



Brand Performance Check

Nudie Jeans Co.

This report covers the evaluation period 01-01-2025 to 31-12-2025

About the Brand Performance Check

Fair Wear's Brand Performance Check is a tool to annually evaluate and publicly report on the Human Rights Due Diligence (HRDD) efforts of the companies for which Fair Wear facilitates the implementation of HRDD. These efforts are assessed based on the standard that Fair Wear sets, which in turn is based on the OECD guidelines for business and human rights in the garment and footwear sector.

For the Brand Performance Check, Fair Wear focuses on the assembly stage of garment and textile production (i.e., Cut-Make-Trim factories and their supporting processes). Importantly, this focus does not entail a direct assessment of factories, but serves to evaluate how Fair Wear's affiliated companies translate their HRDD commitments into concrete practices and outcomes at factory level, vis-à-vis their suppliers.

During a Brand Performance Check, Fair Wear evaluates to what extent companies have integrated human rights due diligence into their core business practices and evaluates to what extent the practices of member companies support the Fair Wear Code of Labour Practices (CoLP) by scoring companies against a set of indicators. Based on this process, each company is assigned a benchmarking score and a corresponding category: Leader, Good or Needs Improvement. Each Brand Performance Check report is published online for transparency and accountability. Through these reports, Fair Wear member brands demonstrate the changes that are possible. For more information on the scope and indicators of the Brand Performance Check, [please see the Brand Performance Check Guide](#).

Based on their Brand Performance Check, brands are placed into a category that corresponds with their performance. Categories are calculated based on a combination of benchmarking scores. The specific requirements for each category are outlined in the Brand Performance Check Guide. The categories are as follows:

Performance Check categories:

Leader:

The **Leader** score signifies that a company has scored exceptionally well on the Brand Performance Check indicators. It could show it has comprehensive processes in place for Human Rights Due Diligence and made strong, demonstrable efforts to engage in prevention and remediation of (potential) harms.

Good:

The **Good** score signifies that a company has scored well on the Brand Performance Check indicators. It could show it has appropriate processes in place for Human Rights Due Diligence and made demonstrable efforts to engage in prevention and remediation of (potential) harms.

Needs Improvement:

The **Needs Improvement** score signifies that a company has not been able to demonstrate sufficient evidence of improvement on requirements from the previous Brand Performance Check or that it has not yet demonstrated sufficient efforts on the overall Brand Performance Check indicators.

Disclaimer:

Brands receiving a Brand Performance Check have committed to work in accordance with Fair Wear's policies based on international standards, such as the UNGP's and the OECD Guidance for Responsible Supply Chains in the Garment and Footwear Sector, with the goal of achieving a positive impact on the working conditions in their supply chains.

The Fair Wear Brand Performance Check measures the results of the efforts of an affiliated brand to respect human rights and to carry out human rights due diligence (HRDD). HRDD is the process through which companies can identify, prevent, mitigate and address their actual and potential adverse impacts throughout their supply chains. The efforts are measured against a set of indicators developed by Fair Wear and publicly available on the Fair Wear website.

The statuses -Leader, Good, Needs Improvement- are granted according to calculated levels of achievement in the system. It does not compare the efforts and achievements of the affiliated brands against other non-affiliated brands.

Scoring overview

Total score: 182

Possible score: 200

Benchmarking Score: 91

Performance Benchmarking Category: Leader



Summary:

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

Nudie Jeans sources from 32 suppliers across multiple production countries, with the majority of production concentrated in Tunisia and Italy. Nudie Jeans' sourcing strategy focuses on increasing influence through consolidation, long-term relationships, and active cooperation with other clients. The company maintains a stable supplier base, with 96% of its total FOB coming from suppliers with whom it has had a business relationship for more than five years.

Nudie Jeans has a comprehensive and systematic approach to identifying and prioritising human rights risks. The company conducts country- and factory-level risk assessments, incorporating multiple data sources such as onsite assessments, worker questionnaires, supplier input, and stakeholder information. The member has a strong understanding of risks across all Code of Labour Practices, including freedom of association and gender-related risks, and integrates these into supplier-specific risk profiles and action plans.

The member demonstrates advanced performance on responsible purchasing practices. Nudie Jeans collaborates closely with its suppliers on production planning, using early forecasting, long lead times, and continuous dialogue to prevent excessive overtime. Suppliers are actively involved in capacity planning, and the company manages growth while maintaining stable and predictable order volumes. Nudie Jeans has also made significant progress on living wages. The company has a clear understanding of wage levels and wage gaps across its supply chain and has developed a systemic and time-bound strategy to increase wages. It has implemented living wage projects with selected suppliers, including open costing, labour-minute calculations, and order-based contributions to wage increases, and has set a target to pay its share of living wages at prioritised suppliers by 2030.

