



Brand Performance Check

Heigo Nederland B.V.

Publication date: February 2025

This report covers the evaluation period 01-01-2023 to 31-12-2023

About the Brand Performance Check

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

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

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

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

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

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

Scoring overview

Total score: 122

Possible score: 190

Benchmarking Score: 64

Performance Benchmarking Category: Good



Summary:

Heigo has shown progress and met many of Fair Wears' performance requirements. With a total benchmarking score of 64, the member is placed in the 'Good' category.

Heigo has a sourcing strategy aimed at addressing and influencing labour conditions. The brand owns a Bulgarian production site covering more than 85% of its FOB. The brand sources from additional suppliers or external brands for products that cannot be produced internally. The sourcing strategy explicitly focuses on long-lasting business relationships and includes a consolidation process. While the contracts with suppliers include an intention for long-term partnership, the contracts do not yet include a commitment of a specific amount of years. Therefore, the member has yet to commit to long-term contracts across its supply chain.

The member adjusted its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding the countries where the brand may source; in particular, countries with higher risks cannot be part of the company's supply chain. The member is recommended to include all risk factors in its risk scoping including business model, sourcing model and product levels.

Heigo has prioritised the risks assessed at its own production location in Bulgaria and used the Corrective Action Plan based on the audit findings. For the other countries, there's a risk scoping through the HRDD tool and some monitoring by the brand. The supplier based in Portugal is visited by Heigo's agent, the brand directly contacts them twice a year. The Hungarian suppliers are contacted by phone. Monitoring tools do not yet explicitly include workers, stakeholders and/or supplier input.

As the brand owns a production location in Bulgaria, Heigo has a good understanding of the wage levels in its factory and, therefore, can link its buying prices to the wage levels. The brand has started implementing some strategies to finance living wages, such as higher efficiency on the factory floor, reduced margins and higher prices for its clients. In a few cases, the brand has absorbed the payment of the set target wage with its own margins as the tendering clients did not want to pay a higher price that would support living wages

The brand has developed a very strong planning system that has eliminated excessive overtime. In particular, the suppliers create their own planning overview, which is shared with Heigo, and it is accepted by the brand without any changes.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for member brands. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

Performance Category Overview

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

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

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

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

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

Company Profile Heigo Nederland B.V.

Member company information

Member since: [1 Jan 2005](#)

Product types: [Workwear and Safety Footwear, PPE-equipment](#)

Percentage of turnover of external brands resold [50%](#)

Member of other MSI's/Organisations [Agreement on Sustainable Garment and Textile](#)

Number of complaints received last financial year [0](#)

Basic requirements

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

Work Plan and projected production location data have been submitted for the current financial year? [Yes](#)

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

Production Country	Number of production locations	Percentage of production volume
Bulgaria	7	94.27%
Hungary	1	2.97%
Portugal	1	2.77%

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 complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

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

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

Comment: Heigo 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: Heigo 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: 78

Earned Points: 54

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: Heigo has a sourcing strategy addressing influencing labour conditions. Heigo's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. In particular, the brand's commitment to sustainability and improved working conditions led to a responsible exit strategy from countries with heightened due diligence and moved all its production to European countries (Bulgaria, Hungary and Portugal). The brand aims to produce all its collections at its own production location in Bulgaria or by selling products from external brands. If this is not possible due to specific product types, the brand uses additional suppliers or subcontractors. If possible, the brand selects factories where other Fair Wear members are also sourcing.

