



Brand Performance Check

ALBIRO AG

Publication date: August 2025

This report covers the evaluation period 01-01-2024 to 31-12-2024

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 188

Possible score: 206

Benchmarking Score: 91

Performance Benchmarking Category: Leader



Foundational
system's criteria

100%



Sourcing strategy

100%



Identifying
continuous human
rights risks

100%



Responsible
purchasing
practices

85%



Quality and
coherence of
prevention and
remediation system

100%



Improvement and
prevention

83%



Communication,
transparency and
evaluation

85%

Summary:

ALBIRO has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 91, the member is placed in Leader category.

This performance check report includes ALBIRO's financial years 2023 and 2024.

ALBIRO's sourcing strategy is promoting consolidation, with 86% of production volume sourced from suppliers where it holds at least 10% leverage. The brand maintains long-term relationships with 96% of its suppliers and embeds cooperation with other clients into its sourcing strategy. ALBIRO's sourcing strategy does mention a preference for countries where workers can freely form or join a trade union and bargain collectively. ALBIRO conducts advanced, systematic risk scoping across all tiers of its supply chain, integrating gender and freedom of association (FoA) lenses. Risk assessments are updated regularly and include input from workers and stakeholders. The brand prioritises countries where workers can freely organise and has embedded FoA and gender considerations into its sourcing decisions. ALBIRO demonstrates responsible purchasing practices, including collaborative planning, fair payment terms, and integration of CSR into decision-making. However, its supplier contracts still lack clauses on shared responsibility for human rights due diligence and do not include a responsible exit strategy. The brand is advised to align its contracts with the Common Framework of Responsible Purchasing Practices.

ALBIRO has developed tailored action plans for all suppliers, integrating gender and FoA considerations. These plans are informed by risk assessments and include budgets and timelines. The brand supports factory-level grievance mechanisms and collaborates with other brands on joint remediation efforts. The brand also resumed a living wage project and developed a time-bound plan to increase wages across its supply chain. Currently, 15% of its production volume supports the payment of a target towards living wage estimates. Training is a key component of ALBIRO's strategy. In 2024, the brand implemented and followed up on multiple training programmes, embedding outcomes into its prevention plans. It also intensified efforts in social dialogue, advocating for internal training and regular exchanges between workers and management.

ALBIRO actively communicates about its Fair Wear membership and publishes its social report, including factory-level data. While it collects some information on external brands' due diligence systems, this does not yet influence its selection process. The brand has a system to track implementation and validate results, involving top management and triangulated feedback. However, it has not yet fully addressed all requirements from the previous performance check, particularly regarding shared responsibility in contracts.

Performance Category Overview

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

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

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

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

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

Company Profile ALBIRO AG

Member company information

Member since: [1 Jan 2012](#)

Product types: [Outdoor products, Workwear and Outdoorwear](#)

Percentage of turnover of external brands resold [2%](#)

Member of other MSI's/Organisations [Amfori - BSCI, Summations, OEKOTEX, SGS Certification and Women Empowerment Principles](#)

Number of grievances received last financial year [2](#)

Basic requirements

Definitive production location data has been submitted for the financial year under review? [Yes](#)

Projected production location data have been submitted for the current financial year? [Yes](#)

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

Production Country	Number of production locations	Percentage of production volume
North Macedonia	4	59.33%
Morocco	1	16.42%
Bosnia and Herzegovina	2	9.62%
Türkiye	3	9.49%
Slovakia	1	2.47%
Bulgaria	1	0.94%
Serbia	1	0.9%
Switzerland	5	0.63%
India	1	0.19%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

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

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

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

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

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

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

Comment: [ALBIRO discloses 100% of production locations internally through Fair Wear's information management system.](#)

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

Comment: ALBIRO discloses 100% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 86

Indicators on Sourcing strategy

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

Comment: ALBIRO has a sourcing strategy that actively addresses the improvement of labour conditions. The member currently works with 19 active suppliers, with 86% of its production volume sourced from suppliers where it holds at least 10% leverage. Only 4% of the production volume is sourced from suppliers where ALBIRO purchases less than 2% of its total FOB, marking an improvement compared to the previous Brand Performance Check in 2023. The strategy explicitly focuses on increasing influence through consolidation and cooperation with other clients. ALBIRO has embedded cooperation with other brands into its strategic sourcing framework. Each collaborative project is guided by a tailored strategic plan.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Advanced	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	6	6	0