At the same time, some challenges remain in ensuring impact at supplier level. While most actions are followed up, not all actions are fully verified, and a significant share of findings remain unresolved or under validation. In particular, findings related to excessive overtime and wage compliance require continued efforts to achieve sustained improvements. To further strengthen its human rights due diligence system, Fair Wear recommends Nudie Jeans to enhance validation of corrective actions and support sustained remediation of excessive overtime and wage-related findings.

Company Profile Nudie Jeans Co.

Member company information

Member since 1 Jan 2009

Product types Apparel

Business type Retail;Wholesale;Other

(Main) selling markets Indonesia, Germany, Denmark, United Kingdom of Great Britain and Northern Ireland, Israel, Japan, Netherlands, New Zealand, Philippines, Sweden, United States of America, Australia and Austria

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

Production Country	Number of production locations	Percentage of production volume
Tunisia	4	58.57%
Italy	7	26.75%
Portugal	7	5.87%
India	5	4.95%
Poland	2	1.77%
Türkiye	2	1.56%
Sweden	2	0.23%
United Kingdom of Great Britain and Northern Ireland	1	0.11%
Lithuania	1	0.1%
Latvia	1	0.08%

Member of other MSI's/Organisations [GOTS and STICA](#), [Fur Free Alliance](#), [RISE Chemical Group](#)

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](#)

Layer 1 Foundational system's criteria

Possible Points: 7

Earned Points: 7

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

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

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

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

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

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

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

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: [N/A](#)

Comment: In the financial year 2025/2026, the Fair Wear communication Guidelines are not applicable for consumer-facing communication due to changes in the policy related to the Empowerment of Consumer Directive (EU 2024/825). Therefore, this indicator is not applicable.

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

Possible Points: 90

Earned Points: 82

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: Nudie Jeans has a sourcing strategy focused on increasing its influence to improve working conditions at supplier level. The member has 32 active suppliers, with 83% of its production volume sourced from suppliers where it holds at least 10% leverage. Only 11% of production volume comes from suppliers where Nudie Jeans accounts for less than 2% of the supplier's total FOB. This represents an improvement compared to the previous Brand Performance Check. Nudie Jeans' sourcing strategy explicitly focuses on increasing influence through supplier consolidation and active cooperation with other customers.

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

Comment: Nudie Jeans' sourcing strategy focuses on maintaining long-term relationships. 96% of the member's total FOB volume comes from suppliers with whom Nudie Jeans has had a business relationship for at least five years. The member commits to long-term relationships via indefinite contracts with a six month notice period for both parties. The long-term contracts are embedded in Nudie Jeans's sourcing strategy, ensuring they are implemented across its supplier base.

Recommendation: Nudie Jeans is advised to consider fixed-term sourcing commitments with duration guarantee and consistent orders or volume commitment

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.	Intermediate	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.	4	6	-2

Comment: Nudie Jeans has a risk scoping in line with the Organisation for Economic Co-operation and Development (OECD) Guidelines. While Nudie Jeans' risk scoping includes all eight Code of Labour Practices (CoLP) and the following risk factors: country, sector, business model, sourcing model, product level, and a gender lens for some of its production countries, Nudie Jeans has not uniformly applied this approach to other production countries including Portugal, Sweden, Latvia, Poland, and the UK.

Nudie Jeans conducts a high-level risk scoping for all production countries using six internationally recognised country-level risk indices covering governance, political stability, human development, environmental performance, and broader social and institutional risks. The member brand uses Fair Wear's Risk Scoping tool and supplements their risk scoping with country studies, research and external resources, and insights from assessments and visits, to identify country risks and the likelihood and severity of the risks, and then classifies the risks into a risk level and risk matrix. In its risk scoping, the member has correctly assessed the impact and prevalence of the risks. The risk scoping includes a gender lens. Input from workers, suppliers, and stakeholders is included in the risk scoping by using Fair Wear's country risk profiles, in which worker, supplier and stakeholder inputs are embedded and stakeholder-informed sources such as human rights reports, indices.