The member has nine active suppliers. 92% of the production volume comes from suppliers where the member has at least 10% leverage. Almost 6% of the production volume comes from suppliers where Heigo buys less than 2% of its total FOB.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

Comment: Heigo has a sourcing strategy that focuses on maintaining long-term relationships. 98% of the member's total FOB volume comes from suppliers with whom Heigo has had a business relationship for at least five years. In addition, the member owns its main production facility accounting for 85% of its FOB. While the contracts with suppliers include an intention for long-term partnership, the contracts do not yet include a commitment of a specific amount of years. Therefore, the member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Heigo to commit to long-term contracts 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.	Basic	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	2	6	-2

Comment: Heigo conducts risk scoping on country level and has included all eight labour standards. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. Heigo conducts risk scoping and includes the following risk factors: discrimination and gender, child labour, forced labour, freedom of association, living wages, safe and healthy workplaces, reasonable hours of work, and legally binding employment relationships.

The risks for Bulgaria and Hungary both include freedom of association, risk of forced labour, discrimination and gender, living wage and health and safety. For Portugal the main risk identified was living wage.

The member adjusted its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding the countries where the brand may source; in particular, countries with higher risks cannot be part of the company's supply chain. While Heigo's sourcing strategy does not explicitly privilege countries where workers can freely form or join a trade union and/or bargain collectively, the brand sources from countries where freedom of association and collective bargaining are partially protected by law.

Recommendation: Fair Wear recommends Heigo to include all risk factors in its risk scoping including business model, sourcing model and product levels.

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 Heigo to inform new suppliers about Fair Wear membership by visiting the factory and engaging in a dialogue about human rights due diligence with suppliers. In addition, the brand shares the Code of Labour Practices with the new suppliers and requires that it is signed before placing the first order.

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.	2nd+ year member and no new production locations selected.	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.	N/A	6	0

Comment: In the previous financial year, Heigo has not added any new suppliers.

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.	No production locations in the first year of business.	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.	N/A	6	0

Comment: In the previous financial year, Heigo has not added any new suppliers.

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.	Basic	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	2	6	0

Comment: Heigo has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for its Bulgarian supplier base. For instance, the brand assesses human rights risks in its production locations in Bulgaria by keeping regular contact with the suppliers through phone calls, monthly factory visits and audits. The main supplier in Bulgaria conducts visits to the subcontractors on a weekly basis. One of these subcontractors has also conducted a factory assessment by Fair Wear. For the other countries, there's a risk scoping through the HRDD tool and some monitoring by the brand. The supplier based in Portugal is visited by Heigo's agent, the brand directly contacts them twice a year. The Hungarian suppliers are contacted by phone. Monitoring tools do not explicitly include workers, stakeholders and/or supplier input.

Recommendation: Fair Wear recommends Heigo to approach the assessment of risk in its production locations systematically, identifying the appropriate tool and frequency depending on the outcome of the risk scoping and risk assessment. Heigo could complement its risk assessment process with worker, supplier, and stakeholder input.

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

Comment: Heigo 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. In particular, the brand observed that Bulgaria and Hungary present a high risk of repression of trade unionists in the textile sector. In addition, it was reported that the union members are paid less. Both countries score 3 on the ITUC Global Rights Index (scale 1-5) for freedom of association and workers' rights, meaning that rights are regularly violated. According to the member, due to the limited motivation to join a union there's limited influence possible from the brand.

Recommendation: Heigo is strongly recommended to deepen its understanding of risks to FoA in its supply chain including the potential ways to determine influence and impact at supplier level.

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.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0

Comment: Heigo has included gender in its human rights risk identification. The member could show it understands the basic gender risks for its sourcing countries, and for instance, the member identified unequal wages based on gender as an important risk prevalent in all its sourcing countries. Risks such as forced overtime, workers cannot freely form or join a union and management fails to comply with requirements when dismissing workers is also more prevalent to women workers, according to Heigo. The member has yet to analyse the collected gender-disaggregated data at the factory and country levels.

Recommendation: Heigo is recommended to collect gender data per factory related to every Code of Labour Practices.

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

Comment: Suppliers' human rights performance is evaluated systematically every year. In particular, the member conducts a risk assessment at the factory level yearly. The brand evaluates its suppliers based on factory visits and audits. Heigo shares the outcome of the evaluation with its suppliers and worker representation. For Portugal, the agent is encouraged to share the outcome with the factory. The brand integrates the outcome of this evaluation into its purchasing decisions. Heigo has decided to only source in countries with fewer risks and has exited factories in the past that were not committed to human rights and responsible business conduct.