Comment: ALBIRO has a sourcing strategy that focuses on maintaining long-term relationships. 96% of the member's total FOB volume comes from suppliers with whom ALBIRO has a business relationship for at least five years. The member commits to long-term contracts with most of its suppliers. These range between 3 and 6 years. The long-term contracts are embedded in ALBIROs sourcing strategy, ensuring they are implemented across its supplier base.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Advanced	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	6	6	-2

Comment: ALBIRO conducts systematic risk scoping in line with the OECD requirements, including all relevant risk factors. The member assesses risks at the country, sector, business model, sourcing model, and product levels. ALBIRO systematically assessed human rights risks across its supply chain, and updated these assessments in 2023 and 2024 regularly. The risk scoping includes a gender lens. Separate analyses have been developed to specifically address gender-related risks and risks related to freedom of association (FoA). The member particularly considers how country risks may differently impact women compared to men. Input from workers, suppliers, and stakeholders is included in the risk scoping by sharing the human rights risk analysis with worker representatives and collecting their feedback through interviews, with interpreters where needed. External resources, like news updates and country reports are also increasingly used to inform the risk scoping.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding supplier selection and country prioritisation. ALBIRO's sourcing strategy privileges countries where workers can freely form or join a trade union and/or bargain collectively. This commitment led to a strategic decision to significantly reduce its presence in the Asian market, specifically excluding China due to the lack of freedom of association.

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

Comment: It is the standard process for ALBIRO to inform new suppliers about its HRDD policy and Fair Wear membership by sending relevant documentation and engaging in dialogue with factory management about Fair Wear requirements before finalising the first purchase order. This process has been followed for all new suppliers added last year. The procedure is documented in ALBIRO's internal system and forms part of its purchasing strategy. Before a supplier is approved, a range of documents are requested to be signed and include its code of conduct for suppliers, zero tolerance policies on informal employment, child labour and forced labour, as well as policies on overtime, subcontractors and migrant workers. Additionally, before a company can be included in the supplier list, a visit to the production facility is conducted by the production manager, the agent, or the corporate social responsibility (CSR) manager. This includes a health & safety check, photographic documentation, and discussions with both management and workers' representatives. In 2024, ALBIRO added a new supplier. The intermediary also visited the factory in 2024 to support the onboarding process.

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

Comment: ALBIRO collects human rights information of potential new suppliers by collecting self-assessments, existing audit reports, organising Fair Wear audits and worker interviews or anonymous worker surveys. Before being added to ALBIRO's supplier list, a site visit is carried out by the production manager, agent, or CSR manager, including discussions with management and worker representatives. The findings are reviewed in a joint risk assessment by the purchasing, production, and sustainability teams. If approved, the Supplier Checklist is completed, the supplier is registered in its supplier management system, and a sample order is placed. A formal agreement follows if the order is successful. Since 2023, ALBIRO has strengthened its sourcing strategy by involving stakeholders and employees, introducing grievance mechanisms, and prioritising suppliers that respect freedom of association and collective bargaining. In 2024, ALBIRO began onboarding a supplier in India using this updated approach. The process included stakeholder engagement, consultation with another brand sourcing from the same site, and an employee survey conducted by an intermediary. ALBIRO's sourcing decisions are guided by input from workers and stakeholders and favour suppliers that uphold trade union rights.

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

Comment: ALBIRO has added two new supplier in the previous two years. ALBIRO has shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The Worker Information Sheet has been posted. ALBIRO organised onboarding sessions for workers and the management of new suppliers. The member organised these sessions to raise awareness about the Fair Wear CoLP and the grievance mechanism.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Advanced	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	6	6	0