Sourcing decision is based on country risk scoping. Based on country-level assessment of human rights risk, Nudie Jeans has a fixed production country list consisting of countries scoring above a certain threshold. The member adjusts its sourcing strategy based on the risk scoping, for example, in the decision-making regarding exploring new lining suppliers in Europe despite the global trend for lining production in Asia (i.e. Pakistan).

Nudie Jeans conducts the risk scoping at least yearly and is updated regularly with new information from visits, training, and assessments. To date, Nudie Jeans sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear strongly recommends Nudie Jeans to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy. The brand is advised to scale and replicate the depth of its risk scoping for all countries.

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 Nudie Jeans to inform new suppliers about its HRDD policy and Fair Wear membership. The member engages in dialogue early. Throughout the onboarding process, Nudie Jeans engages in dialogue about human rights and how it can cooperate with the supplier on the topic. This process has been followed for the new supplier added last year.

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.	Intermediate	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.	4	6	0

Comment: Nudie Jeans has established a strong supplier selection and onboarding process, before the first purchase order is placed. Nudie Jeans collects human rights information of potential new suppliers in several ways. Nudie Jeans conducts site visits that include a standard social and environmental sustainability factory assessment and a review of existing on-site assessment reports before starting new business relationships. The supplier must also sign Nudie Jeans documents including the Code of Conduct, Chemical Policy, Human Rights Policy and Anti-Slavery Statement, Fair Wear Foundation Questionnaire and post the Workers Information Sheet in the factory. New suppliers are also required to sign a supplier agreement which includes a Transparency Policy outlining Fair Wear Foundation requirements and requirement for openness to on-site assessments. Nudie Jeans's sourcing strategy requires suppliers to demonstrate a democratic environment in the workplace, and thus privileges suppliers where workers are free to form a trade union and/or bargain collectively. Thus, Nudie Jeans also collects information on worker demographic, union membership or worker committees, Collective Bargaining Agreements (CBA), and internal communications systems. However, workers' input before the first purchase order is not yet incorporated systematically. While the information collected through this process has not yet resulted in the need to change a sourcing decision, it plays an important role in evaluating suppliers and informs decisions on whether to proceed with a new supplier relationship. Nudie Jeans followed this process for the suppliers added in the previous year.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

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

Comment: In the previous financial year, Nudie Jeans added one new factory. Nudie Jeans has engaged in dialogue, collected human rights information, and shared information about Fair Wear's CoLP and the grievance mechanism before the first purchase order. Within the first year of doing business, Nudie Jeans has ensured that the Worker Information Sheet has been posted and has organised an external onboarding training programmes, which are verified by Fair Wear. This training programme includes awareness raising on the Fair Wear CoLP, grievance mechanism, and social dialogue for workers and management.

Indicators on Identifying continuous human rights risks

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

Comment: Nudie Jeans has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each factory. Nudie Jeans uses the outcomes of its risk scoping exercise to identify potential harms at the factory level and conducts a standard factory-level risk assessment. Nudie Jeans' standard risk assessment approach employs tools such as a standard factory assessment template covering social and environmental sustainability topics, which Nudie Jeans staff use during regular on-site visits at all factories; Fair Wear on-site assessments; external audits; and, where applicable, research reports and worker committee meeting minutes. Most of the monitoring tools used by Nudie Jeans to assess risks at the factory level also include input from workers and suppliers, through ongoing dialogue, worker questionnaires, grievances and training programmes. Nudie Jeans has begun to roll out a worker questionnaire to collect and analyse workers' inputs on working hours, wages, growth opportunities, gender disparities, violence and harassment, health and safety, complaints system and worker representation.

Nudie Jeans uses the results of its monitoring tools to regularly complete and update its factory risk assessment. Insights from the questionnaire and other monitoring tools are systematically incorporated to supplement the factory risk assessment. Based on the factory risk assessment, Nudie Jeans has prioritised the most significant risk per factory for preventive and mitigative actions. For example, following an onboarding training at one factory in India, Nudie Jeans learned that the factory has low maturity in terms of internal management system and grievance mechanism and has consequently increased the likelihood and severity score for FoA violations in that factory

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

Comment: Nudie Jeans can demonstrate advanced knowledge and understanding of FoA in all countries where it sources. Nudie Jeans has mapped the risks to FoA across all its sourcing countries and can explain the main risks in each country, including those to women workers. The risks identified are gender violence and harassment, and reporting channels and internal systems to resolve gender issues. Nudie Jeans uses this information to understand the risks at its production locations.

