



# **Brand Performance Check**

## **Heigo Nederland B.V.**

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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# Scoring overview

Total score: 124

Possible score: 190

Benchmarking Score: 65

Performance Benchmarking Category: Good



## Summary:

Heigo has met most of Fair Wear's performance requirements. With a total benchmarking score of 65, 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 71% of its FOB. The brand sources products from additional suppliers or external brands 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 a long-term partnership and the member owns its main production location, they do not yet include a commitment for a specific number 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 the 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 did not include business model, sourcing model and product levels risk factors in its risk scoping.

Heigo has prioritised the risks assessed at its own production location in Bulgaria and used the Corrective Action Plan based on the audit findings, and it has started including a gender lens in action plans. The supplier, based in Portugal, is visited by Heigo's agent, and the brand contacts them directly 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.

Heigo has not organised any formal training with its suppliers. Based on the findings of the Corrective Action Plans and the risk assessment, training would have been necessary to raise workers' awareness of the Code of Labour Practices, as well as the roles of worker representatives, grievance mechanisms, and policies and procedures related to health and safety.

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

Heigo's most significant progress was seen in its planning system and its strategies to finance living wages. Challenges still remain in committing to long-term written contracts with all its suppliers and implementing training to address the identified risks in the Corrective Action Plans.

## 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 [40%](#)

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

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

## 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](#)

Membership fee has been paid? [Yes](#)

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

Production Country	Number of production locations	Percentage of production volume
Bulgaria	7	98%
Portugal	1	1%
Hungary	1	0%

# 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](#)

Comment: [Heigo has a solid Human Rights Due Diligence policy in place.](#)

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: [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: 56**

### 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.

The member has 9 active suppliers. 96% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 4% of the production volume comes from suppliers where Heigo buys less than 2% of its total FOB.

This is comparable to the previous year. Heigo's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Intermediate	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	4	6	0

**Comment:** Heigo has a sourcing strategy that focuses on maintaining long-term relationships.

86% of the member's total FOB volume comes from suppliers with whom Heigo has a business relationship for at least five years. While the contracts with suppliers include an intention for long-term partnership and the member owns its main production location, the contracts do not yet include a commitment for a specific number of years. Therefore, the member does not commit to long-term contracts yet

**Recommendation:** Fair Wear recommends Heigo to commit to long-term contracts.

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 the country level and has included all eight labour standards. The member has yet to include business model, sourcing model and product level risk factors in its risk scoping. In its risk scoping, the member has not assessed the impact and prevalence of all risks correctly, as the member does not consider country risks holistically but rather scopes them from a production location perspective.

The risks for Bulgaria and Hungary both include freedom of association, discrimination and gender, and living wage. For Portugal, the main risks identified were living wage and gender.

The member adjusts 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 level.

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 its HRDD policy and Fair Wear membership by visiting the factory and sharing the Code of Labour Practices with new suppliers, which should be signed before the first order is placed. No new suppliers were added in 2024. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Heigo can cooperate on this topic. Heigo asks suppliers to complete a Supplier Assessment Form, which can be submitted during a company visit by one of Heigo's employees or via email. Additionally, Heigo requests that suppliers share a valid audit report, which will be used as input for their supplier assessment. Manufacturers and suppliers shall inform Heigo of all locations used to manufacture products for Heigo and ensure that products are manufactured in locations known to Heigo, including those of subcontractors. In the event that a supplier does not commit to the Responsible Business Conduct Policy, Heigo requests that they develop improvements and solutions within a specified period. Arrangements will be made to take corrective measures in consultation with the member.

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 all its production locations, but it does it systematically only for its main production location and one subcontractor. In Bulgaria, Heigo maintains regular contact with suppliers through phone calls or monitoring visits, and enrolls them in full or modular assessments. The main supplier in Bulgaria conducts weekly visits to its subcontractors on a weekly basis. The supplier based in Portugal is visited by Heigo's agent, and the member directly contacts them twice a year. The supplier in Hungary is regularly reached by phone. The tools that Heigo uses for its risk assessment do not explicitly include worker, stakeholder and supplier input. Heigo only uses Fair Wear full assessments in its monitoring of its Bulgarian facilities.

