

OLYMP

Human Rights Due Diligence Report

Reporting period (Financial year: January 2024 – December 2024)

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1. List of Abbreviations

AVE	Außenhandelsvereinigung des Deutschen Einzelhandels e. V. (for more info, click here)
ACFTU	All-China Federation of Trade Unions
CAP	Corrective Action Plan
CCC	Clean Clothes Campaign (for more info, click here)
CFRPP	Common Framework for Responsible Purchasing Practices (see chapter 3.1 Responsible Business Conduct)
CoLP	Code of Labour Practices (for more info, click here)
HRDD	Human Rights Due Diligence
LIC	Learning & Implementation Community (see chapter 3.1 Responsible Business Conduct)
LGBTQ+	lesbian, gay, bisexual, transgender, queer (or questioning), intersex, asexual, and others (see chapter 6.1 Linking Gender to human rights due diligence)
MBBS	Bachelor of Medicine and Bachelor of Surgery
NGO	non-governmental organization
OECD	Organization for Economic Co-operation and Development (for more info, click here)
RBC	Responsible Business Conduct
RSC	Ready Made Garment and Sustainability Council (for more info, click here).
XUAR	Xinjiang Uyghur Autonomous Region

2. About this report

This report relates primarily to OLYMP Bezner KG, which is the central organization in the “OLYMP Group”. If individual items within the report include other business units in addition to OLYMP Bezner KG, this is highlighted accordingly. The business activities of OLYMP Bezner KG include design, product development and procurement for its OLYMP, OLYMP SIGNATURE and MARVELIS brands and the OLYMP Corporate Fashion range as well as various private labels. It also takes care of all administrative and logistical tasks centrally. OLYMP Bezner KG is, therefore, the central organization within the “OLYMP Group”. With OLYMP Retail KG and its subsidiaries, OLYMP has also operated as a clothing retailer since the end of the 1990's. Other important sales units are OLYMP Digital KG and MARVELIS KG.

The Group is made up of several independent companies that are connected to each other primarily through their close business relationships and their ownership structures.

This report relates to the financial year corresponding to the calendar year and covers the period from 1 January 2024 to 31 December 2024.

For more information on our sustainability management as well as our sourcing strategy and pricing, production cycle and sourcing decisions, etc., please refer to our 2023 [Sustainability Report](#). This report will focus on our Human Rights Due Diligence, our social monitoring as well as the implementation of Fair Wear Code of Labour Practices.

3. Summary: 2024 goals & achievements

After several challenging years caused by the covid pandemic, OLYMP Bezner KG did not recover in 2024. OLYMP's turnover decreased lightly in the last financial year 2024 due to persistently difficult trading conditions. As a result, the revenues generated by shirts, knitwear, sweaters and accessories amounted to 212 million euros as of 31 December 2024. In 2023, it was still 231 million euros. At the same time, the OLYMP Group's workforce remained almost the same with ca. 930 employees in Germany, Switzerland and Austria.

Regarding social compliance, the growth of the business is pleasant news also for our production partners, but our efforts to implement the Fair Wear Code of Labour Practices and to conduct human rights due diligence were never slowed down. On the contrary, with 2024 being our second year during which we had a Fair Wear Brand Performance Check, many projects were initiated or continued.

In the financial year 2024, we achieved the following:

3.1 Responsible business conduct

- OLYMP's Brand Performance Check was conducted in September 2024. All results are published on our website as well as on our member profile on the Fair Wear Website. We improved our score to 52 points and were placed in the category “good”. The Brand Performance Check reviews four performance areas and evaluates a member's performance against standard criteria. This gives OLYMP the opportunity to identify areas with an acceptable performance as well as areas with potential for improvement.
- In autumn of 2024 we have completed the “Learning and Implementation Community” (LIC), organized by the “MSI Working Group of the Common Framework for Responsible Purchasing Practices” (CFRPP”). During the LIC we have started to set up supplier contracts. Their distribution is still ongoing. More on the Common Framework for Responsible Purchasing Practices can be found [here](#).

- We have set up a supplier rating regarding sustainability compliance. In 2025, we will implement this part in an overall supplier rating system.

3.2 Risk analysis 2024

- In 2024, we updated our risk analysis for the assembling stage and support processes. The most relevant results for specific risks in relevant countries are published as part of this report. This analysis is an important tool that we will continue to update on a regular basis. However, we understand that it is an ongoing process to further strengthen our human rights due diligence by linking the different elements of our product and country-specific risk assessments more strongly. The aim of complete integration will ensure an on-going and continuous risk assessment that is actively shared with and updated by different departments.

3.3 Social monitoring and preventive measures

- The iMPACT Program is an integral part of our social monitoring system and all factories, we work with are and will be monitored by the iMPACT Program or Fair Wear audits. We will step by step also include support processes who have no other social compliance audit or certificate. The audit tool itself is under constant development to keep up with new risks and focal issues. In 2025, we strengthen the audit system regarding gender.
- We have continued with our travel activities. The OLYMP Corporate Sustainability team visited ten production facilities (including five support process and three potential new suppliers) in two different countries in 2024. We have set up calls with other factories to discuss audit results, remediation measures and other topical issues.

3.4 Transparency & communication

- At OLYMP, we place great value on a transparent supply chain. This allows us to demonstrate that we act responsibly when sourcing our products and to support our customers' desire to purchase our products with a clear conscience. Therefore, we update the supplier list on our website regularly. In our supplier list we include all support process suppliers as well. The supplier list can be accessed [here](#).
- In December 2024, we published our new sustainability report on the financial year 2023 in which we describe how we live up to our responsibility at OLYMP. The report for 2024 will follow CSRD and will be published in summer 2025.
- We renewed our commitment to report annually on our human rights due diligence process and provide further information on key risks and measures. This Human Rights Due Diligence Report will be published additionally and contains in-depth information on our efforts regarding implementing human and labour rights.

3.5 Sustainability Strategy

At the end of 2024, OLYMP has adopted its new sustainability strategy. It entails 14 sustainability projects. Among those are the following:

- Occupational Health and Safety in the supply chain

The project aims at setting up a safety program at our CMT factories which are not covered by the International Accord, yet. With an external service provider, we will develop a guideline for suppliers defining minimum requirements on various safety issues. We will create an

assessment checklist to verify compliance with the guideline, and we will assess what kind of training measures could be implemented to support the implementation of the requirements.

- Working Conditions in the supply chain

The project aims at empowering workers in the supply chain. To this end, we will evaluate initiatives working on collective bargaining issues, e.g. ACT. Further, we will assess our monitoring systems and improve them where suitable to support suppliers to improve their social dialogue mechanisms.

- Living Wages

The project will encompass a pilot with one factory. It will entail a feasibility study how OLYMP's approach to paying its share of the living wage could look like.

- Management of supplier relations

The projects focus on a transparent and fair supplier rating.

3.6 Miscellaneous

- In July 2024, OLYMP signed the voluntary pledge on The Pilot on Employment Injury Scheme in the RMG sector of Bangladesh. The project's target group comprises industrial workers in Bangladesh. In cases of work-related injuries, the Pilot provides compensation payments for the permanently disabled and the dependents of deceased workers.
Further, the project fosters a social consensus on introducing an employment injury protection scheme in the country. It provides advice on policy design to the Ministry of labour and discusses the issue with an enlarged advisory body comprising government, employer and employee representatives to reach a consensus.
- In 2024, we have streamlined our purchasing departments. The OLYMP Bezner KG is now the only sourcing entity within the OLYMP group. All suppliers of the OLYMP Retail KG have been taken over by the OLYMP Bezner KG's sourcing teams.