The member is aware of the status of FoA at each production location and which locations have trade unions and collective bargaining agreements (CBAs). Nudie Jeans has production location-level monitoring in place to assess and understand risks at the production location. The member uses a standard worker questionnaire template, on-site assessments, in-depth discussions with suppliers and, where applicable, worker interviews to inform its assessment and how it engages with its suppliers on this topic and improvement plans.

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.	Intermediate	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.	4	6	0

Comment: Nudie Jeans has included gender in its human rights risk identification. Nudie Jeans includes a gender lens in their risk scoping exercise for most countries for all CoLP, drawing from research, reports, and third-party stakeholder-informed sources. The member could show that it understands the gender risks in its sourcing countries. For example, Nudie Jeans has identified discrimination, harassment, and limited legal enforcement of laws protecting women, and underrepresentation in worker committees and supervisory/managerial positions as important risks prevalent in Türkiye. Based on that overview, at the country level, Nudie Jeans has prioritised India, Türkiye, and Tunisia as higher-risk contexts, while Italy, Portugal, Poland, Lithuania, and Sweden are assessed as lower priority in relative terms.

Additionally, Nudie Jeans actively collects gender data per factory. At a minimum, all production locations are assessed using gender equality indicators from the Ethical Trading Initiative (ETI) and the International Labour Organisation (ILO), consisting of questions capturing risks related to discriminatory practices, maternity-related treatment, access to benefits, gender-based harassment, and structural inequality. More recently, Nudie Jeans has begun to roll out worker questionnaires, starting with production locations in Türkiye and Tunisia, accounting for approximately 60% of its FOB, which collect gender-disaggregated data on wages and the ability to meet basic needs, overtime practices, work–family balance, access to maternity/paternity-related leave, training programme and promotion opportunities, worker representation and freedom of association, workplace safety, and violence and harassment.

For production locations with more advanced gender data collection and analysis, insights from the analysis inform the gender lens when looking at the CoLP at a factory level, risk assessment, and monitoring and training needs. For example, Nudie Jeans' analysis revealed that the most relevant risk areas emerging across production locations are women's position in the workforce, access to supervisory and higher-paid roles, maternity protection and related benefits, the effectiveness of grievance mechanisms for gender-related complaints, and the extent to which formal systems such as gender policies and performance reviews are in place. Nudie Jeans also adjusts its risk assessment score based on results of the analysis. For example, results of a gender questionnaire in 2025 has prompted the brand to increase the severity score for a particular labour practice for a supplier in Tunisia. Nudie Jeans has analysed how its business practices affect gender at some of its suppliers. Nudie Jeans plan to expand this gender-responsive approach to more countries and production locations, based on a prioritisation approach.

Recommendation: Nudie Jeans is recommended to expand its gender data collection and analysis to all production locations for all Code of Labour Practices.

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

Comment: Nudie Jeans has a strong and systematic evaluation system for assessing all suppliers' human rights performance annually involving all relevant departments in the organisation: Product Development, Sustainability, Supply Chain, and Finance. Social sustainability metrics the brand considers are: transparency, assessment results and follow-up on action plans and quality of communication. Based on the cross-department evaluation, Nudie Jeans conducts a joint meeting to discuss the scoring and actions required. Nudie Jeans places suppliers in three ranked categories based on a benchmarking score which also includes a score threshold for phasing out. Nudie Jeans also asks suppliers to evaluate them on their partnership, which gives them insights into the impact of their business practices. The brand discusses the outcomes of the assessments with its suppliers and discusses improvement plans together.

The brand systematically integrates the outcome of this evaluation into its purchasing decisions, combined with parameters such as: the duration of the business relationship and the importance of the supplier for the specific product category. Phase out is a last-resort action, and Nudie Jeans collaborates with their suppliers for improvements. When a supplier does not meet the benchmarking score for two years in a row, the brand determines suitable action, like an increased monitoring plan or a responsible disengagement plan. Meanwhile, Nudie Jeans rewards good-performing suppliers across the different evaluation categories with sustainability co-investments such as solar panels and water treatment. In the previous financial year, the brand has not needed to change any of its purchasing decisions based on this evaluation. This is because Nudie Jeans works with a limited number of suppliers for each product group, focusing on long-term relationship and shared continuous improvement instead of continuously selecting or comparing in-between new suppliers. Nudie Jeans has not yet shared the outcome of the evaluation with worker representatives.

Recommendation: Fair Wear recommends Nudie Jeans to share and discuss the outcome of the supplier evaluation with their suppliers' worker representatives.