**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. There are no risks identified in its supply chain since Heigo sources from countries where FoA is partially protected by law. According to the member, due to the limited motivation to join a union in Bulgaria, there's limited influence possible from the brand. The member has supplier-level monitoring in place to assess and understand the risk at its main supplier. Heigo uses in-depth discussions with its main supplier and full assessments to ensure supplier-level monitoring of the risk of violations to FoA.

**Recommendation:** The member is recommended to assess the status of FoA at the supplier level, understanding the risk at each of its suppliers - for example, through the Supplier Questionnaire (tool 2 in Fair Wear's FoA Guide), modular assessments on Social Dialogue, in-depth discussions with suppliers, or a full or modular assessment.

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 one of its sourcing countries, and for instance, identified differences in wages for women and men as important risks prevalent in Bulgaria. Additionally, Heigo collects gender data in its main production location. The data that it collects is the wage gap in the factory. This information is collected through interviews with workers. Heigo has analysed the collected gender-disaggregated data at the factory and country levels of its main production location. The main conclusions are: There is a difference between men and women about the wage gap, due to the fact that more men are in positions with higher salaries. The member specifically looked into how its business practices affect gender at its own production location. To compensate, the member incentivises women in managerial positions in their company and in their own production location.

**Recommendation:** Fair Wear recommends the member to collect country-level and factory-level gender risks for each Code of Labour Practices for all the countries and suppliers it is sourcing from.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Intermediate	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	2	4	0

**Comment:** Suppliers' human rights performance is evaluated systematically every year. Heigo conducts a risk assessment at the factory level yearly. The brand evaluates its suppliers primarily through factory visits and audits at most of its production locations. Heigo shares the outcome of the evaluation with its suppliers and worker representatives at its main production location. 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 source only from countries with lower risks and has previously exited factories that were not committed to human rights and responsible business conduct. The member has not yet collected information about the human rights performance of the production locations used by its licensees/partners.

**Recommendation:** Fair Wear recommends Heigo to share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives, including verifying with agents that the evaluation has been shared. Additionally, Heigo is strongly recommended to evaluate the human rights performance of suppliers used by its licensees or partners in design collaborations.

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. There is no evidence of missing first-tier locations (and/or) subcontractors in the database. The member takes measures to prevent unauthorised subcontracting or unknown locations, such as implementing an unauthorised subcontracting policy and requiring all suppliers to sign and agreement, and by visiting suppliers during production as part of its monitoring. Additionally, Heigo is aware of its 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 and it is able to track where each product has been produced. Additionally, Heigo's written contracts with its suppliers state that unauthorised subcontractors and home workers are not permitted. Since audits have not identified homeworkers, Heigo assumes that homeworkers are not used for its orders. The member has had a conversation about this with its suppliers, and it has analysed the capacity of suppliers to identify a potential risk.

## 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 98% of its FOB. This includes Heigo's own production facility, which accounts for 71% 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 that all its suppliers sign its Responsible Business Conduct policy, which outlines the responsibilities for 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 remove penalties for late delivery and product damages or defects from its contracts, or at least ensure there is 'proof of fault by the supplier'. Fair Wear recommends the member to enrol in the learning module 'Introduction to responsible contracting in the supply chain'.

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:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. Sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies. Examples of these KPIs are % of suppliers with corrective action plans closed within deadline; % of suppliers audited for human rights and labor practices; % of sourced materials/components traceable to origin (tier 1, 2, 3); Number of reported and resolved human rights or labor violations in supply chain.

**Recommendation:** 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 Enterprise Resource Planning (ERP) 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 ERP 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. Heigo includes changes in legal minimum wage or inflation in its buying prices.