Comment: ALBIRO has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the appropriate tools and monitoring frequency based on the outcomes of its risk scoping. For instance, the brand monitors suppliers in countries identified as higher risk, such as those with limited freedom of association, by enrolling them in audits, conducting monitoring visits, sharing FoA checklists, and engaging directly with worker representatives, including with interpreters where needed. Since 2022, ALBIRO has transitioned from using an Excel-based risk identification tool to the Fair Wear Member Hub. Its assessments are informed by audit reports and CAPs, training reports, prevention programme follow-ups, production visit minutes, health & safety checks, stakeholder input, and regular supplier surveys on social dialogue and gender. Discussions with worker representatives have been a standard part of CSR visits since 2023. Risk assessments are reviewed every 6 to 12 months, or sooner if production changes occur, and are evaluated based on likelihood and severity. While ALBIRO uses a range of monitoring tools, it considers audits essential to verify the effectiveness of remediation actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process includes an assessment of freedom of association (FoA).	Advanced	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	6	6	0

Comment: ALBIRO has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The brand uses a combination of monitoring tools, including country-level data, supplier assessments, and ongoing dialogue with factory management, worker representatives, and local stakeholders to identify and evaluate risks. FoA and the right to collective bargaining are core principles embedded in ALBIRO's Code of Conduct for suppliers and its purchasing strategy since 2024. A comprehensive supplier survey conducted in 2023 formed the basis for on-site discussions with suppliers and employee representatives. This, combined with external sources, enabled ALBIRO to classify risks at both country and factory levels. The presence of freely elected worker representatives has been verified in all production facilities, with particularly strong union engagement in North Macedonia.

In countries such as Bosnia and Herzegovina, Bulgaria, India, Morocco, and North Macedonia, moderate risks are primarily linked to the absence of trade unions and collective bargaining agreements (CBAs), limited or no regular meetings between worker representatives and management, and a general lack of awareness among workers about the roles and responsibilities of their representatives. While policies are often in place and intimidation is not reported, the lack of structured dialogue and formal representation mechanisms remains a concern. North Macedonia shows some variation across suppliers: while some facilities report regular meetings and knowledge of representative roles, others still lack trade union presence and CBAs, relying instead on informal agreements. In Serbia, the situation is more positive, with trade unions, CBAs, and regular meetings in place, resulting in a low risk classification. Similarly, Slovakia, Türkiye, and Switzerland are also considered low risk, with structured policies, worker representation, and regular engagement between workers and management.

In response to these findings, ALBIRO has prioritised strengthening social dialogue through expanded training programmes and continued engagement with management. As part of its prevention action plan, the brand has also ensured that partner companies have their own FoA guidelines in place, with employees trained accordingly.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, to foster a better understanding of gendered implications.	Advanced	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	6	6	0

Comment: ALBIRO has included gender in its human rights risk identification. The member has demonstrated a strong understanding of gender-related risks across its sourcing countries. For instance, it identified limited access to equal opportunities, lack of anti-discrimination policies, and insufficient training on gender sensitivity as key risks in countries such as India, Morocco, and Turkey, where gender inequality indices and legal protections for women are notably weaker. Additionally, ALBIRO actively collects gender-disaggregated data at the factory level. This includes information on job roles, salary levels, representation, and perceptions of equality and respect in the workplace. The data is gathered through a combination of tools such as worker and management surveys, employee interviews, audit reports, gender lens assessments, and training evaluations.

Since 2022, ALBIRO has analysed this data at both factory and country levels. The main conclusions so far indicate that while many facilities report no discrimination and general belief in equality, gaps remain in policy implementation, training, and awareness, particularly in high-risk countries. For example, in some North Macedonian facilities, a significant percentage of workers reported not being treated with respect or having equal opportunities.

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

Comment: ALBIRO has a strong and systematic evaluation system for assessing suppliers' human rights performance. This system is embedded in its internal "IMPROVE" platform and evaluates suppliers across four key parameters: quality, on-time delivery, compliance with agreements, and corporate social responsibility (CSR). The CSR component includes progress on corrective action plans, communication, wage practices, and collaboration on improving working conditions. Each supplier receives a rating, and the results are shared at the end of the year with both the supplier and their worker representatives.

Since 2024, the outcome of this evaluation has been directly integrated into ALBIRO's purchasing decisions. Suppliers with strong performance are considered for strategic partnerships and may receive stable or increased order volumes. Those with lower performance are prioritised for closer engagement by the CSR and purchasing teams, including more frequent communication and on-site visits.