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: At policy level, the member explicitly prohibits unauthorised subcontracting. This is embedded in its Code of Conduct, HRDD Policy, and Transparency Agreement, which require suppliers to disclose all production locations and align with Fair Wear requirements. There is no evidence of missing subcontractors in the database. Nudie Jeans uses the findings from its human rights monitoring system, which includes an evaluation of how certain product types are more prevalent to risk, to address risks related to unauthorised subcontracting. The member has identified locations with higher risk for unauthorised subcontracting, particularly in Italy, and includes this risk in its country-level risk assessments.

Additionally, the member actively prevents unauthorised subcontracting by maintaining close oversight of production. Nudie Jeans has quality teams present at key suppliers in major sourcing countries, who follow production processes closely and can report directly on any irregularities. Regular visits by CSR staff, combined with strong supplier relationships, support transparency and enable early identification of subcontracting practices and continued efforts to verify where production takes place. The member brand also conducts supplier trainings to raise awareness of labour standards and subcontracting expectations and engage specialised auditor. Furthermore, Nudie Jeans has shown considerable efforts over the years to get more transparency deeper in its supply chain. The brand uses traceability systems and transaction documentation (e.g. for organic cotton) to verify supply chain flows.

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: Nudie Jeans' Code of Conduct signed by all suppliers explicitly prohibits homeworking as it makes ensuring safe labour conditions more difficult. Nudie Jeans has identified whether homework is prevalent in its sourcing countries. At a high level, Nudie Jeans' product risk assessment has identified production processes with a risk for homeworkers, for example, certain shirts and sweatshirt models requiring embroidery. Nudie Jeans require suppliers to inform them if an operation for a garment requires homeworking and to ensure a place at a facility where labour conditions can be monitored. Nudie Jeans prevents and verifies the existence of homeworking in its production through identifying risks at an early stage of the design and product development processes/choices, maintaining close oversight of production with local staff in key countries, strong product and production knowledge of internal staff, long-term relationships enabling transparent dialogue, and regular checks during visits. Nudie Jeans' staff are trained to identify risks of homeworking when a new product or a new process is involved.

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.	Advanced	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.	4	4	0

Comment: Nudie Jeans uses indefinite-term contracts with its suppliers that can be terminated by either party with six months' notice. These contracts support the implementation of human rights due diligence and outline the shared responsibilities of CoLP implementation by stipulating terms on payment, liability, transparency, and agreement and termination. Nudie Jeans pays most of its suppliers within thirty days of receiving the invoice, and payment terms are up to 60 days upon delivery at most. The contracts include clauses related to late delivery, liability, and damages that are generally linked to responsibility. Penalties for delays or defects are clearly defined and structured. In practice, Nudie Jeans applies a fault-based approach, whereby responsibility for delays is discussed with suppliers before costs are allocated. For instance, the member acknowledges responsibility for delays caused by its nominated suppliers, while suppliers remain responsible for their own production processes. While clauses related to airfreight and delivery delays do not explicitly define cost-sharing mechanisms, in practice, Nudie Jeans complements its contractual framework by applying purchasing practices that are favourable to suppliers, such as flexibility in case of delays, maintaining long-term relationships, engaging in dialogue with suppliers to determine distribution of costs, and offering early or advance payments upon request. In the event of force majeure, both Nudie Jeans and its suppliers are exempt from liability for failing to fulfil contractual obligations. Suppliers may also charge interest on late payments in accordance with the Swedish Interest Act.

Regarding liability, contracts indicate that suppliers may be responsible for damages; however, in practice, Nudie Jeans assesses responsibility jointly with suppliers rather than applying automatic penalties. This reflects a more balanced, fault-based approach, even where contractual wording may be stricter. Additionally, these contracts support the implementation of human rights due diligence by requiring compliance with the Code of Conduct and Fair Wear requirements, embedding expectations on transparency, supporting long-term business relationships and stability for suppliers, applying pricing practices that aim to cover production costs, including labour cost considerations, and covering audit costs to reduce financial burden on suppliers. Suppliers may also charge interest on late payments in accordance with the Swedish Interest Act. However, several elements indicate that financial risks are not yet fully shared. For example, suppliers bear the risk for leftover materials, as no compensation is defined in the event of termination, and no explicit clauses were identified that compensate suppliers for unused capacity or last-minute order changes.

Recommendation: Fair Wear recommends Nudie Jeans to further strengthen the shared responsibility aspect in its supplier contracts by including clauses that more equally distribute financial risks, such as compensation for leftover materials, unused capacity, and last-minute order changes.

