain. A company scoring well in presented assessments does not mean that labour law abuses could not still take place. Rather it can be seen as confirmation that tools and resources are on hand to weed out abuses of human rights and labour laws and to actively bring about improvements. Actively taking part in a multi-stakeholder initiative is a step in the right direction for companies starting out on the path of strategically orientating their corporate responsibility along the whole supply chain and looking to embed a responsible mind set in company policy.

Understanding the details of the findings

COMPANY PROFILES AND SPIDER DIAGRAMS

In order to create the company profiles 26 different issues were assessed from which, with the help of the database, standardised and comparable statements for each individual company were developed.

OVERVIEW OF THE CRITERIA

The evaluation was carried out with the help of the following questions:

TRANSPARENCY:

- 1 **The companies' answers:** Has the questionnaire been filled out? If so: Has sufficient information and evidence to support the companies' claims been enclosed?
- 2 **Code of Conduct:** Has the company a publicly available code of conduct?
- 3 **Information about the supply chain:** Does the company make detailed information about its supply chain available (at the very least on request from consumers and for the CCC)?
- 4 **Reporting:** Does the company have a publicly available annual CSR report?
- 5 **Reporting on monitoring:** Are reports produced on the company's monitoring and auditing activities and / or on verification initiatives?

Companies were assessed positively if they regularly and publicly report on their activities with regards to corporate responsibility, within which they document concrete aims and objectives as well as progress and results and also provide information about their supply chain.

CODE OF CONDUCT:

- 6 **Code of Conduct:** Does the company have a code of conduct? Does the code of conduct refer to the fact that local laws must be observed and that where local and international labour standards differ from one another, the highest standard is always what should be looked to?

- 7 Assumption of responsibility:** Does the company take on the responsibility of implementing the code of conduct along the full extent of the supply chain (including subcontractors) and start following through on initiatives in accordance with the code of conduct (or management directives)?
- 8 ILO Core Labour Standards:** Does the code of conduct contain an explicit reference to the ILO's 8 core labour standards and is it made clear that these are relevant for the whole supply chain?
- 9 Living Wage:** Does the code of conduct contain a commitment to pay the living wage?

The CCC looks to number 95 and 131 of the ILO's core labour standards, to number 131 and 135 of the ILO's recommendations and to the Universal Declaration of Human Rights (article 23). A 'living wage' is defined as follows: >>Wages and other monetary benefits for a standard working week that at the very least meet legal and industry minimum standards should always be sufficient to meet the basic needs of workers and their families and over and above that provide some discretionary income.<<

The CCC defines further that the living wage:

- applies to all workers, meaning that no one receives a wage less than the living wage.
- is the wage for a standard work week consisting of maximum 48 hours;
- correlates to the net base wage for a standard work week - meaning it doesn't contain any extra payments or reimbursement of expenses;
- can provide for the basic needs of a family of two adults and two children;
- leaves a discretionary income over and above the costs of covering the family's basic needs that amounts to at least 10% of those costs.

- 10 Restrictions on working hours:** Does the company clearly state in their code of conduct that a standard working week can not exceed 48 hours and that overtime should only occasionally be required and if at all, then limited to a of maximum 12 hours a week? It is also noted that doing overtime is voluntary and must be better rewarded than the normal hourly rate?
- 11 Health & Safety at Work:** Does the code of conduct stipulate a safe and hygienic environment are physical and psychological penalties or punishments strictly forbidden?
- 12 Contract of employment:** Does the code of conduct stipulate, that workers have to be formally employed and that has to be confirmed in writing (i.e. in a written contract of employment)?
- 13 Additional points:** Are the following points explicitly covered in the code of conduct:
- a Provisions for temporary measures in the interests of the children and the family, in the instant of child labour being discovered?
 - b Special provisions for workers under the age of 18 (i.e. apprenticeships, no night shifts)?
 - c Specific steps to promote decent working conditions in countries whose national laws restrict the right of association collective bargaining?
 - d Forbidding the employer from demanding deposits and withholding ID?
 - e Ban on improper penalties especially as a response to illness or pregnancy?
 - f Ban on physical abuse or the mere threat? Ban on unusual punishments and disciplinary procedures? Ban on sexual and other forms of harassment as well as intimidation from the employer?

Companies were assessed positively if they have a comprehensive code of conduct in place that explicitly refers to the ILO's international legal norms and includes a living wage. As a **benchmark**, the CCC used the **JO-IN-Model code** that was developed collectively by the following organisations: **Clean Clothes Campaign (CCC)**, **Ethical Trade Initiative (ETI)**, **Fair Labor Association (FLA)**, **Fair Wear Foundation (FWF)**, **Social Accountability International (SAI)** and the **Workers Rights Consortium (WRC)**.

IMPLEMENTING THE CODE OF CONDUCT:

- 14 **Translation of the Code of Conduct:** Has the code of conduct been translated to the official language of all the countries from which the company buys?
- 15 **Purchase Agreement:** Does the purchase agreement clearly state that the suppliers and their respective subcontractors must adhere to the code of conduct?
- 16 **Resources for the carrying out of initiatives:** Does the company have sufficient resources to apply the code of conduct to the whole supply chain and to monitor it's related activities? Are staff members in charge of corporate responsibility based in core department of the company (i.e. in the buying department or management)?
- 17 **Training:** Does the company support the training of factory management and the workers in the factories as well as employees in head office on topics such as corporate responsibility, trade union freedom and implementation of the code of conduct? Does the company work together with NGOs and trade unions on the training sessions that take place in production countries?
- 18 **Collective Bargaining:** Does the company actively demonstrate openness towards collective bargaining and trade union activity?
- 19 **Living Wage:** Does the company have a credible method to calculate a living wage as well as a convincing strategy to implement a living wage throughout the whole supply chain?
- 20 **Risk Assessment:** Does the company carry out systematic investigations to identify countries or regions in their own supply chain that commonly see human rights abuses and restrictions or outright ban on trade union activity?
- 21 **Trade Union Freedom:** Does the company source products from countries in which trade union freedom is not guaranteed? Are any special provisions put into place, if products are sourced from such countries?
- 22 **Purchasing Policies:** Does the company make efforts to structure their purchasing practices in a way that does not hinder the implementation of the code of conduct? These include measures such as: (a) identifying particular high-risk countries and regions with regards to labour law and human rights abuses, (b) considering demands from suppliers that support the existence and activities of trade unions, (c) building long term relationships with suppliers, (d) dealing directly with suppliers (preferably avoiding middlemen), (e) planning production capacity together with the suppliers, (f) longer lead times on orders to avoid overtime, (g) integrating corporation social responsibility into purchasing decisions, (h) implementing specific regulations and incentive system for buyers and (i) preferring to award contracts to production facilities that have better working conditions.

Companies were assessed positively if they had formulated specific initiatives with regards to the implementation of the code of conduct and that said initiatives have been satisfactorily documented (and made publicly available or least on request of the CCC)

MONITORING UND VERIFIZIERUNG:

- 23 Monitoring:** How does the company monitor compliance with the code of conduct in the supply chain? Is the company a member of an auditing initiative?
- 24 Corrective Action Plans:** What does the company do in the instance a code of conduct violation being discovered? Are corrective action plans put into place that present clear and time-bound aims and objectives with regards to improvement measures and follow-up checks?
- 25 Multi-Stakeholder Initiative:** Is the company involved in a multi-stakeholder initiative that also carries out verification (auditing and monitoring activities of company initiated measures aimed at implementing and monitoring of the code of conduct)?
- 26 Inclusion of a variety of stakeholders:** Are local NGOs and trade unions actively involved in monitoring the adherence to the code of conduct?

Companies were assessed positively if they are members of initiatives that have a widely supported and credible approach (multi-stakeholder initiative like the FWF), that have compiled specific mechanisms for inspection and corrective actions and have documented these. Also assessed positively were companies that actively work with local stakeholders on getting inspections carried out.

CATEGORIES

Companies in the category 'advanced' are fully committed and belong to the forerunners of the sector. Companies in the categories 'average' and 'newcomer' are en route: they have either only just started the process of getting to grips with their company's corporate social responsibility or they have only gone to certain lengths to do so. The companies in the 'disappointing' category clearly have other business priorities and don't put social responsibility high on their agenda. The category 'deniers' is reserved for companies that did not respond in any way to the request for them to complete the CCC's survey and that have made no effort to comment on their social responsibility in publically available documents.

3) Developments within the Outdoor Clothing Branch

The outdoor clothing branch has in many respects remained very dynamic in the last few years. Despite sceptical expectations for 2012 due to 'an adverse environment and an unfavourable economic climate' as well as 'market saturation' the branch recorded growth. Europeans spend around 10 Billion Euro on kitting themselves out with outdoor clothing - everything from waterproofs to hiking boots. With a sustained growth of up to 10% the sector has become a mass market. Hardly surprising then, that big brands like Puma and Adidas also want in on the action, in a market segment traditionally characterised by medium-sized enterprises. Businesses that produce outdoor products are becoming increasingly interesting for financial investors as well. Analysts are also observing that the increase of cheap and poor quality products is saturating the outdoor clothing and sportswear market. This trend, which has been confirmed by

the European Outdoor Group, puts the price competition in the spotlight and pits it against the pre-existing quality and sustainability standards. That aside, it is safe to say that the companies are committing themselves to doing something about sustainability. Especially in the case of the European Outdoor Group (EOG) there are progressive movements and a serious approach for all to see.

The Clean Clothes Campaign has surveyed and investigated outdoor clothing companies that operate on the international stage with regard to their social sustainability for a number of seasons. In doing so the campaign engaged in critical dialogue. In addition to this, research was carried out in 2010 in two of the outdoor industry's supplier regions: China and Vietnam. The results confirmed, without doubt, the findings of the previous survey of companies; the shortcomings or more precisely the challenges that one faces in following through on corporate social responsibility (e.g. no knowledge of the code of conduct or more specifically the monitoring of such codes and the opportunity to raise grievances, low wages and excessive overtime, no or insufficient involvement of the workers in the process of monitoring and improvement.)

About a third of the companies in question had no code of conduct in place in 2009. The majority had no reference to the ILO 'core labour standards' or to 'human rights at work' down on paper. It was a rarity for an outdoor clothing company to be a member of a multi-stakeholder initiative. The information made it clear: The majority of outdoor clothing companies do not go out of their way to ensure that labour laws and social standards are adhered to.