For example, in 2024, ALBIRO continued its collaboration with a supplier that had demonstrated consistent progress, selecting them to pilot a new living wage initiative. This reflects ALBIRO's approach of aligning sourcing decisions with supplier performance on human rights and sustainability commitments.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Advanced	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	4	4	0

Comment: ALBIRO uses the outcomes of its human rights monitoring to address and prevent unauthorised subcontracting. The highest risk has been identified in Türkiye and India, where subcontracting is considered a business model risk due to less frequent visits by ALBIRO staff. To mitigate this, ALBIRO has established a clear framework of contracts and guidelines that all suppliers are required to sign. This includes the business contract, supplier code of conduct, subcontractor policy, and the Fair Wear questionnaire, which requires full disclosure of any subcontractors.

For its main suppliers, accounting for 86% of total sales, ALBIRO prepares production planning in close coordination with the production sites. Materials are delivered and finished goods collected on pre-agreed dates using ALBIRO's own logistics. These suppliers are visited several times a year by ALBIRO's head of production, CSR manager, and technical staff. During these visits, sewing lines are inspected to ensure that no unauthorised subcontracting is taking place. Quality control processes are also used to detect any irregularities that might indicate subcontracting.

In countries where direct visits are less feasible, such as Bulgaria and India, ALBIRO works with intermediaries who conduct on-site checks and monitor order fulfilment. While no missing first-tier locations have been identified in ALBIRO's database, the company continues to treat fully these suppliers with similar scrutiny.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Advanced	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	4	4	0

Comment: Since 2023, ALBIRO has included the topic of homeworking in its Supplier Code of Conduct. The policy requires suppliers to inform ALBIRO if homeworkers are used and ensures that such workers are entitled to the same rights as on-site employees, including contracts, minimum wage, and social security benefits. ALBIRO has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because it manufactures workwear, which typically involves production steps that are not easily outsourced to home-based settings. The only step that could potentially be carried out by homeworkers is trimming sewing threads. To assess this risk, ALBIRO conducted a risk assessment at product, country, and production levels. In contrast, ALBIRO's production processes are largely industrial and centralised. To verify this, ALBIRO reviewed each production facility to ensure that workers are employed in the Quality Control and Cutting departments. These roles were confirmed through audits and wage data sheets, which showed that the relevant staff are employed under formal contracts.

To date, no supplier has reported the use of homeworkers. ALBIRO's regular site visits and detailed knowledge of production processes support these declarations. If a supplier were to engage homeworkers, they would be required to notify ALBIRO, and the production department would be responsible for ensuring compliance with all applicable labour standards.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Intermediate	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	2	4	0

Comment: ALBIRO does use contracts with its suppliers. The member has agreements in the form of contracts that stipulate terms of payment, liability, and penalties. Payment terms are 30% upon order placement and the remaining balance within two weeks of delivery. These contracts partially support the implementation of human rights due diligence. While they reference ALBIRO's commitments to Fair Wear and audit obligations, they do not include a shared responsibility for identifying, preventing, and remediating human rights risks. There is also no clause committing ALBIRO to support suppliers in meeting these obligations, for example, through training or capacity building, and no mention of positive incentives for strong human rights performance (while this in practice is the case, see 2.10).

An unequal burden is placed on suppliers by holding them financially responsible for defects or delays without requiring proof of fault. Although contractual penalties for late delivery are not enforced in practice, the contract does allow ALBIRO to apply discounts in such cases. Furthermore, the contracts lack provisions for collaborative handling of order changes or a responsible exit strategy that considers the impact on workers.

There is also no indication that suppliers were involved in negotiating the terms, nor are labour costs ringfenced to protect wages during price discussions. While production volumes are defined, stronger commitments to collaborative forecasting and planning would help mitigate risks of underutilisation or last-minute changes.