4. OLYMP system for monitoring and remediation

Prior to entering a business relationship with OLYMP, business partners and production facilities commit to the following requirements:

1. Transparency

Transparency promotes accountability and is a crucial step towards a systemic change. Sharing relevant information enhances the efficiency and effectiveness of corporate responsibility and is hence the starting point in the business relationship with OLYMP.

a) Internal transparency

For all direct business partners, the disclosure of the supply chain from spinning to finishing is mandatory. Production facilities must be pre-approved by OLYMP prior to production and of sample processes.

b) External transparency

OLYMP discloses all production facilities of the assembling stage at OLYMP's website [here](#).

c) Unauthorized subcontracting

If a direct business partner transfers production processes, without informing and awaiting the approval of OLYMP, it is considered as "unauthorized subcontracting" because the subcontracted production facilities and workplaces are not formally part of our supply chain. Unauthorized subcontracting may lead in the worst case to the end of business relationship.

2. Social Monitoring

a) Fair Wear Code of Labour Practices

The Code of Labour Practices (CoLP) is the foundation for all work between factories and brands, and the first step in developing a commitment to improvement. This code contains a set of internationally accepted labour standards.

b) OLYMP iMPACT Program Audit

Production Facilities (CMT/assembling) are required to undergo a periodic monitoring to assess and ensure compliance with the Fair Wear Code of Labour Practices. We use our own audit system, the iMPACT Program, which is accepted by the Fair Wear.

OLYMP already sets the bar very high for its social monitoring. Our approaches and efforts to date have ensured a high and fundamentally stable level of social standards in our factories. Based on our rigorous monitoring system of audits, factory visits and local quality controllers as well as our long-standing partnerships, we have a comprehensive overview of the risks and challenges in our operations.

In essence, each production facility is given the chance to improve:

After an audit or visit has taken place, we share the audit report and remediation plans in a timely manner. After we have shared the report, the factory is requested to respond and propose improvement timelines. Worker representatives are invited to participate in closing meetings concerning the audit, but do not yet receive the audit reports and are not yet included in the follow up.

c) International Accord

OLYMP has participated in the Accord on Fire and Building Safety in Bangladesh and in all subsequent Accord agreements since 2013 and has signed the International Accord for Health and Safety in the Textile and Garment Industry since 2021. The accidents in Pakistan and Bangladesh in 2012 and 2013 laid bare the structural problems in some production countries in the textile industry in a tragic way – especially regarding deficiencies in building safety. As a reaction, the Accord on Fire and Building Safety in Bangladesh was initiated in May 2013. This has set itself the goal of effectively improving the safety of people working in Bangladesh's clothing industry. To this end, the Accord has set up a safety program that primarily considers the interest of workers. Since it was first signed in November 2013, OLYMP has also been involved in enforcing safe working conditions on the ground.

Production facilities in Bangladesh must undergo the safety inspections by the RSC and participate in the training courses and complaints mechanism. For factories that have not undergone any safety inspection by the RSC yet, OLYMP will initiate the inspection and training courses. For the progress made, please refer to the respective section.

Production Facilities in Pakistan: OLYMP is not active in Pakistan therefore, we have not signed the Pakistan Safety Program.

5. Supplier Pool 2024

Countries

In 2024, OLYMP was sourcing from the following countries: Albania, Bangladesh, China, Indonesia, India, Italy, Spain, Tunisia, Turkey, Vietnam.

Changes

- We ended our business relationship with two suppliers. One of them was a support process, who ended the business relationship by itself.
- In 2024, three business partners have started the onboarding process. One business partner, with two factories, has been included in the OLYMP supplier pool in 2024. Two factories failed the onboarding process.

When ending business relationships, we always adhere to the Fair Wear Responsible Exit Guideline. To this end, we have set up a responsible exit process internally.

Other

OLYMP does not maintain “external production”. This means that OLYMP does not resell any other brand except its own OLYMP, OLYMP SIGNATURE and MARVELIS brands.

6. Risk analysis at OLYMP

In the following sections, we will summarize the outcomes of our social risk analysis per country which we are sourcing from. We will elaborate on the potential country risks and the actual risks that we have identified based on audit reports and visits, and we will describe what we do to mitigate or prevent those risks.

We based our potential risk analysis on various external sources such as – but not limited to – the Fair Wear country studies¹, CSR Risk Check by MVO² and sources from the ILO such as country statistics, country programs, etc.³.

To identify actual risks, we focused on a mix of audit results such as the iMPACT Program, Fair Wear audits and others but also on our own factory visits and discussions with factories and their management teams.

The social risk analysis covers the following risks:

- Working hours
- (Living) wages
- Gender-based violence & sexual harassment
- Freedom of association & right to collective bargaining
- Occupational health & safety
- Discrimination
- Child labour & special protection of young workers
- Exploiting employment relationships incl. forced labour & all forms of slavery
- Unauthorized subcontracting
- Homework
- Corruption
- World governance indicators & transparency

6.1 Linking gender to human rights due diligence

It is important to recognize that employees of our suppliers are not a homogenous group. In addition to representing diverse socio-cultural settings, they hold diverse gender identities and sexual orientations.

Amidst such diversity, women are often among the most disadvantaged and discriminated ones. While exercising human rights due diligence, it is imperative that businesses adopt a “gender lens” to take these diverse identities into account.

The term “gender” covers a much broader spectrum than pursuing the rights of women and girls alone. However, we must acknowledge the fact that in most of our production countries LGBTQ+ is not an issue society is aware of or educated in. Therefore, we will apply the gender lens - in a first step - on women and girls only.

¹ <https://www.fairwear.org/programmes/countries>

² <https://www.mvorisicochecker.nl/en>

³ www.ilo.org

6.2 Transnational risks

We have identified four risks that are prevalent in almost all the countries where we are active. Therefore, we will give an insight on these risks at this point instead of repeating them in each country section:

- **Child Labour**

Child labour is a prevalent, structural problem in many garment and textile producing countries. Tailored estimations of child labour prevalence in the garment and textile sector are not available. However, worldwide, a total of approximately 160 million children from the age of five to 17 were engaged in child labour at the beginning of 2020. Of this, 79 million were performing hazardous work that risks their health, safety, or moral development ⁴.

Gender Lens: Girls are more often affected by child labor because boys are given priority in schooling. This makes girls more vulnerable to informal employment and homeworking.

Risks identified: Our risk analysis has not identified child labour or the protection of young workers as high transnational risk. All factories have policies on child labour including the protection of young workers. There are detailed hiring policies and procedures available. Furthermore, audits, certifications and CS visits have shown that the youngest workers in factories are at least 18 years old.

What we do: We continue to check on policies and processes with the help of the iMPACT Program audit and CS visits. In addition, and for the unlikely event of an occurrence of child labour, we have set up a Child Labour Emergency Procedure.

- **Working hours**

According to ILO Convention 1, 'workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate'.