Thanks to the survey, a higher level of transparency was able to be reached for the public.

With these topics being in the limelight and much debated, a number of individual firms engaged in dialogue with the CCC, especially those that are part of the European Outdoor Group (EOG). A number of interested parties with a variety of specialist knowledge in, for example multi-stakeholders initiatives, verification or paying the living wage, took part in discussion forums. Representatives of the Asia Floor Wage from the global South also participated.

It is plain to see that, during the process the majority of the companies have extended what sustainably means to them to include social aspects. Some companies are making serious efforts to improve the working conditions in their supplying factories: 15 have joined the Fair Wear Foundation. In doing so they have taken on the most far-reaching code of conduct of any MSI, thereby committing themselves to the policies of and, more specifically, the guidelines stated within the JO-IN-Model code. With this, due to the process of verification by an independent body, information about the company's supply chain is made available and reviewed. With the transparency gained, shortcomings are determined and improvement strategies are laid out. Progress with regard to these strategies is reported on and made public (for instance: on the FWF website).

Some companies focus their efforts solely on projects that deal with the themes on the subject of paying a living wage. The EOG supports this practical approach. In 2011 and 2012 the FWF conducted research in key production countries into the steps that needed to be taken to make a paying a living wage the reality. This research enabled the FWF to produce the 'Wage Ladder' model.

The following aspects were considered:

- How does the living wage influence pricing along the supply chain?
- Which effective measures need to be put into place, in order to increase wages?

In addition an online-tool was developed for companies that was specially customised for outdoor products.

Understanding the complexities, it is a question of taking steps in the right direction on a key topic - that of wages. The individual initiatives that come from working with the FWF are aimed at practical solutions and putting ideas for further developments into practice. Note that: achieving a living wage is connected with a whole host of other labour standards. It is necessary to adopt outcome-oriented methods and develop models of best practice.

The impact of a particular multi-stakeholder initiative and a particular company's initiatives will be measured on when and to what extent the aims and objectives of a code of conduct or CSR strategy or, more to the point, the practical steps contained within are reached - particularly by the workers in the supplier factories and their representatives.

4) Summary

After analysing the findings of the questionnaire and reflecting on the following discussions it can be concluded that:

- The importance of international labour law and human rights at work along the supply chain has come more into focus for individual companies planning their business activities.
- There is a clear group of forerunners, those that find themselves in the 'advanced' category. They are the ones that, thanks to the independent verification process and the related obligation to constantly take steps forwards and report on said steps, have taken on the challenge of improving working conditions and increasing transparency.
- It can also be stated that, on the part of some individual companies, their code of conduct has been further developed.
- Individual companies have committed themselves to wide-reaching standards, to paying the living wage and respecting human rights during the manufacture of their products. Comprehensive, no-nonsense targets have been set when it comes to social sustainability.

Establishing sustainable, ethical buying practices and making ground on increasing transparency is a positive development. In this context it can also be said that MSI membership is a worthwhile step for companies looking to advance the implementation of their code of conduct. It is the independent verification process that this entails along with the creation of corrective action plans, buying practices oriented around social standards and working together across the sector that is going to lead to greater efficiency and to the consideration of gender-related issues. That said, many surveys on the implementation of CSR have revealed that the follow through from auditing and awarding certificates to production facilities will always be minimal; that is if fundamental and structural problems are not recognised and therefore unable

to be dealt with. Working together constructively as part of a MSI and during the verification process offers a greater opportunity to root out problems and shortfalls and therefore set the needed improvements in motion.

Once again, in 2012, it became clear to the CCC that, unfortunately, some of the companies surveyed are not at all willing to tackle the issues surrounding social and labour standards and human rights at work. There is also a small group of companies that publish nothing to the public on these matters and did not respond to the CCC's request for such information.

Challenges

Many problems with regards to human rights at work that have been discovered in the textile and garment industry are directly linked to pitifully low wages. The wage level leads to excessive overtime. In response to disputes (but also, all too often, for no reason at all) workers are faced with intimidation. In addition trade union activities, the freedom of organisation and collective bargaining are obstructed.

The payment of a living wage is therefore a key issue. Knowing that, companies must resolutely work towards making "a working week of 48 hours maximum for which workers receive a living wage" the reality for all the workers in their supply chains.

The CCC strongly recommends companies set up a step-by-step approach:

- A code of conduct that embeds, explicitly and bindingly, the right to a living wage for all.
- Initiatives for the implementation of a living wage:
 - Recognition of the wages proposed by the Asia Floor Wage Alliance as the reference point for a living wage.
 - Creation and publication of an implementation plan (including a time scale, the aims, objectives and suggested milestones as the evaluation criteria of implementation)
 - For example: running a pilot project with the Asia Floor Wage Alliance, developing measures that need to be taken to effectively implement a living wage at factory level.
- Actively supporting the working together with trade unions in production countries, thereby enabling the workers to organise and stand up for their rights without hindrance.

More information: 10 steps to an AFW living wage:

www.asiafloorwage.org/documents/Route%20map%20to%20the%20AFW_March%201%202011.pdf

As a conclusion of the survey, it can also be said that, alongside the few very committed companies, there are still many companies who really need to catch up on the social sustainability agenda.

These companies should:

- Create and publish a comprehensive code of conduct (including reference to relevant UN/ILO standards)
- Develop and publish specific measures to implement the code of conduct.
- Report on their business activities and supply chain in the name of transparency.
- Join a credible multi-stakeholder initiative and involve workers and trade unionists in monitoring and verification activities.

The Clean Clothes Campaign is hopeful that the challenges listed above for those 'reaching for the summit' of the outdoor clothing sector will be tackled constructively, so that workers are not paid poverty wages and repressed on a daily basis.

To understand sustainability in its broadest context is to understand that the right to development is a human right. This includes, then, not only seeing to it that appropriate social and working conditions are the reality. To that end: 'Discover Fairness. Stand up for Human Rights'

5) Glossary

In this following section a number of key terms will be explained:

Living Wage A living wage or subsistence wage is a base net wage paid for a standard working week of a maximum of 48 hours that is sufficient to meet the basic needs of workers and their families (that is to say: shelter, power supply, nutrition, clean drinking water, clothing, health care, education, childcare, transport). Over and above that some discretionary income is left over to enable, for example, putting some money aside for the future.

Asia Floor Wage - AFW A broad coalition of Asian labour rights organisations and other groups seeking to implement a living wage as a base wage throughout Asia, with a particular focus on the garment industry. Armed with a special kind of exchange rate calculation (that of the purchasing power of the wages in the different countries - using the World Bank's concept of purchasing power parity), they have put forward benchmarks for a base wage in different countries. Their method of calculating the benchmark is transferable to any number of countries and has received extensive support from labour rights organisations and trade the world over.

The Clean Clothes Campaign supports the coalition of organisations that make up the Asia Floor Wage and their work. www.asiafloorwage.org

ILO Core Labour Standards The United Nations International Labour Organisation (ILO) core labour standards were agreed upon at the 86th session of the International Labour Conference. With that the member states all committed themselves formally to the core labour standards, whether or not they ratified the individual standards contained within. Four fundamental principles determine the ILO's ethos and activities: freedom of association and the right to collective bargaining, the elimination of forced and compulsory labour, the abolition of child labour, and the elimination of discrimination in the workplace. These fundamental principles have their home in eight conventions, also known as the core labour standards

- No. 87/1948 - Freedom of Association and Protection of the Right to Organise Convention
- No. 98/1949 - Right to Organise and Collective Bargaining Convention, 1949
- No. 105 - Abolition of Forced Labour Convention
- No. 100/1951 - Equal Remuneration Convention
- No. 111/1958 - Discrimination (Employment and Occupation) Convention
- No. 138/1973 - Minimum Age Convention
- No. 182/1999 - Worst Forms of Child Labour Convention

In addition to the core labour standards there are other binding and relevant ILO conventions with respect to human rights at work:

- ILO Conventions number 29, 87, 98, 100, 105, 111, 135 and 138: a sufficient wage and humane working conditions must be assured for all employees.
- According to the ILO Conventions that reference minimum wage (No. 26/1928 and No.131/1970), the minimum wage must, at the very least, be sufficient to provide for the basic needs (nutrition, clothing and shelter) of the workers and their families.

This position was further strengthened by the ILO Declaration on Fundamental Principles and Rights at Work of 1998 as well as by papers on the Decent Work Agenda and Living Wage.

- ILO Convention No. 01/1921: A limit to the weekly working hours in industrial undertakings of 48 hours and a maximum of 12 (voluntarily undertaken) hours overtime will be considered appropriate working hours. With that in mind, the hours of work should be organised in such a way as to be socially acceptable and support a healthy work ethic that rules out excessively long shifts.

Joint Initiative for Corporate Accountability and Workers Rights (JO-IN) The JO-IN saw six organisations companies come together with a number of companies to work towards practically oriented goals. The initiative has developed a model code of conduct and the 'Wage Ladder' model. The following organisations were involved: the Clean Clothes Campaign (CCC); Ethical Trading Initiative (ETI); Fair Labor Association (FLA); Fair Wear Foundation (FWF); Social Accountability International (SAI) and the Workers Rights Consortium (WRC).

Ethical Trading Initiative (ETI) Companies, trade unions and NGOs have joined forces under this British multi-stakeholder initiative. The initiative promotes networking, knowledge exchange and learning, to implement the best possible social standards and to improve the audit procedures testing suppliers' compliance with social standards. That work includes research into a variety of monitoring and verification models and comparing their strengths and weaknesses.

Fair Labor Association (FLA) Based in the USA, the FLA monitors the compliance with social standards in the factories that supply its member organisations including, among others, Nike, Adidas and Puma. Representatives of NGOs and universities are also part of FLA. The FLA carries out verifications.

Fair Wear Foundation (FWF) Alongside clothing companies, trade unions and NGOs - among others, the CCC - are involved in the Netherlands-based foundation. The suppliers of this multi-stakeholder initiative are verified.

Social Accountability International (SAI) This multi-stakeholder initiative counts the following among its participants: NGOs, trade unions and companies as well as representatives of New York City and the UN. The suppliers of their member companies are called upon to comply with the SAI Code of Conduct.