Recommendation: Heigo is recommended to follow up with the agent in Portugal on the human rights performance of suppliers and how it can influence purchasing decisions.

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: Heigo uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. So far, there is no evidence of missing first-tier locations in the database. According to the brand's subcontracting policies, no more than seven subcontractors are allowed and they must be pre-approved by Heigo's CEO. The member has taken active measures to prevent unauthorised subcontracting or unknown locations such as an unauthorised subcontracting policy and an agreement all suppliers have to sign and by knowing suppliers' production capacity and expertise.

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: According to the member there is a very low risk of homeworkers being used by its suppliers because Heigo hold a high level of transparency in production. The member has yet to look into specific production processes to validate the suppliers' statements that no homeworkers are used.

Recommendation: Fair Wear recommends Heigo to conduct a capacity analysis looking into specific production processes to validate the suppliers' statements that no homeworkers are used.

Indicators on Responsible purchasing practices

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

Comment: The member has agreements in the form of contracts with its Bulgarian suppliers accounting for almost 95% of its FOB. This includes Heigo's own production facility which accounts for 85% of its FOB. The contracts signed between its own supplier in Bulgaria and the subcontractors include payment terms of 10 days after delivery. The penalties included in these contracts are all in favour of the brand, and it is unclear who shall bear the consequences of last-minute changes that the brand may request. Heigo requests all its suppliers to sign its responsible business conduct policy, where responsibilities are set in implementing the Code of Labour Practices. Heigo does not use contracts with its other suppliers in Hungary and Portugal.

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

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

Comment: Heigo actively shares relevant CSR information with other departments during Heigo's team monthly meetings. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. In particular, Heigo's CEO regularly visits the brand's own production location in Bulgaria and reports back to other departments, including the CSR manager.

The brand has yet to develop KPIs that support the brand's sourcing strategy and responsible business practices. The member has not yet included responsible business practices in job role competencies as new employees will be trained by Heigo's teams on their way of doing business and approach to sustainability.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	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: Heigo's purchasing practices support good production planning and reasonable working hours. The brand has introduced an ERP planning system to avoid or reduce overtime. This planning system has also improved efficiency as the production can be monitored in real-time. The brand informs its main Bulgarian supplier (owned production location), the Hungarian and the Portuguese suppliers (only for specials) of the forecasted orders and asks them to do their own planning based on their capacity. Heigo generally increased the lead times of orders from six weeks to eight or ten weeks. The brand roughly knows which orders will come in over the year, as these are from existing clients and procurement procedures. Heigo is entirely transparent with its own factory; in particular, the company allows the factory to access Heigo's warehouse stock figures, resulting in a better forecasting system for both parties. Once the suppliers have informed Heigo of the delivery dates, the brand will communicate them to its clients without negotiation. In case one of the suppliers or subcontractors cannot deliver on the originally agreed date, the brand moves the production to another production location by postponing the less urgent orders or by using the products stored in the warehouse.

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

Comment: Heigo has a strong understanding of the wage levels at its suppliers and connects this understanding to its buying prices. The brand applies open-costing with its own factory in Bulgaria and its subcontractors. Heigo has advanced insight into the labour component of its prices and knows the number of actual sewing minutes needed for each product. In particular, the brand knows the costs needed for the materials, the labour and the overhead costs. The new production monitoring system allowed the brand to determine the sewing minutes needed to produce items. In addition, the brand uses Fair Wear's product costing guidance and templates. Heigo knows the labour minute value at most of its suppliers. Buying prices are adjusted accordingly.