However, the legal framework differs from country to country. Whereas the legally allowed working time in China is comparatively low, with a regular working week of 40 hours and in exceptional cases three overtime hours per day, thereby not exceeding 36 overtime hours per month. The regular working week in the Bangladesh textile industry is 48 hours and four overtime hours per day with no legal limit for monthly overtime.

Regardless of the legal framework, excessive overtime is a structural and prevalent risk in most of our production countries. And excessive overtime does not only violate the right to decent working hours itself but also denies workers' rights to a safe and healthy workplace. The more excessive overtime hours are worked, the higher the chance of accidents in the workplace. Fatigue will lead to other health and wellbeing related issues. It also negatively impacts worker performance and productivity.

On the other hand, workers are often in favor of working (excessive) overtime to earn a higher income, as their base wages fall below most living wage benchmarks. In some countries there may also be a cultural dimension to overtime. For example, migrant workers prefer to work overtime hours to be able to send as much money home as possible. As overtime shall be paid with a premium rate, this gives even more incentive to work overtime.

⁴ ILO and UNICEF. 2021. 'Child Labour.Global estimates 2020. Trends and the way forward'.

https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_797515.pdf, p.

There are many more root causes for overtime reaching from planning issues to a lack of organizational capacities to the legal framework accompanying a business relationship. Sometimes suppliers overbook capacities or do not reserve them as per the forecast. Sometimes there are unrealistic delivery requests from customers, or late approvals/order placements.

For many years we have been discussing root causes with our production facilities. Here, factories report unauthorized absenteeism of workers resulting in a lack of workforce, malfunctioning of machinery and poor infrastructure as main reasons for excessive overtime. Furthermore, it is also reported that workers demand overtime to some extent, so that overtime hours are included in the planning system and lead to excessive overtime if actual overtime is needed.

Remediation thus takes a lot of time and, considering the various stakeholders it includes, the overtime findings cannot be resolved by a single brand alone.

Gender Implication: Managers pass the brunt of unrealistic delivery targets down to the lowest paid employees, which are predominantly women. Overtime is often involuntary, not recorded and not paid in full. Further, women have a double burden as they usually bear the brunt for work at home.

What we do: In the past, audits have been the major tool in the industry to monitor production facilities. For many brands the aim was an easy result. Production facilities that had excessive overtime, received a bad mark in the audit, and brands delisted those facilities out of their supplier pool. This in turn led to the fact that many production facilities started to hide their actual working hours during audits instead of being honest with customers on challenges caused by different circumstances.

We want to change this with the approach of our iMPACT Program. The ultimate goal is sustainable improvement. Knowing the actual situation at the production site is key when identifying suitable improvement measures. To that end, facilities are encouraged to be fully transparent and discuss problems openly. Auditors also assess the transparency of the factory because only if we know the real working hours, we can verify their correct payment. Where we have hints of non-transparency, we go into dialogue with the factories. Here, we have already made good progress in the last year. Yet, for many production facilities this transparency approach is new, so in a first step we try to create trust in us to be transparent in reporting overtime. To be able to (re-)mediate excessive overtime, a detailed root cause analysis per factory is required. This is a long-term project and can only be resolved when working on wages as well.

To get a detailed insight into the working hours of a whole factory, our shirt production facilities report their overtime hours monthly and per each department. These reports show that excessive overtime occurs but is mostly not widespread. In particular, the finishing (packing) department is prone to do overtime but even then, only few workers are affected rather than all. In 2025, we will include factories with high risk for excessive overtime into the monthly reporting. The complete roll out of this reporting will equally be assessed in 2025.

Furthermore, individual production lines are permanently and exclusively blocked for OLYMP production solemnly in every shirt factory. As a concession to the business partner, production facilities have benefitted from far-sighted production planning, and as far as possible, from homogeneous capacity utilization to avoid excessive above-capacity and below-capacity employment phases.

Regarding gender impacts, audits and CS visits show The OLYMP Code of Conduct only allows overtime on a voluntary basis and within legal limits. Audits and CS visits show that overtime is recorded correctly by all employees and paid at a premium rate.

- **Payment of living wage, freedom of association & the right to collective bargaining**

The UN Economic, Social and Cultural Rights Covenant states that workers' wages should deliver a decent living for themselves and their families', while the UN's Universal Declaration of Human Rights calls for wages that ensure 'an existence worthy of human dignity.'

There is a high risk of non-payment of a living wage in all production countries.

But living wages are also linked to other risks. In some of our production countries, freedom of association and the right to bargain collectively is limited by law or in practice, or both. Garment workers' wage levels are rarely set by way of collective bargaining. Yet, without credible wage negotiations, wages rarely meet workers' basic needs.

Over the last years, the payment of the minimum wage throughout the production facilities was not a high risk. Yet, the pandemic laid bare weaknesses in the globalized world. The textile industry with its international supply chains was particularly affected. As a result of the pandemic, demand and therefore, the order volume for textiles collapsed worldwide, even leading to the complete cancellation of orders by manufacturing companies and lowering of wages. At OLYMP, we did not withdraw any orders or withhold any payments during the pandemic. But at some production facilities we were one of the few remaining customers. This challenging situation increased the risk for breaching minimum wages, incorrect maternity benefit calculation, etc.

Moreover, legal gender-based discrimination, unequal wage rates and job segregation based on gender have combined to create deep-seated practices that have resulted in women being paid less than men for the same and comparable work, or work of equal value, and in women's confinement to lower paid jobs with fewer opportunities for promotion.

Gender Lens: Women are more likely to be employed in the lowest paid jobs. They often earn less than men in the same position. They often receive fewer bonuses and maternity leave benefits are often denied. Women are more vulnerable to illegal deductions from wages when they are pregnant or sick. They do not have full freedom of choice over the income they earn themselves. Women often do not have their own bank account.

What we do: the iIMPACT Program incorporates a wage ladder that allows for a comparison of facility wages against legal minimum wages. Furthermore, it contains an evaluation if a facility has started its own living wage program, including initial stocktaking of wage levels as well as an analysis of wage information for main job categories. This includes also a gender assessment regarding wages and job categories.

Furthermore, the iIMPACT Program contains an in-depth analysis of existing union structures and union election processes, a detailed overview of collective bargaining agreements in place at facilities and an evaluation of implementation of the Fair Wear Grievance Mechanism.

As a starting point, we provided guidance to a master's thesis about "Recommendations for introducing living wages at OLYMP". As we currently gather a lot of data but are missing action, the paper provides groundwork on the next steps. Therefore, we are in regular meetings with other Brands to exchange best practices and find common solutions for implementing living wages in the supply chain. In the end of 2024, our management has approved a living wage initiative with a pilot factory as part of our Sustainability Strategy 2030, which will start to implement in 2025. The aim for OLYMP is to pay its share of the living wage a one pilot factory in Indonesia.

Regarding gender impacts, audits and CS visits show that maternity benefit is being paid correctly. Audits and CS visits show that there are no illegal or disciplinary deductions. Conversations with management indicate that all workers have their own bank accounts.

- **Safe and healthy working conditions**

The strength of a thorough social audit lies in evaluating management systems and assessing the implementation of labour rights within a production facility. Serious audits reveal business structures (including relevant business partners and subcontracted support processes) and allow inspections of all records (including accurate and complete payroll and timecard records, production documents, etc.).