SA8000 A system of certification of suppliers worldwide that was initiated by the multi-stakeholder initiative Social Accountability International (SAI). A certification in accordance with SA8000 means a green light from the supplier - that they are willing to be audited and to comply with (the most important) social standards. It is important to note that NGOs are, for all intents and purposes, not satisfactorily involved in the auditing process. Therefore it cannot claim to be an independent verification system of the standards. The auditors are paid directly by the certified companies.

Business Social Compliance Initiative (BSCI) BSCI is an industry-led initiative that was founded to prevent the threat of reputation damage to big brands and retail enterprises,

due to inhumane conditions in the supply chain, by aligning different auditing processes. Over 600 companies are members of this initiative at the moment. The BSCI standard now includes an opt-in payment of the living wage. Independent verification methods are not included. There is no clear obligation for the companies to define a buying policy that would support suppliers in improving working conditions. After five and a half years BSCI members have to provide evidence that their suppliers are, following improvement, now 'the good ones'. The problem with this is that, in extreme cases, it can mean that the companies simply cut ties with the supplier in question and cease working together with that supplier.

The European Outdoor Group (EOG) The world's 19 largest outdoor clothing companies founded the EOG in 2003. It represents the interests of the outdoor industry and facilitates working groups on sustainability. The EOG counts most of the biggest outdoor clothing companies as members.

International Register of Certificated Auditors (IRCA) What the IRCA does is self-explanatory: it holds an international register of certificated auditors.

Institute of Environmental Management and Assessment (IEMA) What the IEMA does is also self-explanatory: environmental management and assessment. The Institute carries out environmental management training across the globe.

bluesign®- The independent industry textile standard Many of the companies surveyed use the bluesign® standard issued by the Swiss certifier bluesign technologies ag. It focuses on environmental protection and health and safety along the full length of the textile supply chain. By permanently monitoring all the processes that make up the chain of production, the following should be ensured: resource productivity, consumer protection, correct handling of waste air and water, workplace safety in the process chain. The standard claims to be able to guarantee that products of the complete production chain only contain components that are harmless to people and the environment. Although workplace safety is considered during this process, social standards and working conditions are not. There is also no independent multi-stakeholder inspection. As far as we are aware, issues such as organic materials and genetically modified raw materials are also not considered. Furthermore, the claim that all processes along the chain of production are permanently monitored has not been evidenced.

The report 'Chemistry for any weather', published by Greenpeace in 2012 tested for perfluorinated toxins outdoor in clothes. Most of the outdoor clothing companies use perfluorinated and polyfluorinated compounds (PFCs) in their clothes, in order to keep them dry from the inside and out. The man-made compounds of carbon and fluorine are so stable that they can only be removed from the environment with difficulty, if at all. In some products perfluorooctanoic acid (PFOA) was also discovered which is harmful to human health. With the knowledge of the harmful properties of many PFCs, it is not enough to regulate individual substances such as PFOA. Greenpeace calls for all PFCs to be put into question and for complete withdrawal from their use.

Bluesign favours the determination of limits and monitoring of said limits. In the light of information currently available, PFCs do not come under the list of checked-for substances.

Eco-Management and Audit Scheme (EMAS) EMAS is a system of environmental management and environmental audit measures for organisations voluntarily seeking to improve their environmental performance. It was developed by the European Union in 1993. A key component of EMAS is the international environmental management standard DIN EN ISO 14001.

International Organisation for Standardisation (ISO) Certification The ISO certification evidences compliance with certain globally recognized standards. First and foremost it is about the standardisation of the technical parameters of industry products. ISO standards were designed by companies aimed, foremost, at increasing efficiency rather than in response to social or environmental concerns. Input into the standardisation process from organisations coming from the non-profit arena had limited impact.

Global Organic Textile Standard (GOTS) GOTS was developed by the International Association of Natural Textile Industry (iVN) from Germany together with the Soil Association (SA) from England, the Organic Trade Association (OTA) in the USA and the Japan Organic Cotton Association (JOCA) in Japan. At least 70% of the fibres in a GOTS-certified come from organic farms (or farms in the process of switching to organic). Above all, it is how the fibres are processed and what material can be used that is regulated. The process that is followed means that it is highly unlikely that any harmful substances will end up in the final product.

It should, however, be noted that natural fibres, like cotton, play a very small role in percentage terms in outdoor clothing. In this context, the argument from the sector is that the required functionality (insulation, protection, breathability, etc.) is hard to achieve with natural fibres.

Verification The term verification implies the inspection of a monitoring process. The independent verification (that takes place within the scope of a multi-stakeholder initiative) aims to ascertain whether or not a company's monitoring process covers observation of the crucial areas in order to recognise problems and to solve them in a targeted and effective manner.

Certification Certification denotes attestation that a product, a place of work, a company or similar meets a particular standard.

6) Company Profiles

	Columbia Sportswear • www.columbia.com
Headquarters	Portland
Country	USA
Founded in	1938
Turn over	EUR 1,308 bn (USD 1.7 bn)
Profit	EUR 79,593 m (USD 103,479 m)
Total points of sale	167 (retail stores)
Owned by	publicly traded company (Nasdaq: COLM)
Name of CEO	Timothy P. Boyle
Product description	Brands: Columbia Sportswear, Sorel, Mountain Hardwear, Montrail, Pacific Trail, OutDry Products: Garment (72% of the turnover), Shoes (21% of the turnover), Others (7% of the turnover)
Countries of production	USA, Dominican Republic, El Salvador, Guatemala, Nicaragua, Uruguay, Asia, Bangladesh, Cambodia, China (People's Republic of China), India, Indonesia, Japan, Jordan, South Korea, Pakistan, Philippines, Sri Lanka, Taiwan, Thailand, Vietnam, Europe, Italy, Slovenia
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on an additional research conducted by the CCC:</p> <p>Columbia Sportswear was set up in 1938 and is now one of the world's biggest producers of outdoor clothes. Columbia's products are sold in more than 100 countries. The company has adopted a code of conduct (Standards of Manufacturing Practices) and a manual for its implementation and verification. The Code of conduct references the ILO Conventions and touches on freedom of association and collective bargaining and is mandatory for all of Columbia's production sites. Columbia states, that it has remediation measures for violations of the working conditions, however, the company is not willing to disclose any specific policies. The company has made several statements concerning ethical sourcing, such as not sourcing cotton from Uzbekistan - as it's thought forced child labour is still very common there.</p> <p>Columbia Sportswear is a so-called 'category B licensee' in the multi-stakeholder initiative Fair Labor Association (FLA). This means the company has committed itself to having at least a part of its supply chain audited in line with the FLA guidelines. It also means they have committed to paying the legal minimum wage and to observing other industry standards.</p> <p>To enhance the credibility of their corporate policies in this area, Columbia should become a fully-fledged member of a multi-stakeholder initiative and thereby include the whole of its supply chain in relevant verification processes and work on implementing the living wage.</p>	

Transparency

Columbia Sportswear has filled in the CCC questionnaire and has provided additional documents. Columbia Sportswear's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. Columbia Sportswear provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

Columbia Sportswear has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Columbia Sportswear declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company does not formally commit to restrictions on the number of working hours per week. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- special provisions for workers under 18 years of age (e.g. education, no night work)
- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- prohibiting the retention by employers of security deposits or identity papers
- guaranteeing a living wage during regular working hours without overtime

Formal commitment to labour standards

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Columbia Sportswear declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. According to the information given Columbia Sportswear has no intention to implement the payment of living wages for all workers involved in the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. Some information about the company monitoring findings is available. Columbia Sportswear makes use of corrective action plans when labour rights violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Labor Association (FLA) - B member.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Columbia Sportswear would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 135,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	ERIMA GmbH • www.erima.de
Headquarters	Pfullingen
Country	Germany
Founded in	1900
Turn over	n.a.
Profit	n.a.
Total points of sale	3.500
Owned by	Wolfram Mannherz
Name of CEO	Wolfram Mannherz
Product description	Garment (80% of the turnover) Bags (5% of the turnover) Balls, Shin Guards, Goalkeeper Gloves, Accessories (15% of the turnover)
Countries of production	Burma (Myanmar), China (People's Republic of China), Indonesia, Pakistan, Thailand, Turkey, Belgium, Germany, Poland
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>The Germany-based company ERIMA specialises in outdoor clothing and sportswear for volleyball, handball and football, among other sports. The company is the Austrian Olympic Committee's official supplier and as such, kitted out the Austrian Olympics for London 2012.</p> <p>ERIMA's Code of Conduct is not publicly available. Although the company claims to follow a code, ERIMA did not provide the Clean Clothes Campaign with a copy. In terms of their monitoring activities the company proved to be more transparent and they made various audit reports available to the CCC. The range of reports show that ERIMA has not yet established a systematic monitoring process of its suppliers. A positive step towards effective and transparent corporate responsibility for ERIMA would be for them to become member of a credible verification initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>ERIMA has filled in the CCC questionnaire and has provided additional documents. ERIMA's code of conduct is not publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. ERIMA provides results of factory audits but there are no reports with results of verification through a MSI available.</p>	
<p>Formal commitment to labour standards</p> <p>ERIMA doesn't commit in a public document to respect the Universal Declaration of Human Rights and the national law. The company is neither publicly committed to wages in accordance with living wage principles nor with legal minimum wage legislation. According to the information given the company does not commit to restrictions on the number of working hours per week and does not call for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers.*</p>	