Requirement: ALBIRO should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

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

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

Comment: ALBIRO actively shares relevant CSR information with other departments. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. A monthly exchange takes place between the CSR manager, head of production, head of purchasing, head of sales, and both CEOs. In urgent cases, communication occurs more frequently. Sustainability is embedded in the business structure, with the CSR manager reporting directly to the CEO. The member includes responsible business practices in job role competencies. For instance, sourcing staff are expected to work only with suppliers who are willing and able to meet Fair Wear requirements, a responsibility that is formally included in their role expectations. Sourcing and purchasing department work with KPIs that support responsible sourcing and pricing strategies. These KPIs include collaboration on corrective action plans, communication quality, wage practices, and commitment to improving working conditions. This structured approach ensures that CSR considerations are integrated into daily operations and decision-making.

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

Comment: ALBIRO has a structured and collaborative production planning system that integrates supplier capacity, internal coordination, and risk mitigation. Weekly meetings between sales, procurement, development, and production management ensure that all departments are aligned from the earliest stages of customer inquiries. This allows the head of production to be informed before orders are confirmed, and delivery dates can be discussed early in the process.

For direct suppliers, where ALBIRO manages production planning, planning is done in-house and in close cooperation with the production sites. ALBIRO has detailed knowledge of supplier capacity, including sewing minutes and available workforce, and uses this to match orders to capacity. Production is divided into areas based on product complexity, and planning is shared via a regularly updated document. This enables early identification of potential overtime, which is generally avoided. In 2024, Saturday work was required in a few cases to meet delivery deadlines, and ALBIRO covered the overtime premium to avoid penalising suppliers.

For indirect suppliers, where ALBIRO does not manage production planning directly, an tracking system is used to monitor delivery timelines. This is shared weekly between procurement and suppliers. If delays occur, options such as air freight are considered, and The member brand assumes the cost if it or the customer is responsible. An overtime policy is in place for these suppliers, prohibiting overtime for ALBIRO orders, and audit reports are regularly reviewed to ensure compliance.

To reduce pressure during peak season (July–December), ALBIRO aims to finalise as many orders as possible before July. The company also avoids last-minute design changes by requiring design approval before production begins. This system, combined with regular communication and forecasting, helps maintain realistic timelines and supports fair working conditions across the supply chain.

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

Comment: ALBIRO has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. The company generates the majority of its turnover through production sites it utilises fully, where it has direct insight into cost structures and wage payments. In several of these locations, ALBIRO receives transparent cost breakdowns and has verified the link between its prices and wages paid to workers. For other suppliers, ALBIRO indirectly assesses this connection by reviewing audit reports, payslips, and wage data to ensure at least minimum wage compliance. In some cases, suppliers have provided additional wage information through tools such as the Fair Price app. This approach allows ALBIRO to align its pricing with wage developments, including adjustments for inflation or legal wage increases, even when full cost transparency is not available.

Recommendation: The member brand could provide suppliers who do not work with fact-based costing, training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

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

Comment: ALBIRO has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support the implementation of the CoLP by supporting in CAP follow-up, checking capacity at the factories, reporting back on any issues to the brand. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP)

Layer 3 Prevention, mitigation and remediation

Possible Points: 90

Earned Points: 80

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

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

Comment: ALBIRO has prioritised risks and created action plans per supplier, counting for 100% of the total FOB. These match the risk profile by taking into account country-level risks, factory-specific findings, and thematic concerns such as freedom of association and gender. The severity and likelihood of each risk inform the level of priority and the type of follow-up required.

The action plans detail different approaches to prevent, mitigate, and remediate the prioritised risks and include a budget and timeline. Each production site has a tailored prevention programme, outlining step-by-step activities to be implemented within a defined timeframe. These plans are based on findings from audits, assessments, and stakeholder input. In 2024, ALBIRO began transferring its planning and monitoring tools from a spreadsheet and online cloud service to the Fair Wear Member Hub, with full integration expected in 2025. Where discrepancies between factory-level information and country risk data are identified, additional monitoring measures are triggered to ensure appropriate follow-up.

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

Comment: ALBIRO has applied a gender lens in both its improvement and prevention steps, and this approach is integrated across all its action plans. The process began with raising awareness on gender-related issues among production partners, particularly at management level. This was followed by the collection of gender-disaggregated data through surveys and factory-level data gathering. The data was then analysed to identify patterns of inequality, which informed the development of gender-responsive goals based on the UN Women's Empowerment Principles.