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: Heigo has informed its sourcing intermediary of Fair Wear requirements and could show they informed production locations. At the same time, the brand has a direct relationship with the supplier based in Portugal; in particular, the brand informs the factory management of the orders and directly pays the supplier. The intermediary in Portugal is required to visit the factory on a weekly basis, check that no use of subcontractors is made, and monitor the production and the quality. The agent is also responsible to implement the Code of Labour Practices by ensuring that the Worker Information Sheet is up to date and posted on the factory walls.

Layer 3 Prevention, mitigation and remediation

Possible Points: 86

Earned Points: 52

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: Heigo has prioritised risks and created action plans per supplier, counting for 100% of the total FOB. These match the risk profile prioritising actions for the highest risks, mainly around living wages. The current action plan describes a general overview with consistent follow up on wage-levels. The brand could add more detailed actions that could address risks relating to FoA and gender specific issues. Heigo could also define prioritisation the actions based on the severity and likelihood of the risk.

Recommendation: Fair Wear recommends the member to further improve its action plans.

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

Comment: The brand has assessed gender-specific issues, but has yet to apply the gender lens in action plans.

Requirement: Heigo must start including a gender lens in action plans.

Recommendation: Heigo is recommended to extend its gender lens to all action plans.

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.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: Heigo included some steps to encourage freedom of association and effective social dialogue in its improvement or prevention actions. Heigo has started with some steps to encourage freedom of association and social dialogue. The brand facilitates and encourages participation of worker representatives for meetings. The brand's CEO also directly engages with workers during visits to gather input on working conditions.

Recommendation: Fair Wear recommends Heigo to include more concrete steps encouraging FoA and effective Social Dialogue in all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Intermediate	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	4	6	0

Comment: Heigo has established a basic internal grievance mechanism at its own production location in Bulgaria. The grievance mechanism is composed of a suggestion box, a hierarchical complaints process and the possibility to approach worker representatives to submit a complaint. Generally, the brand does not assess or monitor its suppliers' internal grievance mechanisms at the start of a business relationship or once it has started. The member company relies on Fair Wear assessments to monitor the effectiveness of the grievance mechanisms.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Basic	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	2	6	0

Comment: Heigo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints, if present. Heigo has not yet cooperated with customers that are not Fair Wear members.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	39%	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 Heigo could demonstrate it has followed up 39% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year.

During the performance check, the member could demonstrate with a sample just over one-third of the CAP issues requiring improvement actions have been followed up. For its main supplier in Bulgaria, there was a finding that employee information was not accessible in the own workers language, which was resolved. There was also an unclarity on the wage slips, and the management followed up to explain what the salary consisted of. There were a few health and safety measures which were followed up by facility managers and Heigo's CEO including adding ergonomic chairs, anti-fatigue mats, overlocks for the sewing machines and safety guards.

Some findings still remain open for continuous follow up to verify the CAP has been resolved, and for more complex issues such as living wage.

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

Comment: Heigo 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 are prices don't support living wages. The member has renegotiated price increases around 20-25%. There was also a finding that workers were not aware of the Code of Labour Practices and that the Worker Information Sheets were outdated. Heigo provided a newly updated worker information sheet. Another follow up which was still open at the end of 2022 was that a supplier in Bulgaria had no internal grievance mechanism. For this the follow up in 2023 was that an internal policy was created and shared with the workers through an announcement board. For FoA, the brand has actively included worker representatives during meetings concerning working conditions or follow up on factory assessments.

Recommendation: Fair Wear recommends Heigo to investigate the other root causes of the audit findings together with its suppliers and develop written preventive action plans.

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.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

Comment: Heigo has only one supplier based in Portugal, where improvement or prevention actions are not needed. This covers almost 3% of the member's total FOB. Heigo monitors the supplier via its agent (who visits the factory on a weekly basis) and regularly checks if there are changes to the risk situation. In addition, Heigo has a direct business relationship with this supplier and they discuss via phone two or three times per year orders, payments and human rights. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

Recommendation: Heigo is recommended to ensure worker representation/local unions (when appropriate) are included in discussions with factory management on possible human rights risks.