Code implementation and purchasing practices

It is unclear, if the buying contract does include the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by ERIMA. According to the information given ERIMA has no intention to implement the payment of living wages for all workers involved in the supply chain. ERIMA has not shown that it is aware of the fact that part of its production sites are located in countries or zones where freedom of association is not guaranteed by law. We are afraid, that the company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way. According to the information given there are no provisions to give buyers positive incentives in order to take working conditions in the factories into account and give preference the productions sites with good labour conditions to place orders.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. Some information about the company monitoring findings is available. ERIMA did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), ERIMA would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	Fjällräven • www.fjallraven.se
Headquarters	Örnskölsvik
Country	Sweden
Founded in	1960
Turn over (Fenix Outdoor Group)	EUR 178,2 m (SEK 1.531,9 m)
Profit (Fenix Outdoor Group)	EUR 19,5 m (SEK 167,3 m)
Total points of sale	1.900
Owned by	publicly traded company
Name of CEO	Martin Axelhed
Product description	Brands of Fenix Outdoor: Fjällräven, Brunton, Hanwag, Tierra, Primus Products: Garment (85% of the turnover), Bags (9% of the turnover), Sleeping bags (1% of the turnover), Others (5% of the turnover)
Countries of production	China (People's Republic of China), India, Sri Lanka, Taiwan, Vietnam, Lithuania, Poland, Portugal, Sweden
Comment from CCC	
<p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Fjällräven belongs to the Swedish company Fenix Outdoor. Other brands under the Fenix Outdoor umbrella are Brunton, Hangwag, Tierra and Primus. In 2011 Fjällräven began to improve its transparency and take a more systematic approach to social and environmental issues. These efforts were evidenced by the creation of a new post within Fenix Outdoor: 'Chief Sustainability Officer' and by the adoption of Fenix Outdoor's sustainability guidelines, the so-called 'Fenix Way'. The revised version 'Fenix Way' was released after the start of the CCC's surveying in April 2012 and as such could not be included this time around.</p> <p>Further improvements to standards can therefore be expected from Fjällräven in the next few years. A positive trend can be seen in the area of checking up on compliance. Fjällräven is planning to cooperate with the multi-stakeholder initiative Fair Labor Organisation (FLA) in 2013. It is important to note Fjällräven has not set themselves the goal of implementing the living wage - which is one of the CCC's key demands.</p>	
Transparency	
<p>Fjällräven has filled in the CCC questionnaire and has provided detailed additional documents and information. Fjällräven's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Fjällräven provides results of factory audits but there are no reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Fjällräven has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Fjällräven declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). Though the code does not include measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct does not state that working hours are restricted to 60 hours per week (48hours plus 12h of overtime) but it is specified that overtime may occur only occasionally. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- payment of overtime at a premium rate
- guaranteeing a living wage during regular working hours without overtime
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into some of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Fjällräven. According to the information given Fjällräven has no intention to implement the payment of living wages for all workers involved in the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. Some information about the company monitoring findings is available. Fjällräven makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Fjällräven would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 182,87,98,135,100, 111,29,105,1,81,122,131,154,155,159,175,177, 183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	Haglöfs • www.haglofs.com
Headquarters	Avesta
Country	Sweden
Founded in	1914
Turn over	n.a.
Profit	n.a.
Total points of sale	1.500
Owned by	Asics Corp
Name of CEO	Nicolas Warchalowski
Product description	Brand: Haglöfs Products: Garment (70% of the turnover) Shoes (10% of the turnover) Bags (15% of the turnover) Sleeping bags (5% of the turnover)
Countries of production	China (People's Republic of China), Turkey, Vietnam, Estonia, Portugal, Romania, Sweden
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Haglöfs was founded in 1914 and is expanding globally. The company guidelines reference the need to integrate social and ecological aspects into corporate development. Haglöfs became member of the multi-stakeholder initiative Fair Wear Foundation (FWF) in April 2012. With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes.</p> <p>In April 2013, after a year of FWF membership, the company will undergo an extensive „Performance Check“ which will be published on the Fair-Wear Foundation website. This will ensure a high level of transparency in progress made and challenges to improving working conditions. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Haglöfs takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families. Employees at the heart of the brand are responsible for coordinating CSR activities.</p> <p>Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Haglöfs.</p>	
<p>Transparency</p> <p>Haglöfs has filled in the CCC questionnaire and has provided additional documents. Haglöfs' code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Haglöfs provides results of factory audits but there are no reports yet with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Haglöfs has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Haglöfs declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48 hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to**:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Haglöfs. Haglöfs agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Haglöfs makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Haglöfs would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183, and the ILO recommendations: 35,90,146, 164,168,184,190.

	Helly Hansen • www.hellyhansen.com
Headquarters	Oslo
Country	Norway
Founded in	1877
Turn over	EUR 170 m (2010)
Profit	n.a.
Total points of sale	n.a.
Owned by	Altor Equity Partners
Name of CEO	Peter Sjolander
Product description	Brand: Helly Hansen Products: Garment (94% of the turnover), Shoes (5% of the turnover), Bags (1% of the turnover)
Countries of production	China (People’s Republic of China), Indonesia, Philippines, Sri Lanka, Thailand, Turkey, Vietnam, Poland, Sweden, Ukraine
<p>Comment from CCC</p> <p>The following evaluation of the company’s performance in terms of transparency, code implementation and monitoring of labour standards is based on the company’s response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>The Norwegian company Helly Hansen was founded in 1877 and initially specialised in the production of waterproof outerwear for sailors. Today, Helly Hansen produces work- and outerwear, namely for the outdoor- and sports sector. Helly Hansen provided the CCC with numerous documents in addition to their survey responses. Generally speaking, the company is progressive and transparent when it comes to bettering working conditions in the supply chain. The code of conduct references several ILO Core Conventions such as anti-discrimination, freedom of association, the right to collective bargaining, and the banning of child labour.</p> <p>However, in several well-known problem areas, such as overtime and pay, the company looks to national legislation. It is widely documented that national legislation has very low standards and that laws are often not upheld. The company tries to prevent factories making workers work overtime by providing suppliers with detailed plans for the production season. With regards to wages, the code of conduct states: Wages must, at the very least, be the national minimum wage or the standard industry wage, whichever is higher. Wages must always be enough to meet the basic needs of the employee, as determined by the country’s social standards. However, Helly Hansen does not specify paying a ‘living wage’.</p> <p>A positive step towards effective and transparent corporate responsibility for Helly Hansen would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Helly Hansen has filled in the CCC questionnaire and has provided additional documents. Helly Hansen’s code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. Helly Hansen provides results of factory audits but there are no reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Helly Hansen has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Helly Hansen declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. It is therefore not a living wage. The company does not formally commit to restrictions on the number of working hours per week. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- special provisions for workers under 18 years of age (e.g. education, no night work)
- payment of overtime at a premium rate
- guaranteeing a living wage during regular working hours without overtime
- prohibiting arbitrary penalties, above all in case of sickness or pregnancy

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Helly Hansen. According to the information given Helly Hansen has no intention to implement the payment of living wages for all workers involved in the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Helly Hansen makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder initiative coordinated by ETI Norway. This MSI does not provide an independent verification of the member companies.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Helly Hansen would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 135,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,146,164,168,184,190).

	Icebreaker Ltd • www.icebreaker.com
Headquarters	Wellington
Country	New Zealand
Founded in	1995
Turn over	EUR 102 m (NZD 161 m) (2011/12)
Profit	n.a.
Total points of sale	1.335 (Europe), appr. 3.000 (globally)
Owned by	privately owned
Name of CEO	Jeremy Moon
Product description	Brand: Icebreaker Products: Garment (100% of the turnover)
Countries of production	USA, China (People's Republic of China)
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Icebreaker was founded in 1995 as a private company and has its headquarters in New Zealand. Icebreaker doesn't explicitly commit itself to paying a living wage, rather that is labelled as a 'target requirement' and the minimum wage level is the national minimum wage. It would appear that Icebreaker doesn't carry out any audits on its suppliers. According to the information provided, the company is considering implementing an external monitoring system. There is no independent verification of labour standards by a multi-stakeholder initiative in their supply chain.</p> <p>A positive step towards effective and transparent corporate responsibility for Icebreaker would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Icebreaker has filled in the CCC questionnaire and has provided additional documents. Icebreaker's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. Icebreaker provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

Icebreaker has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Icebreaker does not declare that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct does not include all fundamental labour standards and does not make an explicit reference to the ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime) but it allows exceptions of working weeks with more than that. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- special provisions for workers under 18 years of age (e.g. education, no night work)
- prohibiting the retention by employers of security deposits or identity papers
- guaranteeing a living wage during regular working hours without overtime
- prohibiting arbitrary penalties, above all in case of sickness or pregnancy
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Icebreaker. According to the information given Icebreaker has no intention to implement the payment of living wages for all workers involved in the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Icebreaker did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Icebreaker would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175, 177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	Jack Wolfskin • www.jack-wolfskin.com
Headquarters	Idstein
Country	Germany
Founded in	1981
Turn over	EUR 355 m
Profit	n.a.
Total points of sale	appr. 4.000 (Europe)
Owned by	Blackstone Group
Name of CEO	Michael Rupp
Product description	Brand: Jack Wolfskin Products: Garment (main part), Shoes, Equipment
Countries of production	Bangladesh, Cambodia, China (People's Republic of China), India, Indonesia, Vietnam, South Korea (Republic of Korea), Taiwan, Thailand, Turkey, Bulgaria, Italy, Romania, Slovenia

Comment from CCC

The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:

Jack Wolfskin began life in 1981 as a brand name of the company Sine in Frankfurt. Jack Wolfskin produces, in the main, clothes, shoes and other equipment such as tents, rucksacks and sleeping bags for life in the great outdoors. The products are on sale across Europe and well as in Asia.

Jack Wolfskin has been a member of the Fair Wear Foundation (FWF) since mid 2010. With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes.

Jack Wolfskin's 2011 Social Report as well as a so called 'Brand Check' from 2012 are available on the FWF Website. The FWF states that Jack Wolfskin meets all their management system requirements and, what's more, goes above and beyond several of them; there is a high level of transparency with regards to the progress of and challenges to improving working conditions. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Jack Wolfskin takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families. Jack Wolfskin has a department that is solely responsible for the auditing of the supply chain.

In 2011 Jack Wolfskin showed its not all talk and put its guidelines into action in dealing with complaints from workers. They responded quickly to calls from Indonesian workers - even before the FWF's complaint procedure had kicked in, Jack Wolfskin had started to solve with the problem. In order to resolve the issue Jack Wolfskin actively sought to work with other companies that also use the same supplier.

Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Jack Wolfskin.

Transparency

Jack Wolfskin has filled in the CCC questionnaire and has provided detailed additional documents and information. Jack Wolfskin's code of conduct is publicly available through internet, shops or other ways. Jack Wolfskin provides information about the sourcing structure and producing countries. A social report is publicly available. Jack Wolfskin provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

Jack Wolfskin has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Jack Wolfskin declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Jack Wolfskin declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. Jack Wolfskin agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Jack Wolfskin makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Jack Wolfskin would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,175,177 and the ILO recommendations: 35,168,184,190).