These audits provide access to workers for confidential and candid onsite interviews and our anonymous Worker Sentiment Survey provides supplementary data points by highlighting risks and high priority issues from workers' perspective.

Most social audits can identify visible and easily correctable aspects such as missing fire extinguishers, blocked escape routes, lack of air circulation, insufficient light, etc.

However, due to the limited time onsite and especially the expertise required, a social audit will not be able to cover the health and safety topics in depth.

Due to our longstanding engagement with the Bangladesh and International Accord, we have gained a lot of experience regarding safe and healthy working conditions. We have used this knowledge when visiting production facilities in other countries and assessed their safety level as well. Thereby, we observed that the four focus areas of the International Accord are not only major risks in Bangladesh but across all our production countries:

- **Building safety**

This risk is especially crucial if production buildings have more than one floor and/or if steel buildings are onsite. Preventive and remedial actions in this area are very complex and costly.

- **Electrical safety**

Acting in this area means taking preventive measures regarding fire safety as 70 % of fires originate from lacking electrical safety. Generally, preventive and remedial actions in this area are comparatively simple and cost-efficient. Still, a high expertise of electrical engineering is required to detect electrical risks and to maintain electrical safety within a production facility.

- **Fire safety**

Textile and garment factories are prone to fires as there are many combustible materials stored in proximity. Preventive and remedial actions in this area are very complex and costly.

- **Boiler safety**

Boilers that have not been produced, installed and maintained to international boiler standards constitute a potential life and property hazard. Preventive and remedial actions in this area are very complex and costly.

All these risks have a very high severity as many people may be affected and an accident may lead in the worst case to a loss of lives as the Rana Plaza collapse and fire at Ali Enterprise have shown.

To identify the actual risks and remediate or even prevent these risks, the engagement and expertise of studied engineers is required. The Bangladesh Accord has demonstrated this in 2018 when the Accord on Fire and Building Safety in Bangladesh commenced a pilot program to conduct 35 boiler safety inspections at 17 Accord-covered RMG factories. Contracted, international boiler inspectors from TUV-SUD (Germany) were dispatched for inspections. A group of five Accord engineers were trained by and shadowed the TUV-SUD engineers during the inspections as part of an Accord engineers' training program.

Gender Lense: Women face more health and safety risks than men. They often lack access to safety training, personal protective equipment, clean toilets, and clean drinking water, etc. Women often suffer more from unhygienic conditions (e.g. when breastfeeding, storing milk, etc.). When faced with harassment or violence, women find it difficult to receive medical help and/or psychological support.

What we do at OLYMP: At OLYMP we support industry initiatives such as the International Accord and its expansion to other production countries. Unfortunately, the international expansion precedes slowly for various reasons. Therefore, we are currently considering ways of setting up our own prevention program regarding Electrical Safety.

With the iMPACT Program we also put an additional focus on safety risks by gathering various information on building set ups, electrical maintenance status, etc. As a result of these previous efforts, the top management has approved an occupational health and safety project during the sustainability strategy 2030. The project is inspired by the International Accord and aims at implementing at least a basic standard within Tier 1 production facilities regarding building, fire, electrical and boiler safety. The project will be accompanied by a third party.

Regarding gender impacts, audits and CS visits show that there are sufficient toilets and drinking stations for women. Women participate equally in safety trainings. In addition, we are working on update of our iMPACT Program audit to make it even more gender sensitive.

6.3 Country & factory risks

6.3.1 ALBANIA

We have been sourcing from one factory in Albania since 2018:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Blue Sky sh.p.k.	CMT	Trousers	2018	203	12.04.2023 iMPACT Program

RISK ANALYSIS

Our risk analysis has shown that Albania is one of the medium risk countries in our supply chain, scoring 3.2 on a scale of 1-5 (1 being the lowest).

The major risks identified are the transnational risks, such as the "payment of a living wage" as well as "safe and healthy working conditions", as described in the previous chapter.

It does not mean that there is no risk regarding other labour standards but there is either less severity, or no actual risk has been identified yet.

MONITORING ACTIVITIES

In 2024 we have not conducted any iMPACT Program Audit at the factory.

In 2024, we did not visit the factory. The reason is that the actual risk is comparatively low in the country, the audit results have always been very good and there were no complaints from this factory so far.

6.3.2 BANGLADESH

In Bangladesh we have sourced from seven different factories in 2024:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Eco Fab Ltd.	CMT	Shirts	2016	1,700	20.11.2024 iMPACT Program
Square Apparels Ltd.	CMT	Shirts	2023	2,000	STeP
Square Fashions Ltd.	CMT	Jersey	2025	13,000	STeP
Best Wool Sweaters Ltd.	CMT	Knit	2013	3,000	other audit in 2024
Blue Planet	CMT	Underwear	2021	1,200	08.01.2023 iMPACT Program
Dhaka Garments & Washing	Support process	Laundry	2020	2100	STeP
LMS	Support Process	Warehouse	2018	10	

RISK ANALYSIS

Our risk analysis has shown that Bangladesh is one of the medium risk countries in our supply chain, scoring 3.9 on a scale of 1-5 (1 being the lowest):

- Freedom of association and the right to collective bargaining**

Trade unions are hardly allowed in the garment sector in Bangladesh. There is a suspension of trade union rights under the state of emergency, which inhibits legal provisions. Additionally, there is a bureaucratic process to form unions, and employers' uncooperative attitudes contribute to a lower level of participation of trade unions in this sector.

Risks identified: There are no trade unions active in our factories. However, all of them do have democratically elected worker representation and have set up an internal grievance mechanism.

What we do: As all factories are covered by the International Accord/RSC, the creation of a complaints mechanism is an essential part of the International Accord. Employees and their representatives have the right to refuse to work under dangerous conditions and to make a complaint about safety in the workplace through the Accord's complaints mechanism. There has been one complaint via the Accord/RSC complaint mechanism. Please refer to the section 'Complaints Handling' for more information.

Furthermore, training for the workforces and establishment of a safety committee in the factories have been fostered. Joint safety committees of employees and employers have been set up.

- **No discrimination in employment**

Almost 80 % of the workers in the Bangladesh textile and garment industry are women. Due to the socio-cultural characteristics of the country, discrimination cannot be ruled out and represents a high risk, especially for women. Women are especially underrepresented in leadership positions.

Risks identified: In Bangladesh 39 % of our factories' workforce is female but only 9 % are female leaders or in supervisor positions.

Furthermore, worker sentiment surveys have shown a high risk for verbal abuse.

What we do: Two factories are running a leadership program to increase and promote female leadership.

Four factories have an Anti-Harassment Committee established.

- **Payment of a living wage**

Risks identified: The minimum wage depends on the designation (skill level) of a worker. It was found that workers did not have the right designation, and, in some cases, the maternity benefit calculation was wrong.

What we do: We have rectified the wrong designations and the maternity calculation together with the respective factories.