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

Comment: In the previous year, no audits took place. Heigo analysed the root causes of excessive overtime. According to the member, overbooking and no systematic planning are the main causes of excessive overtime. The member has taken action to address the root causes. Heigo uses an ERP planning system that is completely digitalised and regularly updated by the factories and the brand. This way, the brand knows the suppliers' capacity and can check in real-time if there are bottlenecks in production to prevent excessive overtime. In addition, the brand asks suppliers to develop a planning-production schedule that Heigo accepts.

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

Comment: At one of the suppliers, internal records regulating overtime working hours were not evidenced during document inspection. Even though overtime does not happen on a regular basis, overtime could occur a few times a year. Wages could not be verified due to inconsistent or incomplete records. The quality manager at Heigo's owned production location is responsible for following up on this finding and has required the subcontractor to set up a transparent system to keep track of wages.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	4	6	0

Comment: Heigo owns a production location in Bulgaria and works with a few subcontractors in Bulgaria and with other suppliers in Portugal and Hungary. In none of these production locations, living wages are paid. So far, the brand is focused on setting a target wage (Clean Clothes Campaign and Wage Indicator) for its own production location in Bulgaria and has yet to address the topic with other suppliers as there are no plans to set target wages at additional factories.

The brand has conducted a root causes analysis for wages below living wages and assessed the following: inefficient production processes, inflation, rising energy costs, and the member's own customers unawareness of social compliance are among the main causes of the low wages. At the same time, Heigo has also recognised that low wages are a consequence of higher brands' margins. Heigo has also introduced a new planning and production evaluation system that enabled workers to check in real-time their production and led to more efficiency as they are paid by piece.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	4	6	0

Comment: Heigo has started to address the topic of living wage internally and in consultation with the CEO. The member has also discussed wage increases with its own factory in Bulgaria and has set a target wage (60% of the living wage benchmark based on the estimates of Clean Clothes Campaign and Wage Indicator). In particular, the brand used the labour minute costing tool to determine the labour costs to produce its items.

The brand has started implementing some strategies to finance living wages, such as higher efficiency on the factory floor, reduced margins and higher prices for its clients. In a few cases, the brand has absorbed the payment of the set target wage with its own margins as the tendering clients did not want to pay a higher price that would support living wages. However, Heigo has not yet started analysing the costs of financing wage increases across its supply chain.

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

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.	85%	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.	6	6	0

Comment: Heigo uses fact-based costing to ensure its prices support the payment of a living wage estimate at its own production location that covers 85% FOB. The brand is financing its share of living wages by higher efficiency in production, reduced margins and increased pricing for its tendering clients. The brand's CEO is responsible for paying wages to workers at this production location and can directly check that workers receive a higher wage.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear's Access to Remedy Policy.	No complaints received	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.	N/A	4	-2

Comment: Heigo received no complaints in the past financial year.

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

Comment: Heigo has not organised any formal training at its suppliers. Based on the CAPs findings and the risk assessment, training would have been necessary to raise workers' awareness of the Code of Labour Practices and grievance mechanisms.

Requirement: Heigo needs to implement training to address the identified risks.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	N/A	6	0

Comment: Heigo did not implement training at its suppliers.

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: Heigo's human rights risk monitoring includes a responsible exit strategy. While the brand in the past financial year has not discontinued any suppliers, the brand showed to have a responsible exit strategy when it left China and Türkiye. Heigo does not yet include its responsible exit strategy in all supplier manuals or contracts. With one subcontractor from its main supplier in Bulgaria, an notice time period is set at three months.

Recommendation: Heigo could include the responsible exit strategy as part of all its suppliers' agreement or contract.

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

Comment: Heigo has started tracing beyond tier 2 to gain more transparency in its supply chain. In 2024 the member will start looking more into risk management in tier 2.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 26

Earned Points: 16

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	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: Heigo communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. In particular, Heigo actively spreads the Fair Wear message via social media, customers' magazines, product brochures, at workwear fairs and in all tender propositions.