	Kaikkialla (Eurofamily) • www.kaikkialla.com
Headquarters	Bozen
Country	Italy
Founded in	2000
Turn over	EUR 150 m (2010)
Profit	n.a.
Total points of sale	n.a.
Owned by	Eurofamily
Name of CEO	Christoph Schmid (Eurofamily)
Product description	Brands owned by Eurofamily: Meru, Kaikkialla, HotStuff Products: garment, shoes, bags, sleeping bags, tents, mattresses, accessories
Countries of production	Bangladesh, China (People's Republic of China), India, South Korea (Republic of Korea), Taiwan, Thailand, Vietnam, Europe, Moldova
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>The brand Kaikkialla belongs to "Eurofamily", a pan-European association of sport & outdoor retailers from Germany, Italy, Austria and Switzerland. The company "Globetrotter Ausrüster" is a member of this association and sells the brand Kaikkialla in its shops. Although the owners of Kaikkialla formally commit themselves to sustainable production conditions and social standards, their activities in and around implementing the ILO's core labour standards and human rights at work seem to be limited. Fair working conditions are not directly mentioned.</p> <p>A positive step towards effective and transparent corporate responsibility for Kaikkialla would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Kaikkialla has filled in the CCC-questionnaire but has not provided any additional documents. Kaikkialla's code of conduct is publicly available through internet, shops or other ways. The information given about producer countries and the structure of supply chain is not comprehensive. A social report is publicly available. Kaikkialla provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

Kiakkialla has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Kiakkialla does not declare that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48 hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- guaranteeing a living wage during regular working hours without overtime

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Kiakkialla. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way.

Monitoring and Verification

The company is participating in a business driven monitoring initiative: BSCI. Kiakkialla makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Kaikkialla would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,175,177 and the ILO recommendations: 35,90,111,168,184).

	Kilimanjaro • www.hervis.at
Headquarters	Salzburg
Country	Austria
Founded in	n.a.
Turn over	n.a.
Profit	n.a.
Total points of sale	n.a.
Owned by	Hervis Sport- und Modegesellschaft m.b.H.
Name of CEO	Reisch Hans Klaus, Eichblatt Alfred (CEO HERVIS Sport- und Mode- gesellschaft m.b.H.)
Product description	Products: garment, outdoor-equipment
Countries of production	n.a.
<p>Comment from CCC</p> <p>As Kilimanjaro did not respond to the CCC's questionnaire, the following evaluation of the company's corporate responsibility activity is based solely on research carried out by the CCC:</p> <p>Kilimanjaro is a brand name under which the sportswear chain Hervis sells its outdoor products. It is not known whether the company requires its suppliers to comply with social standards in accordance with international labour law. Kilimanjaro is not involved in independent monitoring and verification processes to monitor compliance with minimum labour standards.</p> <p>A positive step towards effective and transparent corporate responsibility for Kilimanjaro would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Kilimanjaro did not fill in the CCC-questionnaire. Kilimanjaro's code of conduct is not publicly available through internet, shops or other ways. No information on sourcing structure, producing countries and suppliers is available. There is no social report available. Kilimanjaro provides neither the results of factory audits nor are MSI verification reports available.</p>	
<p>Formal commitment to labour standards</p> <p>Kilimanjaro doesn't commit in a public document to respect the Universal Declaration of Human Rights and the national law. The company is neither publicly committed to wages in accordance with living wage principles nor with legal minimum wage legislation. According to the information given the company does not commit to restrictions on the number of working hours per week and does not call in a public document for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers.*</p>	

Code implementation and purchasing practices

It is unclear, if the buying contract includes the obligation for the suppliers and all their subcontractors to comply with a code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Kilimanjaro. According to the information given Kilimanjaro has no intention to implement the payment of living wages for all workers involved in the supply chain. We are afraid, that the company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way. According to the information given there are no provisions to give buyers positive incentives in order to take working conditions in the factories into account and give preference the productions sites with good labour conditions to place orders. Kilimanjaro did not provide any information on measures that show how to improve planning and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Kilimanjaro did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Kilimanjaro would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175, 177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	Lowa Sportschuhe GmbH • www.lowa.de
Headquarters	Jetzendorf
Country	Germany
Founded in	1923
Turn over	EUR 143 m
Profit	n.a.
Total points of sale	n.a.
Owned by	Ruggero Zanatta, Werner Riethmann, Renzo Castellani
Name of CEO	Werner Riethmann
Product description	Brand: Lowa Products: Shoes
Countries of production	China (People's Republic of China), Bosnia and Herzegovina, Croatia, Germany, Hungary, Italy, Portugal, Slovakia
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>The company LOWA Sportschuhe GmbH was founded by Lorenz Wagner and produces shoes. Production takes place in a company-owned factory and products are sourced from Europe and China.</p> <p>It is worth noting that the company not only answered the CCC's questionnaire but also provided information about CSR practices and made their supplier list available.</p> <p>Lowa doesn't explicitly commit itself to paying a living wage, rather that is labelled as a 'target requirement' and the minimum wage level is the national minimum wage. There is no independent verification of labour standards by a multi-stakeholder initiative in their supply chain.</p> <p>A positive step towards effective and transparent corporate responsibility for Icebreaker would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Lowa has filled in the CCC questionnaire and has provided additional documents. Lowa's code of conduct is not publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. Lowa provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

Lowa has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Lowa does not declare that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48 hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers
- guaranteeing a living wage during regular working hours without overtime
- prohibiting arbitrary penalties, above all in case of sickness or pregnancy

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Lowa declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. According to the information given Lowa has no intention to implement the payment of living wages for all workers involved in the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Lowa makes use of corrective action plans when labour rights' violations are detected and provided coherent examples of such plans. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Lowa would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,175,177,183 and the ILO recommendations: 35,168,184,190).

	Maier Sports GmbH • www.maier-sports.de
Headquarters	Koengen
Country	Germany
Founded in	1938
Turn over	EUR 31,68 m
Profit	n.a.
Total points of sale	2.000
Owned by	Hermano GmbH
Name of CEO	Sascha Kautschitsch
Product description	Brands: Maier Sports, Gonso, RONO; US40, Brands shares: Bergson Products: Garment (100% of the turnover)
Countries of production	China (People's Republic of China), India, Turkey
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Maier Sports was founded in 1938 and is a German company for outdoor, sports and fashion with production in Turkey, China and India. The company produces exclusively clothing. In 2011 Maier Sports became a member of the multi-stakeholder initiative, the Fair Wear Foundation (FWF). With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes. This ensures there is a high level of transparency with regards to the progress of and challenges to improving working conditions.</p> <p>During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Maier Sports takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families.</p> <p>Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Maier Sports.</p>	
<p>Transparency</p> <p>Maier Sports has filled in the CCC questionnaire and has provided additional documents. Maier Sports' code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Maier Sports does not provide the results of factory audits. There are no reports yet with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Maier Sports has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Maier Sports declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48 hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Maier Sports declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. Maier Sports agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime

Monitoring and Verification

Maier Sports makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Maier Sports would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183 and the ILO recommendations: 35,90,146,164, 168,184,190).

	Mammut Sports Group AG • www.mammut.ch
Headquarters	Seon
Country	Switzerland
Founded in	1862
Turn over	EUR 174 m (CHF 210,8 m)
Profit	n.a.
Total points of sale	n.a.
Owned by	Conzzeta AG
Name of CEO	Rolf Schmid
Product description	Brand: Mammut Products: Garment (68% of the turnover) Shoes (11% of the turnover) Bags (6% of the turnover) Sleeping bags (3% of the turnover)
Countries of production	China (People's Republic of China), India, Philippines, Turkey, Vietnam, Germany, Italy, Latvia, Portugal, Romania
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Mammut already had a code of conduct in place twelve years ago. They joined the Fair Wear Foundation in October 2008. With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes.</p> <p>Mammut's 2011 Social Report as well as a 'Brand Performance Check' from 2011 are available on the FWF website. The FWF states that Mammut meets all their management system requirements. There is a high level of transparency with regards to their progress in improving working conditions and the challenges they face in doing so. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Mammut takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families.</p> <p>Mammut has been an active advocate of the FWF within the outdoor clothing sector and has come together with other brands that share suppliers to work collectively on improving conditions.</p> <p>According to the FWF, Mammut employees receive regular updates about the company's CSR activities and that of the FWF. Employees in key positions are responsible for coordinating CSR work. An integral part of Mammut's corporate policy is to maintain a stable supplier base and to foster long lasting business relationships. Mammut currently has 27 suppliers and they source 75% of their products from suppliers with whom they have been in business for more than five years.</p> <p>Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Mammut.</p>	

Transparency

Mammut has filled in the CCC questionnaire and has provided additional documents. Mammut's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Mammut provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

Mammut has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Mammut declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Mammut declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. Mammut agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Mammut makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Mammut would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183 and the ILO recommendations: 35,90,146,164,168, 184,190).