This approach builds on the gender risk identification described under indicator 2.9, where ALBIRO demonstrated a strong understanding of gender-related risks in its sourcing countries. This alignment between risk identification and follow-up action reflects a coherent and systematic application of the gender lens.

In 2024, ALBIRO created a sample Gender Action Plan and shared it with all suppliers, requesting them to define their own actions for implementation throughout 2025. These plans are monitored alongside corrective and preventive action plans. For example, in one case, ALBIRO worked with a supplier to ensure that the next supervisor role would be filled by a woman, to strengthen female representation in decision-making.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Advanced	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	6	6	0

Comment: ALBIRO included comprehensive steps to encourage Freedom of Association (FoA) and effective social dialogue in all its action plans. These measures are embedded in its prevention programme and applied across all production partners. The brand began by integrating FoA-related questions into the Fair Wear questionnaire to gather baseline information on each production site. Suppliers are required to have a FoA and collective bargaining policy in place and to develop a strategy for strengthening social dialogue. This includes defining how and when exchanges with workers take place and ensuring the presence of freely elected worker representatives or committees. Training sessions are conducted to raise awareness among both workers and management about FoA rights and responsibilities. In 2023 and 2024, ALBIRO expanded these efforts to all suppliers, requesting internal agreements or policies on FoA and collective bargaining, and encouraging training on these topics. In cases where risks were identified, such as in Türkiye and India, ALBIRO engaged directly with worker delegations, reviewed voting procedures, and confirmed the democratic election of representatives.

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

Comment: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship or are monitored systematically every year. ALBIRO requires all suppliers to have a functioning grievance mechanism in place before the first order is placed. This requirement is formalised in the Supplier Code of Conduct, which all suppliers must sign. The code also mandates that the Fair Wear complaints hotline be visibly posted in production areas, ensuring workers can access it without surveillance. As part of its prevention programme, ALBIRO expects suppliers to implement their own internal grievance systems and train employees accordingly. The effectiveness of these mechanisms is monitored through worker and management interviews, audit reports, and onboarding training sessions. In 2023 and 2024, ALBIRO conducted Fair Wear training sessions at several production sites and distributed materials such as power banks printed with the Fair Wear hotline to raise awareness.

When factory-level mechanisms are found to be ineffective, ALBIRO supports improvements by engaging worker representatives and encouraging the use of internal processes. If management is unresponsive, ALBIRO supports escalation to external mechanisms. The presence and functionality of grievance mechanisms also influence purchasing decisions, with expansion at a supplier only considered once a reliable system is in place.

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

Comment: ALBIRO cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. The member company can demonstrate it works on joint prevention, mitigation and remediation. At suppliers that are not shared with other members, ALBIRO works together with other customers. For example, ALBIRO collaborates with other Fair Wear members and customers at several production sites: at one supplier, it works with other brands on preventive actions such as joint training sessions; at another, it coordinates with partners on audits, CAP follow-up, and training activities. ALBIRO also engages with other customers beyond Fair Wear membership. Even where suppliers are not shared with Fair Wear members, ALBIRO reaches out to other customers to align on human rights due diligence efforts. This includes onboarding coordination and sharing knowledge to support risk assessments.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	60%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2

Comment: During the performance check ALBIRO could demonstrate it has followed up 60% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. Some CAP issues that require improvement plans at a supplier in Türkiye are still open and therefore need more time to be remediated. These are mostly issues related to overtime and wages.

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

Comment: ALBIRO has identified some root causes of the CAP issues and discussed these with its suppliers. The member has started to develop some preventive steps addressing these root causes. Examples of the discussed root causes include excessive overtime, which in one case was linked not to ALBIRO's production planning but to internal factory practices, such as workers choosing to work on Saturdays to meet efficiency targets set by the factory. In response, ALBIRO addressed the issue by increasing its buying prices and assigning an external person to support the supplier in managing working hours more effectively. Other root causes identified included gaps in health and safety practices, such as failure to monitor temperature or electrical wiring due to the absence of a responsible person. ALBIRO responded by requiring the appointment of designated staff to oversee these areas and integrating these expectations into its prevention programme. These steps are part of a broader effort to move from reactive to preventive approaches in collaboration with suppliers.

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

Comment: ALBIRO has no suppliers where action plans are not needed.