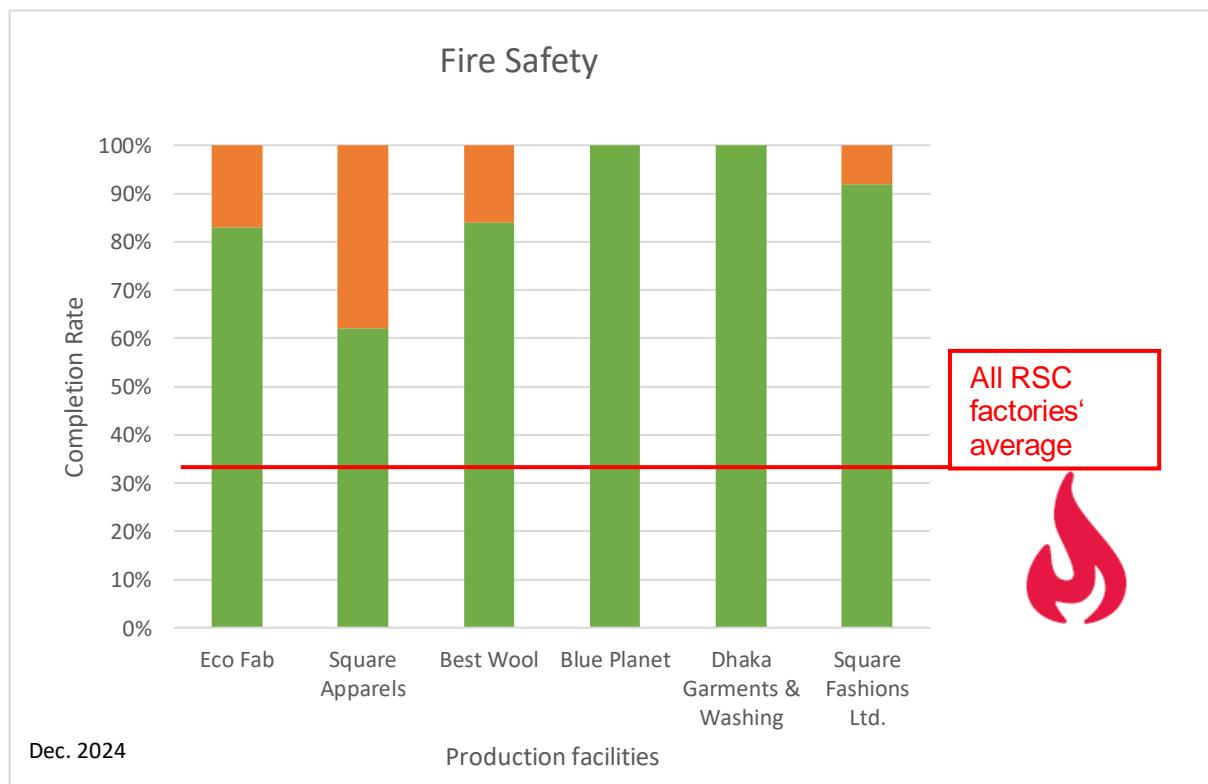
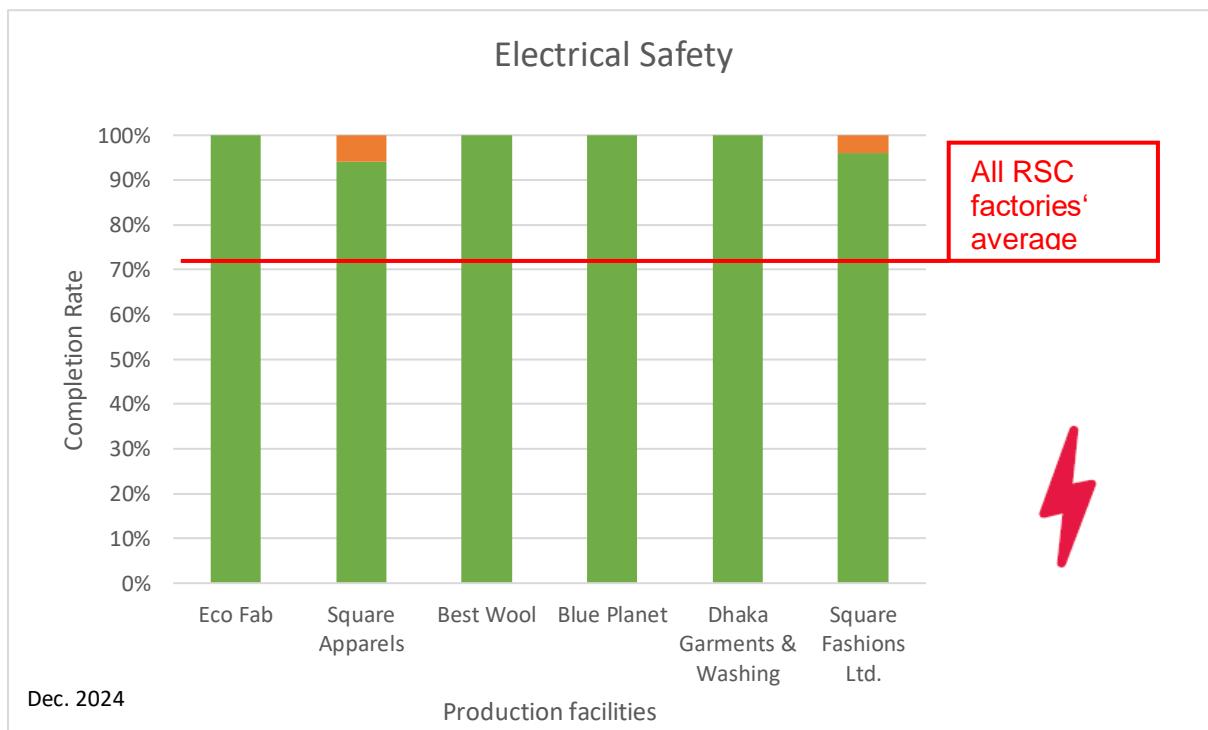
- **Safe & healthy working conditions**