	Marmot Mountain • www.marmot.eu
Headquarters	Santa Rosa
Country	USA
Founded in	1974
Turn over	n.a.
Profit	n.a.
Total points of sale	appr. 800
Owned by	Jarden Corporation
Name of CEO	Marmot USA: Mark Martin (President), Marmot Mountain Europe: Andy Schimeck (Managing Director)
Product description	Brand: Marmot Products: Garment, Bags, Sleeping bags, Tents
Countries of production	Costa Rica, El Salvador, United States of America, Bangladesh, China (People's Republic of China), India, Indonesia, Malaysia, Pakistan, Thailand, Vietnam, Germany
Comment from CCC	
<p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Marmot was set up in 1974 by two students from the University of California Santa Cruz, who were inspired by a school project in Alaska. Today, Marmot products are sold in 60 countries. The company issued a code of conduct and an implementation handbook for suppliers with regards to both environmental and social compliance. The code does not reference the living wage, rather only the legal minimum wage or standard industry wage. Neither the code of conduct nor the supplier handbook reference freedom of association and right to collective bargaining. These rights are only referenced on-line under the 'Marmot Vendor Compliance Policy.'</p> <p>To aid the implementation of the code of conduct, the company states they finance annual training for all factories, and thereby enable the sharing of best practice. The company claims, that they are considering joining the multi-stakeholder initiative, the Fair Wear Foundation in 2012 or 2013. Becoming a FWF would be a positive step towards effective and transparent corporate responsibility activities and to improving the working conditions in the factories.</p>	
Transparency	
<p>Marmot Mountain Europe has filled in the CCC questionnaire on behalf of Marmot Mountain LLC and has provided additional documents. Marmot's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. There is no social report available. Marmot provides results of factory audits but there are no reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Marmot has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Marmot does not declare that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct does not include all fundamental labour standards and does not make an explicit reference to the ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company does not formally commit to restrictions on the number of working hours per week. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- guaranteeing a living wage during regular working hours without overtime
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into some of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Marmot declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. According to the information given Marmot has no intention to implement the payment of living wages for all workers involved in the supply chain. Marmot has not shown that it is aware of the fact that part of its production sites are located in countries or zones where freedom of association is not guaranteed by law. The company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. Some information about the company monitoring findings is available. Marmot makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Marmot Mountain would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	Lukas Meindl GmbH & Co KG • www.meindl.de
Headquarters	Kirchanschöring
Country	Germany
Founded in	1638
Turn over	n.a.
Profit	n.a.
Total points of sale	n.a.
Owned by	Meindl
Name of CEO	Meindl
Product description	Brand: Meindl Products: Shoes (100% of the turnover)
Countries of production	Vietnam, Germany, Hungary, Italy, Slovenia
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Meindl is a traditional hiking and trekking shoe manufacturer from Germany. The majority of production takes place in Germany or elsewhere in Europe. Meindl maintains long-standing relationships with their suppliers, some for over 15 years. The answers and information provided by Meindl suggests respecting labour rights plays important role in the company.</p> <p>Meindl demonstrates an awareness of the importance of paying the living wage and indicates that wages are higher than the minimum wage in the factories where they produce, because the minimum wage would not be sufficient to meet workers' basic needs. That said, Meindl is not at all transparent in regards to its CSR activities and hasn't even published their code of conduct. Meindl informed the CCC however, that they are planning a new web-presence, which will include publicly available copy of their code of conduct. There is no independent verification of labour standards by a multi-stakeholder initiative in their supply chain. This means the company's statements cannot be verified.</p> <p>A positive step towards effective and transparent corporate responsibility for Meindl would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Meindl has filled in the CCC questionnaire and has provided additional documents. Meindl's code of conduct is not publicly available through internet, shops or other ways. The information given about producer countries and the structure of supply chain is not comprehensive. There is no social report available. Meindl provides results of factory audits but there are no reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Meindl has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Meindl declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). Though the code does not include measures to implement it and monitor labour conditions at the production sites. The code of conduct does not include all fundamental labour standards and does not make an explicit reference to the ILO core conventions. The company is committed to workers' right to earn a wage that meets the basic needs of workers and their families but does not specify that this is within standard working hours. It is therefore not a living wage. The company does not formally commit to restrictions on the number of working hours per week. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- prohibiting the retention by employers of security deposits or identity papers
- payment of overtime at a premium rate
- guaranteeing a living wage during regular working hours without overtime
- prohibiting arbitrary penalties, above all in case of sickness or pregnancy
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into some of the languages of the countries the company is sourcing from. The buying contract does not include the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Meindl. Meindl agrees to pay a living wage in all production sites (suppliers and subcontractors) but has no credible methodology for implementing it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Meindl makes use of corrective action plans when labour rights violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Meindl would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	Meru (Eurofamily) • www.globetrotter.de
Headquarters	Bozen
Country	Italien
Founded in	2000
Turn over	EUR 150 m (2010)
Profit	n.a.
Total points of sale	n.a.
Owned by	Eurofamily
Name of CEO	Christoph Schmid (Eurofamily)
Product description	Brands owned by Eurofamily: Meru, Kaikkialla, HotStuff Products: garment, shoes, bags, sleeping bags, tents, mattresses, accessories
Countries of production	Bangladesh, China (People's Republic of China), India, South Korea (Republic of Korea), Taiwan, Thailand, Vietnam, Europe, Moldova
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>The brand meru belongs to "Eurofamily", a pan-European association of sport & outdoor retailers from Germany, Italy, Austria and Switzerland. The company "Globetrotter Ausruster" is a member of this association and sells the brand meru in its shops. Although the owners of meru formally commit themselves to sustainable production conditions and social standards, their activities in and around implementing the ILO's core labour standards and human rights at work seem to be limited. Fair working conditions are not directly mentioned.</p> <p>A positive step towards effective and transparent corporate responsibility for meru would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Meru has filled in the CCC-questionnaire but has not provided any additional documents. Meru's code of conduct is publicly available through internet, shops or other ways. The information given about producer countries and the structure of supply chain is not comprehensive. A social report is publicly available. Meru provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

Meru has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Meru does not declare that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48 hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- guaranteeing a living wage during regular working hours without overtime

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Meru. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way.

Monitoring and Verification

The company is participating in a business driven monitoring initiative: BSCI. Meru makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Meru would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,175,177 and the ILO recommendations: 35,90,111,168,184).

	NORTHLAND PROFESSIONAL • www.northland-pro.com
Headquarters	Graz
Country	Austria
Founded in	1973
Turn over	n.a.
Profit	n.a.
Total points of sale	n.a.
Owned by	Url Sigrid, Pichler Arno
Name of CEO	Sigrid Url
Product description	Brand: NORTHLAND PROFESSIONAL Products: outdoor garments, shoes, camping-equipment
Countries of production	China (People's Republic of China), India, Turkey, Italy, Spain, Portugal
<p>Comment from CCC</p> <p>As NORTHLAND PROFESSIONAL did not respond to the CCC's questionnaire, the following evaluation of the company's corporate responsibility activity is based solely on previous communication with the company and research carried out by the CCC:</p> <p>The Austria based company NORTHLAND PROFESSIONAL is one of the few outdoor companies that did not return the Clean Clothes Campaign's questionnaire. NORTHLAND PROFESSIONAL only sent over its code of conduct. This is also publicly available on the company's website. The code has a number of shortcomings and yet, the company does commit itself to paying all the workers within their supply chain a living wage. It remains to be seen, however, how exactly the implementation of this is ensured in reality. According to the company, 90% of all their products are produced in factories that are SA 8000 certified. Although no audit reports to back this up were made available to the Clean Clothes Campaign.</p> <p>Since the last survey in 2010, NORTHLAND PROFESSIONAL has released a code of conduct. The company has not followed through on the CCC's recommendation to join an independent monitoring and verification initiative.</p>	
<p>Transparency</p> <p>NORTHLAND PROFESSIONAL did not fill in the CCC-questionnaire. NORTHLAND PROFESSIONAL's code of conduct is publicly available through internet, shops or other ways. The information given about producer countries and the structure of supply chain is not comprehensive. There is no social report available. NORTHLAND PROFESSIONAL provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

NORTHLAND PROFESSIONAL has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. NORTHLAND PROFESSIONAL declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). Though the code does not include measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- special provisions for workers under 18 years of age (e.g. education, no night work)
- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- prohibiting the retention by employers of security deposits or identity papers
- prohibiting arbitrary penalties, above all in case of sickness or pregnancy
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. According to the information given the buying contract does not include the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by NORTHLAND PROFESSIONAL. NORTHLAND PROFESSIONAL agrees to pay a living wage in all production sites (suppliers and subcontractors) but has not shown a credible methodology for implementing it. NORTHLAND PROFESSIONAL has not shown that it is aware of the fact that part of its production sites are located in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no finding of monitoring activities. According to the information given NORTHLAND PROFESSIONAL did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), NORTHLAND PROFESSIONAL would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 182,135,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	Odlo International • www.odlo.com
Headquarters	Hünenberg
Country	Switzerland
Founded in	1946
Turn over	EUR 119,032 m (CHF 144.2 m)
Profit	n.a.
Total points of sale	4.500
Owned by	Privat Equity
Name of CEO	Andreas Kessler
Product description	Brand: ODLO Products: Garment (100% of the turnover)
Countries of production	China (People's Republic of China), India, Israel, Thailand, Vietnam, Germany, Italy, Portugal, Romania

Comment from CCC

The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:

Odlo joined the stakeholder-initiative, Fair Wear Foundation (FWF) in 2008. With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes. The 2011 Social Report and a Brand Performance Check from 2010 are available on the FWF website. These reports provide a high level of transparency with regards to their progress in improving working conditions and the challenges they face in doing so. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Odlo takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families.

Employees in key positions are responsible for coordinating CSR activities and according the FWF, they have a good overview of which aspects of the code are not yet fully implemented. Odlo has longstanding relationships with their suppliers, 70% of which they have been in business with for more than five years.

Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Odlo.

Transparency

Odlo has filled in the CCC questionnaire and has provided additional documents. Odlo's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Odlo provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

Odlo has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Odlo declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Odlo declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. Odlo agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Odlo makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Odlo would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183 and the ILO recommendations: 35,90,146,164,168,184,190).

	Patagonia • www.patagonia.com
Headquarters	Ventura
Country	USA
Founded in	1973
Turn over	EUR 385,355 m (USD 501 m) (May 2011 to April 2012)
Profit	n.a.
Total points of sale	n.a.
Owned by	Yvon and Malinda Chouinard
Name of CEO	Casey Sheahan
Product description	Brands: Patagonia, FCD Products: Garment (90 % of the turnover), Shoes (5 % of the turnover), Bags (5 % of the turnover)
Countries of production	Colombia, Costa Rica, El Salvador, Mexico, Nicaragua, USA, Bangladesh, China (People's Republic of China), India, Israel, South Korea (Republic of Korea), Philippines, Sri Lanka, Thailand, Turkey, Vietnam
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:</p> <p>Patagonia is a California-based company that was set up by Yvon Chouinard in 1973. Yvon Chouinard had been selling climbing equipment since 1964 and decided to expand his product line to include clothing (mainly for climbers) with the introduction of Patagonia. Where cotton is concerned, Patagonia has only used organic cotton since 1996. They produce mainly clothing (95%) and bags.</p> <p>Patagonia provided extensive information on the labour and social standards in their supply chain and also made their list of suppliers available online. With their online tool 'Footprint chronicles', Patagonia has made it possible for consumers to track their products back to the supplier.</p> <p>As of Autumn 2012 Patagonia will have started working to a newly revised code of conduct. This profile is based of the old code of conduct, that was still in use during the questioning. However, there are several positive changes in the new code that are worth a mention. One of them is the step towards paying the living wage, stating 'every worker has the right to compensation for a regular work week that is sufficient to meet the worker's and their family's basic needs and provide some discretionary income.'</p> <p>Among other positive changes is the increased focus on setting limits on working hours and implementing grievance mechanisms. The freedom of association and collective bargaining, particularity with regards to wage negotiations have been placed centre stage.</p> <p>Patagonia is a member of several initiatives in relation to its social corporate responsibility work, such as FLA, Fair Factories Clearinghouse and Better Work ILO Programme, among others.</p>	
<p>Transparency</p> <p>Patagonia has filled in the CCC questionnaire and has provided additional documents. Patagonia's code of conduct is publicly available through internet, shops or other ways. Patagonia provides information about the sourcing structure, producing countries and production sites. There is no social report available. Patagonia provides results of factory audits and there are reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

Patagonia has adopted a labour code of conduct. The code does not indicate that where local and international standards are at variance the higher standard should prevail. Patagonia declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime) but it allows exceptions of working weeks with more than that. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- guaranteeing a living wage during regular working hours without overtime
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Patagonia declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Patagonia makes use of corrective action plans when labour rights violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Labor Association (FLA). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Patagonia would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177, 183 and the ILO recommendations: 143,35,90, 111,146,164,168,184,190).