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.	Intermediate	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	4	6	0

**Comment:** Heigo has prioritised risks and created action plans per supplier, accounting for 100% of the total FOB. These match the risk profile prioritising actions for the highest risks, mainly around living wages and freedom of association. The current action plan describes a general overview with consistent follow up on wage-levels. The brand could add more detailed actions that address risks related to FoA and gender-specific issues. Heigo could also define prioritisation of the actions based on the severity and likelihood of the risk. Though the action plans detail the different approaches to prevent, mitigate and remediate the prioritised risks, they do not yet include a budget or timeline.

**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:** Heigo has assessed gender-specific issues in their production facilities, and the outcome of their analysis is that there is an evident wage gap present in their supply chain. The brand added a gender lens in its action plans, specifically adding general actions to check wage differences in its supply chain. Currently, the member has corroborated this information through interviews with workers at its main production location only. The brand could make its gender lens in action plans more comprehensive, focusing not only on wage gap issues. Additionally, the member still has to implement the gender lens that it included in its action plans.

**Recommendation:** Fair Wear recommends Heigo to make the gender lens in its action plans more comprehensive. Additionally, Heigo is recommended to start implementing the gender lens it included in its action plans. Fair Wear recommends Heigo to consult Fair Wear's guide to gender-responsive human rights due diligence.

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 FoA and effective social dialogue in its action plans. These steps are checking if trade unions are active in its production locations. The member has yet to make these steps more comprehensive and detailed. The member has yet to start implementing these steps. The member has yet to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

**Recommendation:** Fair Wear recommends Heigo to include more comprehensive steps in its 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:** Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship or are monitored systematically every year (in case of long term partners). A complaints procedure for employees in the Heigo production chain is shared among its suppliers. Heigo has established a general complaints procedure that applies to all employees at its production sites. This includes an anonymous complaints box, a telephone helpline and the option to submit complaints via trade union representatives. The member informs factory management and employees about the importance and use of the complaints mechanism. If there is no internal complaints procedure, the member requests that its production location follow this procedure. Heigo actively supports and monitors the effectiveness of factory-level grievance mechanisms in its main production location. There, the member has established a team to support the grievance mechanism in the factory and assess its effectiveness in collaboration with the factory's worker representatives.

**Recommendation:** Fair Wear recommends Heigo to support and monitor the internal grievance mechanisms at all suppliers.

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.	Intermediate	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.	4	6	0

**Comment:** Heigo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers that are not shared with other members, Heigo works together with other customers to respond to findings. For example, in Portugal, the member cooperates with the brand Santino, which has a bigger leverage in their shared production location. The member collaborated with Omnisafe (not a Fair Wear member) in Belgium, which purchases its products from Varna Confectia. Heigo supports them if any problem arise in relation to the Code of Labour Practices at Varna Confectia. Heigo has yet to start cooperation on taking preventive measures.

**Recommendation:** We recommend Heigo to also work together on preventing human rights violations.

## Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	68%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

**Comment:** During the performance check Heigo could demonstrate it has followed up 68% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. Most resolved actions pertain to no discrimination and health & safety, while actions on living wage are still outstanding. During the performance check, the member could demonstrate with a sample that more than two third of the CAP issues requiring improvement actions have been followed up. The CAP issues that require improvement actions and are still open are issues that are more complex or structural, and therefore need more time to be remediated.

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

**Comment:** 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. Heigo calculated new prices with living Wages-tariffs. More tenders will be calculated with the labour minute costing-tool. Heigo continues the discussion with its production locations for achieving Living Wages. There was also a finding related to health and safety that the brand took up in its preventive action plans.