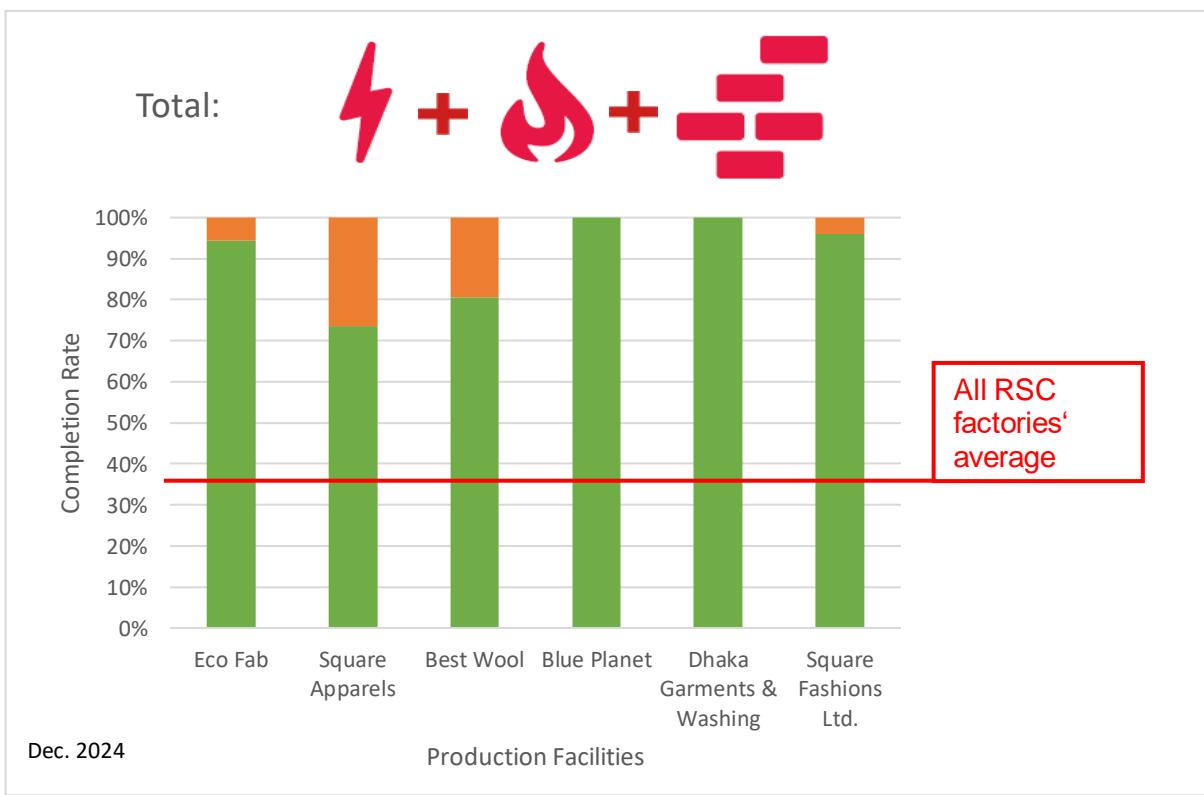
All OLYMP production facilities are implementing the Accord's measures completely (based on the initial findings), one is not in the scope of the International Accord/RSC. Five factories have completed the training program, have a well-trained safety committee with employee participation and a complaints mechanism. The results of our factories' Accord's audits were largely positive. In the best case even to 100 percent have been achieved. This is measured by the deficiencies identified during the initial inspections, which have since been reported as rectified or verified. As some factories have extended their current building set up, some progress has slowed down as the building extensions are equally part of the Accord scope and are assessed in the overview below. Further, complete remediation of items by the factories is often difficult because the initial fire safety items (Fire Alarm and Detection System-FADS & Suppression System-SUPS) pose a great challenge for the factories.

There is only one factory in the first stage of escalation due to slow progress. However, it is likely that the RSC will lift the escalation as the production facility has made progress in the remediation over the last months.

In 2023 the International Accord introduced a new inspection area – boiler safety. There is no factory related overview yet.

Levels achieved by OLYMP production partners in Bangladesh during implementation of the Accord:





MONITORING ACTIVITIES

In the last year, OLYMP CS has not travelled to Bangladesh. One social monitoring audit has taken place, and we plan three iMPACT Program audits for the upcoming financial year.

In addition, we have a local quality team consisting of 25 people (3 heads and 22 QCs) onsite and our travel technicians spend almost 50 % of their time in the factories. For this reason, we can exclude major risks such as child labour, unauthorized subcontracting, etc.

6.3.3 CHINA

Since 2005 we have been sourcing from factories located in China. In 2024 eight factories were active in this country:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Lu Thai Textile. Co., Ltd.	CMT	Shirts	2005	8,500	11.12.2023 iIMPACT Program
Exquisite Knitters (Guangzhou) Ltd.	CMT	Jersey	2005	300	13.03.2024 iIMPACT Program
Neo-Concept Fashion (Zhongshan) Co., Ltd.	CMT	Jersey	2018	500	23.10.2024 iIMPACT Program
Neo-Concept (Jiaxing) Co., Ltd.	CMT	Knit	2019	150	04.11.2024 iIMPACT Program
Dongguan Bacui Knitwear Co., Ltd.	CMT	Knit	2013	1,000	09.04.2024 iIMPACT Program
Zhejiang Babei Necktie Weaving Co., Ltd.	CMT	Accessories	2006	60	10.05.2024 iIMPACT Program
Dongguan Quijun Ribbons Co., Ltd.	CMT	Accessories	2018	20	27.07.2022 iIMPACT Program
Shengzhou Jialan Garments & Apparel Co., Ltd.	CMT	Accessories	2017	140	04.07.2023 iIMPACT Program

RISK ANALYSIS

Our risk analysis has shown that China is a high-risk country in our supply chain, scoring 4.1 on a scale of 1-5 (1 being the lowest).

Almost all eight Fair Wear labour standards are at risk in the country and their remediation is quite difficult. This owes to the fact that in China the government often regulates breaches of labour and human rights violations, whereas in other countries the factory management may be the perpetrator. Where there is the interference of any government, brands have only little leverage to remediate labour and human rights violations.

- Employment is freely chosen**

Stakeholders see a risk for forced labour which steadily increased over the past years, especially for minority groups.

Risk identified: There has been no indication for a breach of this labour standard. However, there is no guarantee, as identifying forced labour is not only very difficult but a very sensitive issue.

What we do: We work with stakeholders to enquire on this labour standard further, but it requires sensitivity due to the political framework and, above all, it must ensure the protection of the stakeholders involved.

The ban on cotton from the Chinese Xinjiang Uyghur Autonomous region (XUAR), as well as from Uzbekistan and Turkmenistan is an integral part of our sourcing strategy. Besides that, we have stopped the onboarding of new suppliers in China. In addition, we extended the ban for complete the XUAR region.

To verify the cotton origin, we have set up a risk analysis to decide on the suppliers and products to be tested. The implementation will start in 2025.

- **Freedom of association and the right to collective bargaining**

The ACFTU is the sole trade union body recognized in China, and it is part of the government hierarchy. There is no comprehensive national law on collective bargaining procedures but rather a plethora of regulations, paraphrased as “collective contracts”. The right to strike is highly limited.

Risks identified: All factories do have a democratically elected worker representation. Some do have trade union activities and collective bargaining agreements, and all have a complaints mechanism in place.

However, due to the above-mentioned legal set up, the functionality of all these activities is uncertain. In addition, some grievance mechanisms do not have a single complaint, which makes their functionality equally doubtful.

What we do: In the end of 2024, the OLYMP top management has approved the OLYMP sustainability strategy. Part of this is the project “Working conditions in the supply chain”. The project will define an OLYMP standards for complaints mechanisms and social dialogue within the supply chain.

- **No discrimination in employment**

According to stakeholders, there is a high gender bias in the country. Even though women are often well educated there is a high gender pay gap.

Risks identified: N/A

- **A legally binding employment relationship**

see ,Employment is freely chosen ‘.

- **Payment of a living wage**

Risks identified: Social compliance audits in China have regular findings regarding social security benefit payments. From discussions with our business partners, it became obvious that social security is a very challenging and difficult issue.

What we do: We have set up a guideline for our factories regarding social security. In it, we explain the regulation and recommend awareness raising training courses (incl. Chinese video recommendation) for the workers.

MONITORING ACTIVITIES

In the financial year 2024, five iMPACT Program audits have taken place. For the next year, we are planning with one iMPACT Program audit as the current audit's validity will expire.

In 2024, no factory has been visited. For the next year, we are planning further visits.