	Quechua • www.quechua.com
Headquarters	Domancy
Country	France
Founded in	1997
Turn over	n.a.
Profit	n.a.
Total points of sale	n.a.
Owned by	n.a.
Name of CEO	Christian Ollier
Product description	Products: garment, shoes, outdoor-equipment
Countries of production	n.a.
<p>Comment from CCC</p> <p>As Quechua did not respond to the CCC's questionnaire, the following evaluation of the company's corporate responsibility activity is based solely on research carried out by the CCC:</p> <p>Quechua is one of the few outdoor companies that did not respond to the Clean Clothes Campaign's questionnaire. It is not known whether the company requires its suppliers to comply with social standards in accordance with international labour law. Quechua is not involved in independent monitoring and verification processes to monitor compliance with minimum labour standards.</p> <p>A positive step towards effective and transparent corporate responsibility for Quechua would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>Quechua did not fill in the CCC-questionnaire. Quechua's code of conduct is not publicly available through internet, shops or other ways. No information on sourcing structure, producing countries and suppliers is available. There is no social report available. Quechua provides neither the results of factory audits nor are MSI verification reports available.</p>	
<p>Formal commitment to labour standards</p> <p>Quechua doesn't commit in a public document to respect the Universal Declaration of Human Rights and the national law. The company is neither publicly committed to wages in accordance with living wage principles nor with legal minimum wage legislation. According to the information given the company does not commit to restrictions on the number of working hours per week and does not call in a public document for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers.*</p>	
<p>Code implementation and purchasing practices</p> <p>It is unclear, if the buying contract includes the obligation for the suppliers and all their subcontractors to comply with a code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Quechua. According to the information given Quechua has no intention to implement the payment of living wages for all workers involved in the supply chain. We are afraid, that the company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way. According to the information given there are no provisions to give buyers positive incentives in order to take working conditions in the factories into account and give preference the productions sites with good labour conditions to place orders. Quechua did not provide any information on measures that show how to improve planning and prevent excessive overtime.</p>	

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Quechua did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Quechua would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	Salewa • www.salewa.com
Headquarters	Bozen
Country	Italy
Founded in	1935
Turn over	EUR 175 m
Profit	n.a.
Total points of sale	appr. 500
Owned by	OberAlp AG Heiner Oberrauch
Name of CEO	Massimo Baratto
Product description	Products: garment (47% of the turnover) shoes (11% of the turnover) bags (5% of the turnover) sleeping bags (1,5% of the turnover)
Countries of production	China (People's Republic of China), Vietnam, Indonesia, Turkey, Bangladesh, Burma (Myanmar), Austria, Germany, Greece, Italy, Lithuania

Comment from CCC

The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:

The South Tyrolean mountain sports outfitter, Salewa, is owned by the Oberrauch family and has been on the scene since 1935. In comparison to the last survey in 2010, the company has shown itself to be more transparent. For example, customers can now have a look at the company's code of conduct on their website, which was not possible two years ago. However, some of the other criticisms from 2010 still stand – there are still important issues that the code of conduct does not reference. The company has announced that they will revise their social standards in the next year and start to work on paying the living wage.

From the Clean Clothes Campaign point of view the strategies aiming to implement social standards in their supply-chains must be improved. According to the company, an in-house working group with representatives from different departments was set up to improve the integration of social responsibility into their work. The company currently carries out checks on the suppliers internally. Salewa has honed the monitoring process to suit their own needs and has revised the reporting format to improve intelligibility and comparability of auditing activities. But the results of these audits remain internal. This criticism could be void, if Salewa became a member of the multi-stakeholder initiative Fair Wear Foundation (FWF), which the company is considering at the moment. Therefore Salewa would have a competent partner for the implementation and monitoring of social standards at their side.

Transparency

Salewa has filled in the CCC questionnaire and has provided additional documents. Salewa's code of conduct is publicly available through internet, shops or other ways. Salewa provides information about the sourcing structure and producing countries. A social report is publicly available. Salewa provides neither the results of factory audits nor are MSI verification reports available.

Formal commitment to labour standards

Salewa has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Salewa declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). Though the code does not include measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime) but it allows exceptions of working weeks with more than that. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- special provisions for workers under 18 years of age (e.g. education, no night work)
- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- prohibiting the retention by employers of security deposits or identity papers
- guaranteeing a living wage during regular working hours without overtime
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Salewa. Salewa has not shown that it is aware of the fact that part of its production sites are located in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. Salewa makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Salewa would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175,177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190).

	Schöffel Sportbekleidung • www.schoeffel.com
Headquarters	Schwabmünchen
Country	Germany
Founded in	1804
Turn over	EUR 93,5 m
Profit	n.a.
Total points of sale	appr. 2.400
Owned by	Hubert Schöffel and Peter Schöffe
Name of CEO	Peter Schöffel
Product description	Brands: Schöffel, Schöffel Professional Wear, Schöffel Country Wear Products: Garment (100% of turnover)
Countries of production	China (People's Republic of China), Indonesia, Turkey, Vietnam, Bulgaria, Germany, Hungary, Italy, Latvia, Poland, Romania, Serbia

Comment from CCC

The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:

Schöffel is a traditional family run enterprise that has been around for at least 200 years. The company produces functional sportswear. Schöffel has been a member of the multi-stakeholder initiative, Fair Wear Foundation (FWF) since the beginning of 2011. With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes.

Schöffel's 2011 Social Report as well as a 'Brand Performance Check' from 2012 are available on the FWF website. These reports provide a high level of transparency with regards to their progress in improving working conditions and the challenges they face in doing so. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Schöffel takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families. The FWF states that Schöffel meets all their management system requirements and what's more, goes above and beyond several of them.

Three audits carried out by FWF teams at Schöffel's factories in 2011 found that wages met local minimum standards but were below what would amount to a living wage as estimated by local stakeholders.

Schöffel has proactively approached brands that use the same suppliers to organise shared audits and, where necessary, corrective action plans. Schöffel exchanged detailed information about the follow-up process with other the brands, setting a very positive example.

Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Schöffel.

Transparency

Schöffel has filled in the CCC questionnaire and has provided additional documents. Schöffel's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. Schöffel provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

Schöffel has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Schöffel declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. Schöffel declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. Schöffel agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. According to the information available, some of the production sites are in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

Schöffel makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Schöffel would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183 and the ILO recommendations: 35,90,146,164,168,184,190).

	SEVEN SUMMITS • www.sevensummits-sports.com
Headquarters	Wels
Country	Austria
Founded in	2007
Turn over	n.a.
Profit	n.a.
Total points of sale	n.a.
Owned by	SPORT EYBL & SPORTS EXPERTS AG
Name of CEO	Wahle Peter, Frischknecht Rolf (management board Sport Eybl & Sports Experts AG)
Product description	Brands of SPORT EYBL & SPORTS EXPERTS AG: SEVEN SUMMITS, Noric, Take Off Products: garment, outdoor-equipment
Countries of production	n.a.
<p>Comment from CCC</p> <p>As SEVEN SUMMITS did not respond to the CCC's questionnaire, the following evaluation of the company's corporate responsibility activity is based solely on research carried out by the CCC:</p> <p>The sportswear chains Intersport Eybl and Sports Experts sell their outdoor products under the brand SEVEN SUMMITS.</p> <p>It is not known whether the company requires its suppliers to comply with social standards in accordance with international labour law. SEVEN SUMMITS is not involved in independent monitoring and verification processes to monitor compliance with minimum labour standards.</p> <p>A positive step towards effective and transparent corporate responsibility for SEVEN SUMMITS would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>SEVEN SUMMITS did not fill in the CCC-questionnaire. SEVEN SUMMITS's code of conduct is not publicly available through internet, shops or other ways. No information on sourcing structure, producing countries and suppliers is available. There is no social report available. SEVEN SUMMITS provides neither the results of factory audits nor are MSI verification reports available.</p>	
<p>Formal commitment to labour standards</p> <p>SEVEN SUMMITS doesn't commit in a public document to respect the Universal Declaration of Human Rights and the national law. The company is neither publicly committed to wages in accordance with living wage principles nor with legal minimum wage legislation. According to the information given the company does not commit to restrictions on the number of working hours per week and does not call in a public document for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers.*</p>	