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

Comment: In the previous year, four audit reports out of six (both third-party and Fair Wear assessment) mentioned excessive overtime. ALBIRO analysed the root causes of these findings. According to the member, low productivity levels and production errors are significant causes for excessive overtime. At two suppliers, workers were regularly working on Saturdays to meet internal efficiency targets, not due to ALBIRO's production planning. ALBIRO addressed this by holding off-site discussions with the factories and agreeing to increase buying prices, allowing suppliers to plan with more realistic productivity expectations. Since July 2024, no Saturday work has occurred at these sites, a change verified through a Fair Wear Foundation full assessment. At another supplier, overtime was linked to frequent production errors that required correction. ALBIRO responded by deploying additional technicians to the site to reduce the likelihood of such errors recurring. In addition to audit reviews, ALBIRO cross-checked overtime findings with anonymous employee surveys conducted in 2023 and 2024. At one supplier, although a reduction in overtime was noted, the lack of complete production records prevented full verification. ALBIRO is currently working with the supplier to ensure manual production records are properly maintained.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Advanced	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	4	4	-2

Comment: In the previous year, four out of six audits (both third-party and Fair Wear assessment) included findings regarding non-payment of legal minimum wage or legally required wage elements. ALBIRO responded immediately to these findings by initiating direct dialogue with the suppliers involved, prioritising the issue and verifying the situation through documentation such as payslips and audit reports. In cases where ALBIRO holds high leverage, such as at suppliers where it manages the majority of production, there was a direct correlation between purchasing practices and wage compliance, prompting immediate engagement and follow-up. The member has addressed this and promotes transparency about wages by requesting evidence of compliance, such as confirmation of legally mandated bonuses, and by encouraging suppliers to share wage data openly. ALBIRO also considers leverage when determining the appropriate response, recognising that wage issues at suppliers with lower leverage may be influenced by other customers. ALBIRO has included workers' representation in finding a solution to these findings by supporting dialogue between management and worker representatives and ensuring that any remediation efforts are communicated transparently.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	6	6	0

Comment: ALBIRO understands which suppliers pay wages below living wage estimates as a consequence of the member's actions. ALBIRO followed up on this and reviewed internally how the member's practices, particularly pricing and production planning, could be altered and ensured this was done. In 2024, ALBIRO conducted a detailed wage analysis using audit data, wage records, and employee surveys to identify wage gaps. Based on this, it prioritised suppliers in Bosnia and North Macedonia, where the gap between legal minimum wages and living wage estimates was most significant. Based on the root cause analysis, ALBIRO has developed a time-bound plan to enable the systemic increase of wages at all its suppliers. This includes prioritising high-risk locations, engaging in dialogue with suppliers, and gradually expanding wage improvement efforts across the supply chain.

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

Comment: ALBIRO has created a strategy to finance wage increases which includes raising prices and reducing gross profit margins. This strategy has been agreed upon by relevant management staff, including the CFO. The approach is currently being tested in selected factories and will be expanded based on the outcomes. ALBIRO raised prices at three suppliers to enable wage increases, ensuring that all workers, including those receiving bonuses and annual entitlements, were paid above the legal minimum. In Bosnia, for example, prices were adjusted to support wages exceeding the new minimum wage. In North Macedonia, ALBIRO financed the development of a wage scale and resumed a living wage project at one supplier. These actions were informed by root cause analyses, which identified low productivity, small order volumes, and pricing as key factors. ALBIRO discussed these findings internally and with top management, leading to a strategy focused on enabling wage improvements through adjusted pricing and operational support. The member has discussed wage increases with its factories. At several production sites, ALBIRO raised prices to enable wage increases above the legal minimum. For example, in Bosnia, wages were increased to exceed the new minimum wage, and in North Macedonia, price adjustments allowed for the payment of bonuses and the resumption of a living wage project. These discussions included transparency on wage structures and commitments to ongoing improvements. ALBIRO has started analysing the costs of financing wage increases across its supply chain. It has calculated the financial impact of wage increases and agreed internally, together with top management, that wages should rise by at least 3% above legal minimum wage increases and inflation until living wage benchmarks are reached. Working with its suppliers, ALBIRO has developed a time-bound plan to increase wages, including target wages which increase gradually to finally reach the living wage estimate. These targets are tailored to each country and production site and are tracked through a central wage overview.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	15%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

Comment: ALBIRO uses fact-based costing to ensure its prices support the payment of a living wage estimate at suppliers responsible for 15% of ALBIRO's FOB.