6.3.4 INDONESIA

In Indonesia we source from three factories:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
PT. Metro Garmin	CMT	Shirt	1989	2,600	16.01.2024 iMPACT Program
CV.Perintis Putra Bangsa	Support Process	Laundry	2009	40	02.09.2024 iMPACT Program
PT. Rapisarana Texpro	Support Process	Laundry	2023	300	09.11.2024 iMPACT Program

RISK ANALYSIS

Our risk analysis has shown that Indonesia is one of the medium risk countries in our supply chain, scoring 3.6 on a scale of 1-5 (1 being the lowest). Besides the transnational risks, the following labour standards are at risk:

- Freedom of association & the right to collective bargaining**

Trade unions are generally widespread in the country but access for workers is limited, especially in the textile industry. There are only a few collective bargaining agreements and stakeholders consider especially the quality of those agreements as poor.

Risks identified: no risks identified.

What we do: In the end of 2024, the OLYMP top management has approved the OLYMP sustainability strategy 2030. Part of this is the project “Working conditions in the supply chain”. The project will define OLYMP’s standards for complaints mechanisms and social dialogue within the supply chain. The project is likely to start in end of 2025 and will continue in 2026.

- Payment of a living wage**

The minimum wage is determined by the regional governor of the respective district. However, due to the impact of the pandemic, the government allows special arrangements regarding the minimum wage. This means that it is accepted by law that labour-intensive industries that are economically affected by the pandemic are allowed to adjust on the minimum wage according to a mutual agreement between the company and a trade union.

Risks identified: The order quantity from all customers at the factory is now almost half of the normal capacity compared to pre-pandemic levels. Many customers have not returned to the factory, so that two factory units were still closed. OLYMP has been one of the few remaining customers at the factory. Under these circumstances the factory management and the labour union agreed to apply the minimum wage which is approx. 5 % less than the minimum wage declared by the governor. From the beginning of 2024, the factory will apply the regional minimum wage.

What we do: The minimum wage has been implemented in the beginning of 2024. Further, as part of the sustainability strategy 2030, we will start a living wage initiative in Indonesia.

- **Gender-based violence & sexual harassment**

Stakeholder data shows that up to 11 % of Indonesian women have already suffered from sexual, physical, mental or economic violence⁵.

Risks identified: N/A

What we do: N/A

MONITORING ACTIVITIES

GOTS and STeP audits have taken place at the production facilities.

6.3.5 INDIA

In 2023 we have sourced from six factories in India.

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
SABS Exports	CMT	Jersey	2012	500	15.03.2024 iMPACT Program
SABS Exports C	Support process	Printing		60	27.02.2024 CS visit
SABS Exports B	Support process	Dyeing		60	26.02.2024 CS visit
Warsaw International	CMT	Jersey	2020	80	04.01.2022 iMPACT Program
Seffectzs	Support Process	Laundry		40	
Growmore International Ltd.	CMT	Accessories	2017	170	15.04.2021 SA8000 certificate 21.08.2024 CS visit

RISK ANALYSIS

Our risk analysis has shown that India is one of the high-risk countries in our supply chain, scoring 4.1 on a scale of 1-5 (1 being the lowest).

Besides the transnational risks, the following labour standards are at risk:

⁵ [Country Detail Page | UN Women Data Hub](#)

- Grievance Mechanism

Every production facility is required to establish or participate in an effective operational-level grievance mechanism (=factory level) for individuals and communities who may be adversely impacted and maintain accurate records.

Risks identified: All factories have set up an internal grievance mechanism and processes. Yet, the Worker Sentiment Surveys show that most workers are not willing to speak up or do not trust the existing grievance channels.

What we do: As a member of Fair Wear, we participate in Fair Wear's complaints system. It does not replace a factory's own internal grievance mechanism but rather acts as a safety net when all other options fail or are not trusted by workers. Fair Wear provides worker information sheets containing the Code of Labour Practices for distribution to suppliers. We distribute those information sheets to workers during iMPACT Program audits and during our visits.

In the end of 2024, the OLYMP top management has approved the OLYMP sustainability strategy 2030. Part of this is the project "Working conditions in the supply chain". The project will define an OLYMP standards for complaints mechanisms and social dialogue within the supply chain.

MONITORING ACTIVITIES

Two support process facilities have been visited by CS for the Chemicals Management Audit. The Chemicals Management was developed for wet-and vertical-processing facilities (e.g. dyeing, washing, finishing), given that this area involves the greatest input of chemicals. However, it can also be useful for other production processes in which chemicals are used. It aims at improving the chemical management according to the ZDHC in the production: chemicals management, input management, handling of chemicals and output management. The remediation of all kinds of audits is still ongoing.

6.3.6 ITALY

In Italy we source from one factory:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
BBC Jacquard Srl	CMT	Accessories	2024	25	Low risk

RISK ANALYSIS

Our risk analysis has shown that there is a quite small risk in the country, scoring 1.6 on a scale of 1-5 (1 being the lowest). As an EU-member state, the country already fulfils a high legal standard. However, the transnational risks like living wage and health and safety may be at risk.

MONITORING ACTIVITIES

We have not visited the factory this year as there is a comparatively low risk in the country and there were no complaints from this factory so far.

6.3.7 SPAIN

In Spain we source from one factory:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
FUS Balear Diseny S.L.	CMT	Accessories	2019	3	Low risk

RISK ANALYSIS

Our risk analysis has shown that there is a quite small risk in the country, scoring 1.7 on a scale of 1-5 (1 being the lowest). As an EU-member state, the country already fulfils a high legal standard. However, the transnational risks like living wage and health and safety may be at risk.

MONITORING ACTIVITIES

We have not visited the factory this year as there is a comparatively low risk in the country and there were no complaints from this factory so far.

6.3.8 TUNISIA

In 2024, we sourced from two factories in Tunisia:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Janssen Tunesie SARL	CMT	Trousers	2004	450	30.11.2023 iIMPACT Program
GARTEX SARL	CMT	Trousers	2004	880	27.11.2023 iIMPACT Program

RISK ANALYSIS

There is good and progressive legislation in many areas which reduces the potential risk in the country. The countries score is 3.1 on a risk scale 1-5 (1 being the lowest).

Risks identified: Most risks identified were regarding “Safe and Healthy Working Conditions”. Furthermore, the management was missing basic management systems. There were no policies available.

What we do: We have been in constant communication with the factory to remediate the health and safety risks. The factory has further improved its management systems and policies. For more information, please refer to the chapter 6.2. transnational risks.

MONITORING ACTIVITIES

We are in constant communication with the factory. The factories have been visited in 2024. Both factories have been audited with the iIMPACT Program audit in 2023 showing good progress since the last audit.

6.3.9 TURKEY

In Turkey we source from one factory:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Imren Deri Mamulleri San. Ve. Tic. Ltd. Sti.	CMT	Accessories	2019	50	21.03.2023 iMPACT Program

RISK ANALYSIS

The risk analysis has classified Turkey as one of the high-risk countries, scoring 3.8 on a scale 1-5 (1 being the lowest). Besides the transnational risks, the following risks have been identified:

Risks identified:

- Payment of a living wage

No living wage is paid; however, the payment of the statutory minimum wage could be verified during the audit.

- Grievance mechanism

All factories do have an existing grievance mechanism; however, the worker sentiment survey shows that a worker does not think that their suggestion or complaint will be treated seriously.

- Migrant Workers

What we do: We are in constant communication with the factories to remediate the findings from audits and visits.