Code implementation and purchasing practices

It is unclear, if the buying contract includes the obligation for the suppliers and all their subcontractors to comply with a code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by SEVEN SUMMITS. According to the information given SEVEN SUMMITS has no intention to implement the payment of living wages for all workers involved in the supply chain. We are afraid, that the company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way. According to the information given there are no provisions to give buyers positive incentives in order to take working conditions in the factories into account and give preference the productions sites with good labour conditions to place orders. SEVEN SUMMITS did not provide any information on measures that show how to improve planning and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no findings of monitoring activities. SEVEN SUMMITS did not provide any information on corrective steps for the remediation of labour rights violations in its supply chain. The company is not involved in independent verification through a multi-stakeholder initiative.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), SEVEN SUMMITS would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175, 177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	Tatonka GmbH • www.tatonka.com
Headquarters	Dasing
Country	Germany
Founded in	1981
Turn over	n.a.
Profit	EUR 632.660,10 (October 2010 to September 2011)
Total points of sale	Germany: ca. 300 Outdoor stores, ca. 300 Intersport stores, ca. 150 Sport2000 stores, ca. 50 Karstadt stores, ca. 130 others stores
Owned by	Winfried and Andreas Schechinger
Name of CEO	Andreas Schechinger
Product description	Brand: TATONKA; Products: Garment (12% of the turnover), Shoes (0% of the turnover), Bags / Backpacks (68% of the turnover) Stainless Steel Cookware (3% of the turnover), Travel Accessories (10% of the turnover), Tents (7% of the turnover)
Countries of production	Vietnam
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on an additional desk study conducted by the CCC:</p> <p>In 1981 Tatonka GmbH was founded. It is family-run. Tatonka is one of the few outdoor companies that own a production facility - Mountech Ltd. - in Vietnam. Tatonka sells about 2.000 outdoor and leisure products in 4.000 shops around the world.</p> <p>Since the last enquiry in 2010 Tatonka became more transparent. Tatonka has elaborated a code of conduct and the production site in Vietnam was SA8000 certified. An additional CSR-activity is the Open Factory' Programme.</p> <p>A critical aspect stays that the Tatonka did not put the issue living wage for workers in its supply chain, one of the core demands of the CCC, on its agenda.</p> <p>An effective and transparent commitment to corporate responsibility would be Tatonkas accession to a credible multi-stakeholder initiative, which provides the payment of a living wage.</p>	
<p>Transparency</p> <p>Tatonka has filled in the CCC questionnaire and has provided additional documents. Tatonka's code of conduct is not publicly available through internet, shops or other ways. Tatonka provides information about the sourcing structure, producing countries and production sites. A social report is publicly available. Tatonka provides neither the results of factory audits nor are MSI verification reports available.</p>	

Formal commitment to labour standards

Tatonka has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. Tatonka declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- guaranteeing a living wage during regular working hours without overtime

Code implementation and purchasing practices

The code of conduct is translated into the languages of the country the company is sourcing from. The buying contract does not include the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by Tatonka. According to the information given Tatonka has no intention to implement the payment of living wages for all workers involved in the supply chain. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

The company is not participating in a business driven monitoring initiative. The company provides no finding of monitoring activities. Tatonka makes use of corrective action plans when labour rights' violations are detected. The company is not involved in independent verification through a multi-stakeholder initiative, but the factory in Vietnam is SA 8000 certified.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), Tatonka would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,175,177 and the ILO recommendations: 35,168).

	The North Face • www.thenorthface.com
Headquarters	San Leandro
Country	USA
Founded in	1968
Turn over	EUR 3,509.0 m (USD 4,562.0 m)
Profit	n.a.
Total points of sale	431
Owned by	VF Corporation
Name of CEO	Todd Spaletto (President The North Face Americas)
Product description	Products: garment, outdoor-equipment, shoes
Countries of production	n.a.
<p>Comment from CCC</p> <p>The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on an additional research conducted by the CCC:</p> <p>The brand The North Face belongs to VF Corporation. This corporation also owns brands such as Timberland, Eastpak and JanSport. The code of conduct is publicly available to, but the company did not provide any information about the structure of the production chain. The production countries are not known. There are a number of shortcomings in the code of conduct.</p> <p>One criticism is that the company does not, as of yet, plan to implement the living wage. The owner of The North Face, VF Corporation, is a so-called 'B-Member' of the monitoring initiative Fair Labor Association (FLA). This means the company commits itself to monitoring only part of their supply chain in accordance with the FLA requirements.</p> <p>A positive step towards effective and transparent corporate responsibility for The North Face would be for them to become member of a credible multi-stakeholder initiative, one that stipulates the paying of a living wage.</p>	
<p>Transparency</p> <p>The North Face has filled in the CCC questionnaire and has provided additional documents. The North Face's code of conduct is publicly available through internet, shops or other ways. No information on sourcing structure, producing countries and suppliers is available. A social report is publicly available. The North Face provides results of factory audits and there are reports with results of verification through a MSI available.</p>	

Formal commitment to labour standards

The North Face has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. The North Face declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards, but does not explicitly refer to all ILO core conventions. The company is only committed to paying the legal minimum wage or industry standard, i.e. not a living wage. The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company does not explicitly require a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- specific steps to encourage decent working conditions in countries where freedom of association and collective bargaining are restricted by law
- prohibiting the retention by employers of security deposits or identity papers
- guaranteeing a living wage during regular working hours without overtime
- ending the worst forms of child labour with explicit reference to ILO core-convention 182

Code implementation and purchasing practices

The code of conduct is translated into most of the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. There is no credible evidence that training on labour rights issues for management or workers is provided or promoted by The North Face. According to the information given The North Face has no intention to implement the payment of living wages for all workers involved in the supply chain. The company fails to take into account the negative impact of its own purchasing practices on working conditions in a comprehensive way.

Monitoring and Verification

The company is participating in a business driven monitoring initiative: WRAP. The North Face makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Labor Association (FLA) - B member.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), The North Face would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 138,182,87,98,135,100,111,29,105,1,81,122,131,154,155,159,175, 177,183 and the ILO recommendations: 143,35,90,111,146,164,168,184,190.

	VAUDE Sport GmbH & Co KG • www.vaude.com
Headquarters	Tettnang
Country	Germany
Founded in	1974
Turn over	n.a.
Profit	n.a.
Total points of sale	appr. 5.000
Owned by	Von Dewitz Family
Name of CEO	Antje von Dewitz
Product description	Brands: VAUDE, Edelrid Products: Garment (53% of the turnover), Shoes (3% of the turnover), Bags (32% of the turnover), Sleeping bags (2% of the turnover), Tents (6% of the turnover), Camping Equipment (4% of the turnover)
Countries of production	Tunisia, Burma (Myanmar), China (People's Republic of China), South Korea (Republic of Korea), Vietnam, Austria, Bulgaria, Germany, Lithuania

Comment from CCC

The following evaluation of the company's performance in terms of transparency, code implementation and monitoring of labour standards is based on the company's response to the questionnaire from the CCC and on additional research conducted by the CCC:

Vaude was founded in 1974 as a family-run enterprise. Today the company operates on a global scale with multiple suppliers and production units. In November 2010 the company became a member of the multi-stakeholder initiative, Fair Wear Foundation (FWF). With the membership comes a wide-reaching commitment to improve working conditions in the factories. This includes working with local NGOs and trade unions to carry out checks in the factories, as well as a regular review of brand's own management processes.

Vaude's 2012 Sustainability Report as well as a 'Brand Performance Check' from 2012 are available on the FWF website. These reports provide a high level of transparency with regards to their progress in improving working conditions and the challenges they face in doing so. During verification any tangible improvements in the factories are recorded and checked to ascertain whether actions taken by the brand and the factory are, in reality, having the desired effect. Vaude takes on a large chunk of the responsibility for implementing the directives and doesn't just pass the buck to the suppliers. It is also emphasized that the company commits itself to paying the living wage. This is a prerequisite to enabling workers to lead a decent life and fend for themselves and their families.

Employees in key positions are in charge of coordinating CSR-activities. FWF acknowledges Vaude has a constructive approach to implementing their code of conduct and the other obligations the FWF members have. FWF are particularly positive about Vaude's step by step approach to improvements along the supply chain; taking tangible and strategic actions to reach goals set after audits.

Of note here; a further positive development that came to light after the CCC survey was carried out - namely FWF publishing their new child labour policy in October 2012. The document lays out the steps to take, should the use of child labour be discovered in the supply chain. The guideline applies to all FWF-member companies and therefore also to Vaude.

Transparency

VAUDE has filled in the CCC questionnaire and has provided additional documents. VAUDE's code of conduct is publicly available through internet, shops or other ways. Some information is available about producer countries and the structure of the supply chain. A social report is publicly available. VAUDE provides results of factory audits and there are reports with results of verification through a MSI available.

Formal commitment to labour standards

VAUDE has adopted a labour code of conduct. The code indicates that where local and international standards are at variance the higher standard should prevail. VAUDE declares that it is responsible for the implementation of the code of conduct in the whole supply chain (including suppliers and subcontractors). The code of conduct includes measures to implement it and monitor labour conditions at the production sites. The company is formally committed to respecting fundamental labour standards in accordance with ILO core conventions throughout the supply chain. The company is committed to workers' right to earn a living wage (i.e. a wage for standard working hours that meets the basic needs of workers and their families and provides some discretionary income). The company's code of conduct states that working hours are restricted to 60 hours per week (48hours plus 12h of overtime). Overtime may only occur occasionally and it is paid at a premium rate. The company's code of conduct calls for a safe and hygienic working environment in the production sites. The company requires the establishment of a formal employment relationship for all workers. Beyond the labour standards mentioned above, the company code is not precise enough on some specific issues. It does not state its commitment in relation to*:

- The provision of transitional measures that will be in the interest of the child and of her/his family where child labour is found
- prohibiting the retention by employers of security deposits or identity papers

Code implementation and purchasing practices

The code of conduct is translated into all the languages of the countries the company is sourcing from. Every buying contract includes the obligation for the suppliers and all their subcontractors to comply with the code. VAUDE declares to organise or promote training on some labour rights issues for some of the management and workers at different levels of the supply chain. VAUDE agrees to pay a living wage in all production sites (suppliers and subcontractors) and has developed a credible methodology for calculating it. VAUDE has not shown that it is aware of the fact that part of its production sites are located in countries or zones where freedom of association is not guaranteed by law. The company takes, to some extent, the impact of its own purchasing practices into account. It has established some procedures to adapt planning to the production capacity and prevent excessive overtime.

Monitoring and Verification

VAUDE makes use of corrective action plans when labour rights' violations are detected. The company is involved in the multi-stakeholder verification initiative coordinated by Fair Wear Foundation (FWF). The monitoring and/or verification process includes consultation of local stakeholders from the civil society.

* To comply with recent developments in internationally-recognised labour standards (see code under: www.jo-in.org), VAUDE would need to update and improve some additional important labour rights issues (they should formally recognise the following ILO conventions: 81,122,159,175,177,183 and the ILO recommendations: 35,90,146,164,168, 184,190).

8. Imprint

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