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: Based on the member sourcing strategy, Heigo buys external brands' products when it is not possible to produce them in its own factory in Bulgaria or with its other suppliers. The member collects information about these brands' human rights due diligence. Heigo, before finalising any business relationship with external brands, informs them about its efforts to implement human rights due diligence and, from time to time, selects brands that are part of credible initiatives, like Fair Wear or Fair Labour Association. If the external brands are Fair Wear's members, Heigo selects companies that scored 'good' or 'leader' in the previous year's brand performance check, asks for information about the open CAPs at the factories where Heigo's products will be produced and require that these brands sign the Code of Labour Practices. Based on the importance of the suppliers, Heigo also visits the external brands' suppliers. The information that Heigo collects influences the decision-making on which brands it sells.

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: Heigo has submitted its social report, which Fair Wear approved. The brand has also published the report on its website.

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

Comment: Heigo does report some factory-level data and remediation results. As an example, the brand disclosed that the workers at its own production location in Bulgaria do not yet earn a living wage and shared the actual target wage. In addition, the brand shared that some improvements are still needed to solve occupational and safety findings (e.g., breaks during the working day). Heigo has yet to disclose its full factory list and its time-bound improvement plans.

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

Comment: Heigo has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. In particular, the brand uses open CAPs as the starting point for tracking progress. The approach is different for the brand's own factory and the subcontractors. Heigo's CEO visits the owned factory every five weeks and can closely track progress in this way. Recently, workers have started to share directly with the CEO about their concerns and wishes. This openness and trust help the CEO to track progress and validate results.

When it comes to subcontractors, the brand places the responsibility to track progress and validate results on the main supplier in Bulgaria or on its agent in Portugal.

In its evaluation system, the member does not yet include triangulated information from external sources, such as local stakeholders.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	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.	0	4	-2

Comment: The previous performance check included 5 requirements. For indicator 2.9, a gender lens had to be included for implementation of improvement or preventive actions. Heigo has yet to implement this in its actions plans. For 2.12, Heigo was required to identify whether homeworkers are used by its suppliers and assess if there is a risk of exploitation. The brand regards homeworkers to be a low risks in their supply chain, however has not looked into the risks of specific production processes to estimate whether homeworkers are used. For 2.13, written contracts with all its suppliers need to include shared responsibilities and support implementation of human rights due diligence. While Heigo requests all its suppliers to sign its responsible business conduct policy, where responsibilities are set in implementing the Code of Labour Practices. Heigo does not use contracts with its other suppliers in Hungary and Portugal. This requirements remains open for the next check. For 3.1, a prioritisation in follow-up needed to be added to its risk identification to match the factory's risk profile. In the previous financial year, this was addressed. For indicator 3.2, the member had to include a gender lens in the implementation of improvement or prevention actions, this still remains to be mapped out in the brand's action plans.

Recommendation: Heigo 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.: Yes

Comments: During the Circular Textile days, Heigo publicly responded to problems in the recycling industry. During the exhibition, Heigo and its partner CLS-Text took a stand against the huge amounts of discarded clothing being dumped, especially in Ghana. This not only has a direct negative impact on the local environment but also maintains the poor living conditions of the inhabitants. Many of the Code of Labor Practices are violated in this process. To prevent this, Heigo has been advocating to stop discarding clothes and instead opt for recycling high-quality clothes.

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

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

Recommendations to Fair Wear

Heigo recommends Fair Wear membership to include more collaboration with other brands, especially for the work wear member group. The member also thinks there can be more advocacy efforts to position the value of Fair Wear membership with governmental organisations.

Brand Performance Check details

Date of Brand Performance Check: **13-11-2024**

Conducted by: **Kathleen Gabriel**

Interviews with: **Tom Gerards - Manager Sustainability**

Johan Peters - Manager Buying