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

Comment: ALBIRO received two complaints in the past financial year concerning No discrimination, Living wage, Legally binding employment relationship at its suppliers in North Macedonia. The first complaint related to the payment of unused holiday leave and excessive overtime. ALBIRO, together with factory management, resolved the issue by ensuring the worker received the outstanding payment, including social benefits, and by agreeing that Saturdays would no longer be regular working days. Overtime, when necessary, would be paid at a premium rate. A local person was appointed to monitor working conditions and ensure compliance going forward. The second complaint concerned unpaid severance entitlements. ALBIRO responded immediately by entering into dialogue with the factory and ultimately covering the severance payments not only for the complainant but also for all workers who had retired from the factory in the previous two years. To prevent similar complaints from occurring in its supply chain, ALBIRO has strengthened its monitoring and remediation processes. This includes assigning local contacts for follow-up, verifying payments through documentation, and engaging directly with factory management to ensure that workers' rights, such as payment of overtime, public holiday work, and severance, are respected and upheld.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Advanced	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	6	6	0

Comment: Even though it is not part of a CAP, ALBIRO has implemented training Fair Wear Onboarding Module 1 and Fair Wear Fair Price Training at six suppliers in four countries.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Advanced	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	6	6	0

Comment: ALBIRO followed up on all training results by systematically reviewing the outcomes of conducted trainings and embedding them into its prevention programs. Recognising the growing demand from employees for a more intensive dialogue with management, ALBIRO intensified its efforts in social dialogue throughout 2024. This included advocating for internal training from suppliers and establishing regular exchanges between worker representatives and management. These steps were taken not only to reinforce the training impact but also to address underlying issues identified during the follow-up.

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

Comment: ALBIRO's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member did not exit any suppliers. While ALBIRO did discuss the responsible exit strategy with all its suppliers, it did not share the complete exit policy, including the different steps of responsible disengagement with all its suppliers.

Recommendation: ALBIRO could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation.

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

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

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 26

Earned Points: 22

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

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

The member also uses other channels to inform customers and stakeholders about Fair Wear membership. By communicating on social media, in newsletters and catalogues, through email signatures, in tender documents, on garment hangtags, and during customer visits, ALBIRO actively spreads the Fair Wear message.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	Intermediate	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	2	4	0

Comment: ALBIRO sells external brands. The member has collected some information about the human rights due diligence of these brands. The information that ALBIRO collects does not influence decision-making on which brands it sells. Most of the external brands, however, are members of a credible initiative.

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

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

Comment: ALBIRO has submitted its social report, which Fair Wear reviewed.

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

Comment: ALBIRO published its social report, which includes some factory-level data and remediation results, on its website. The factory level data ALBIRO included are main findings and completed and suggested actions as part of the prevention programme.

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

Comment: ALBIRO has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. In its evaluation system, the member includes triangulated information from external sources, such as worker and supplier feedback.

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

Comment: The previous performance check included requirements to include shared responsibilities on implementation of Code of Labour Standards in its contracts. While a lot of work has been put into this requirement, the brand has yet to establish an agreement that explicitly defines the shared liability within the business relationship.

Recommendation: ALBIRO is strongly recommended to address the requirements that are still outstanding.

5 Appreciation chapter

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

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

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

Recommendations to Fair Wear

The member brand mentioned that its Brand Liaison changed frequently, whereas the brand values consistency. ALBIRO continued to use a combination of the Member Hub and an Excel file for its risk scoping, as the risk scoping tool could not be adapted to their needs throughout 2024 and much of 2025. The brand is now preparing to test the newly released version of the risk scoping tool.

Brand Performance Check details

Date of Brand Performance Check: 08-07-2025

Conducted by: Jason Mandels

Interviews with: Lukas Loosli, CEO

Corinne Loosli, CEO

Heiko Abbondanzieri, Head of Production

Linda Thommesen, CSR Manager, Production Technician