**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 1,27% 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 adjustments to be made to its risk assessment. 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 a lack of systematic planning are the primary 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, preventing excessive overtime. In addition, the brand requests that suppliers develop a planning-production schedule, which 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:** In the previous year, no audits took place. The member has addressed legal minimum wage requirements at its production locations and promotes transparency about wages by ensuring that each worker in its supply chain receives the legal minimum wage. If there are indications that suppliers are not paying the legal minimum wage, Heigo will immediately contact the factory management of the subcontractors to investigate the causes. To this end, the quality manager will request that the supplier provide an improvement plan with specific deadlines for correcting any necessary wage payments. The quality manager will then carry out regular checks to monitor progress, including verifying payslips. If minimum wage payments have not been made, Heigo will ensure that the supplier pays them retroactively for the relevant period. The member owns its main production location, and it has full control over wages. In a previous audit at one of its suppliers, wages could not be verified due to inconsistent or incomplete records. Verified remediation evidence still needs to be shared, but an audit is scheduled to take place in 2025.

**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 understands which suppliers pay wages below living wage estimates as a consequence of the member’s policies/actions. Heigo followed up on this and reviewed internally how the member’s practices, like setting prices and proposing prices to its costumers that includes payment of living wages, could be altered and ensured this was done. Heigo discusses the topic of wages with 100% of its suppliers. Heigo has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Based on the root-cause analysis, Heigo has developed a time-bound plan to enable the systemic increase of wages at its main production location.

**Recommendation:** Fair Wear encourages Heigo to discuss with all suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach.

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. Heigo does have an overview of wages paid in production locations. The member has discussed wage increases with its factories. Heigo has worked to set a target wage at its own production location. Heigo has an ad-hoc plan regarding the finance wage increases across its supplier base, proposing a higher price to its customers to cover wage increases. Heigo has a complete understanding of the costs of increasing wages 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.	71%	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 suppliers responsible for 71% of Heigo's FOB. However, the last audit (2022) shows that a living wage estimate is paid for 50% of the workers at Heigo's own production location, which is responsible for 71% of Heigo's FOB.

**Recommendation:** Fair Wear recommends Heigo to conduct a root cause analysis to check how it is possible that the paid wages are not above a living wage benchmark while the brand calculates with this benchmark in its pricing and has high leverage.

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, worker representatives, grievance mechanisms, and policies and procedures related to health and safety.

**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 due diligence system includes a responsible exit strategy. During the past financial year, the member did not terminate any supplier. Heigo does not yet include its responsible exit strategy in all supplier manuals or contracts.

**Recommendation:** Heigo could include the responsible exit strategy as part of 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.	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:** Heigo 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: 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:** Heigo sells external brands. The member has collected information about the human rights due diligence of these brands. The information that Heigo collects influences decision-making on which brands it sells. Two of the external brands are members of Fair Wear Foundation and Fair Labour Association.

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 reviewed. Heigo 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 reports factory-level data and remediation results. As an example, Heigo disclosed that the workers at its own production location in Bulgaria do not yet earn a living wage but Heigo shared the actual (legal minimum) wages and target wages. 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. The internal evaluation system involves top management. 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 the following requirements. For indicator 2.13, Heigo needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence. For indicator 3.2, Heigo must start including a gender lens in action plans. For indicator 3.15, Heigo needs to implement training to address the identified risks.

Heigo followed up on the requirement to start including a gender lens in action plans. Together, less than half of the requirements were addressed.

**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 in 2024, Heigo publicly responded to problems in the recycling industry. During this trade fair, Heigo and his partner CLS-Text took a stand against the enormous quantities of discarded clothing that are dumped, particularly in India and Africa. Not only does this have a direct negative impact on the local environment, it also perpetuates the poor living conditions of the inhabitants. Many of the Code of Labour Practices are violated in this process. To prevent this, Heigo advocates stopping the disposal of clothing and instead opting for the recycling of high-quality clothing. Heigo has two different recycling solutions for this purpose.

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 advises the Fair Wear Foundation as an NGO to draw the attention of government institutions to the social working conditions under which their purchased workwear is produced. Affiliation with Fair Wear by the supplier should be a minimum requirement for participation in tendering processes. Additionally, Heigo would like to use the Fair Wear logo more as a marketing tool, and advises revising the policy related to the communication of membership.

# Brand Performance Check details

Date of Brand Performance Check: **19-11-2025**

Conducted by: **Gloria Bolzonello**