MONITORING ACTIVITIES

In 2024, we have not conducted one iMPACT Program audit, and no production facility has been visited in the last year.

We are currently considering a travel plan for Turkey.

6.3.10 VIETNAM

We source from five factories in Vietnam:

Factory Name	Factory Type	Product Type	Business Relationship since	Total Workers	Last audit
Protrade Garment Co., Ltd.	CMT	Shirt	2007	2,000	14.08.2023 iMPACT Program 06.11.2024 CS visit & Fair Wear Training
Phat Dat Embroider	Support Process	Embroidery			07.11.2024 CS Visit
Phu Thuan JSC	Support Process	Printing		30	
KY Manufacturing Co. Ltd.	CMT	Accessories	2003	100	30.08.2022 iMPACT Program

RISK ANALYSIS

Vietnam is one of the medium risk countries, scoring 3.4 on a scale 1-5 (1 being the lowest). A major issue is regarding Freedom of Association and the Right to Collective Bargaining. As there is only one national trade union organization in Vietnam - the Vietnam General Confederation of Labour (VGCL) - statistics on unionized workers and factories do not represent applicable representation of freedom of association. According to recent empirical studies on social dialogue in the manufacturing sector, genuine labour-management dialogue and effective grievance handling are rare. While collective bargaining often results in more favorable terms and conditions for workers, implementation of the resulting agreements remains problematic in many factories.

Risks identified: We have mainly identified the transnational risks Payment of a Living Wage and Safe and Healthy Working Conditions.

What we do: Please refer to the previous section for the transnational risks.

MONITORING ACTIVITIES

In 2024, we have visited two active factories and three potential factories. At one of the existing factories, the Fair Wear training on "communication" has taken place since May 2024.

7. Complaints handling

There are various complaints channels for suppliers and stakeholders:

1. Complaint mechanism within the framework of the Fair Wear Foundation

When garment workers feel that their rights are being violated or when others see this happen, they can file a complaint via the Fair Wear complaint mechanism. This is done through a complaints handler. The complaints handler speaks the local language, which allows workers to comfortably and effectively voice their concerns. When a complaint is filed, Fair Wear immediately informs the member brand(s) and launches an investigation. If the investigation shows that the complaint is grounded — i.e. evidence was found in support of the complaint — Fair Wear requires the member brand to work together with the factory to fix the problem.

During iMPACT Program audits and factory visits we distribute Worker Information Cards to workers to inform them about the Fair Wear complaints mechanism.

a. Complaints via the Fair Wear complaints mechanism

In 2024, no complaint was filed via the Fair Wear grievance mechanism.

2. Creation of a complaints mechanism within the framework of the International Accord

Employees and their representatives have the right to refuse to work under dangerous conditions and to make a complaint about safety in the workplace through the Accord's complaints mechanism.

The RSC team trains the workers on this complaint mechanism on a regular basis.

a. Complaints via the International Accord complaint mechanism

In 2024, no complaint has been filed via the International Accord complaints mechanism in Bangladesh.

3. Complaints via the email address responsibility@olymp.com

We provide information on our website and in our Responsible Business Conduct Policy about the complaints mechanism. There were no complaints in 2024 via this channel.

7.1 Activities to inform staff members

In general, all new colleagues receive an introduction to OLYMP's sustainability efforts. Based on their future job roles, they will get specialized training on our social and environmental monitoring as well as our Green Choice strategy. In the social monitoring sessions, these colleagues are provided with information on the Fair Wear membership, our social monitoring activities and requirements for production facilities.

Furthermore, we have set up regular meetings with the purchasing departments to discuss about suppliers individually.

If there are new developments that need to be addressed, we send information letters or set up calls – depending on the urgency and complexity.

Identifying risks requires not only theoretical but also practical knowledge. Therefore, we have organized and conducted – together with eight other brands – a two-day training course for auditing skills.

The training covered the following topics:

- Understanding communication challenges with audits
- Identifying red flags
- Opening & closing meetings
- First encounters and investigating issues
- Interview techniques
- Findings and getting corrections

During the training, we also conducted several role plays. The role plays demonstrated the exemplary assessing of typical findings such as Freedom of Association, Unpaid Wages, etc.

It was two intense days, but it was worthwhile for all participants.

7.2 Activities to inform agents

In 2024, there was no extraordinary communication with our agents.

7.3 Activities to inform manufacturers and workers

Please refer to the respective countries.

8. Stakeholder engagement

We interact with other social groups for example via our membership of trade associations, currently Südwesttextil e. V., GermanFashion Modeverband Deutschland e. V. and Außenhandelsvereinigung des Deutschen Einzelhandels e. V. (AVE).

As a member of the Fair Wear Foundation, we can rely on a great network of national and international stakeholders and their knowledge. Especially the Fair Wear country studies and webinars build an important basis for our risk assessments.

The case Orljava d.o.o. (Croatia)

In 2021, our business relationship with our long-term business partner Orljava d.o.o. ended after more than 50 years. In this time, OLYMP was always a fair and reliable partner. We ensured reliable planning, continued capacity utilization as well as fair and reliable payment. Deliveries have never been paid incompletely or late in all the years of cooperation, but on the contrary, were regularly pre-financed throughout the years of cooperation.

The Croatian state as owner of Orljava started discussions on the privatization of Orljava and this status went on for years. However, a buyer could not be found and from our perspective a suitable prospect was actively rejected for reasons unknown to us. The business' continued existence was regularly questioned by the management and the Croatian state as owner. Owing to this state of uncertainty, long overdue investments were constantly postponed and urgently needed innovations failed to materialize. Offers by OLYMP to increase efficiency or to optimize production processes were not accepted to the required extent, which is why reliable annual and production planning could no longer be guaranteed.

After years of inconclusive dialogue, OLYMP finally took the inevitable decision to end the business relationship in compliance with the contractually stipulated notice period and in a transparent exchange. OLYMP did not make this decision lightheartedly. Even after the official end of business relations, we stayed in contact and tried to find solutions to continue or re-establish cooperation. We engaged in a dialogue with unions, the workers council and NGOs but unfortunately those meetings were not constructive.

OLYMP was no party in the insolvency proceedings. Yet, as part of our duty of care we were trying to follow up on the insolvency procedure of the factory as closely as possible. We were in dialogue with the state appointed insolvency administrator and commissioned an examination of the court documents through a Croatian law firm. We have also been in contact with the trade unions Novi Sindikat TOKG and IndustriALL Europe as well as the Croatian government and Clean Clothes Campaign.

Finally, on March 2nd, 2023, the Government of the Republic of Croatia adopted a decision whereby the state will take over the established outstanding claims of the employees of the textile company Orljava in bankruptcy, as they are bankruptcy creditors of the first higher payment order, up to a maximum amount of 491.1 thousand Euros.

The application of this decision entered into force on the day of its publication and was carried out by the state ownership body - Centre for Privatization and Restructuring (CERP). IndustriALL Europe confirmed the payment to all former employees of Orljava.

However, in October 2023 the Clean Clothes Campaign and Novi Sindikat filed a complaint at the German OECD National Contact Point regarding an alleged violation of the OECD Guidelines for Multinational Enterprises. In August 2024, the OECD contact point has completed the initial assessment and suggested for a mediation process. We have agreed to it and are currently awaiting further instructions.

DISCLAIMER

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