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. Nudie Jeans uses shared systems and internal documentation tools to ensure visibility of supplier-related information across teams. In addition, travel reports from supplier visits are systematically shared between production, design, and CSR teams. This facilitates a two-way exchange of information, where both CSR and operational teams contribute to, act on insights related to responsible business practices.

The member implements a Responsible Business Conduct policy which includes responsible business practices in job role competencies. Sustainability objectives are integrated into the company strategy, and responsible business practices are embedded in goal setting and performance evaluations across departments. For example, sustaining long term supplier relationships and transparency considerations make part of the role competencies within sourcing, product, and production functions, as well as management roles such as the Head of Buying and Head of Product and Production

Sourcing, purchasing, and design staff work with Key Performance Indicators (KPIs) to support effective sourcing and pricing strategies. These include internal targets related to: Achieve 100% living wage payment coverage at prioritized suppliers by 2030 where wage gaps are identified, and collect open costing data from suppliers engaged in living wage programmes. Additionally, supplier feedback mechanisms, such as supplier evaluation surveys, are used to inform and improve purchasing practices.

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: Nudie Jeans has a structured and collaborative production planning system that actively involves suppliers and aims to support reasonable working hours. The member uses forecasting and long-term planning, starting as early as the design and development stage. Orders are prioritised, and production planning is discussed in detail with suppliers, including expected lead times and weekly production capacity. The member demonstrates a clear understanding and use of supplier capacity. Suppliers are actively involved in the planning process, providing input on their available capacity, preferred lead times, and low and peak seasons. Nudie Jeans discusses with suppliers when and how orders should be placed, and aligns production planning accordingly. Orders are placed well in advance, often before final sales data is available, to avoid time pressure and allow for smoother production. The member also works with carry-over styles and minimum stock planning to stabilise production and avoid interruptions.

Nudie Jeans avoids late design or quantity changes whenever possible and accepts longer lead times when changes occur. Fabric forecasts are developed early based on estimated order volumes, allowing suppliers to prepare production in advance. The member also pre-purchases fabric where needed to ensure continuity in production and reduce last-minute pressure. During the financial year, the member experienced a significant increase in order volumes due to growth in customer demand, which resulted in limited spare production capacity. Nudie Jeans managed this by maintaining close communication with suppliers, prioritising orders, and providing flexibility in delivery timelines. Delays and adjustments were managed collaboratively, without imposing unilateral pressure on suppliers. Unforeseeable delays, such as material delays, are accepted and addressed through transparent communication and adjustments to planning. Overall, Nudie Jeans collaborates closely with its suppliers to plan, monitor, and evaluate production processes and demonstrates a strong focus on preventing excessive overtime through early planning, supplier involvement, and continuous dialogue.

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

Comment: Nudie Jeans can demonstrate a clear understanding of the labour cost component of its buying prices. The member has insight into wage levels and wage gaps across its production locations and uses fact-based costing and the Fair Price tools to understand the number of labour minutes required for a style, the labour minute value at the factory level, and the gap between current wages and target wage scenarios. Price-wage relations are established for at least a third of its suppliers, and for three suppliers in its living wage programme, the labour component of wages is more detailed. For example, in the shared costing sheets, the member can demonstrate the actual sewing minutes per style and the corresponding labour cost component under both the legal minimum wage and target wage expectations. However, fact-based costing has not yet been systematically collected for all suppliers. Thus, the member brand does not yet have systematic insight into the labour cost component of all their buying prices and how its prices influence wages and working conditions throughout their supply chain.

The member does not use this costing information to push prices down. Instead, Nudie Jeans uses these insights to understand product and production complexity better and to support wage increases and broader discussions of responsible pricing. In practice, the member indicates that labour costs are treated as protected in these discussions. At the same time, commercial conversations focus more on issues such as style simplification, fabric choices, efficiency, or volume. The member also considers wage data and living wage contributions in its pricing approach. At the same time, this approach is not presented as a single standardised model that can be uniformly applied to every supplier; rather, it adopts a tailored approach for each supplier.

Recommendation: Nudie Jeans is encouraged to continue expanding its strong and systematic understanding of wage levels and the labour component of its prices at all its suppliers.

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: Nudie Jeans works with a limited number of sourcing intermediaries. In most cases, the member maintains direct relationships with production locations, including production locations for supporting processes, and applies the same human rights due diligence and monitoring requirements regardless of the financial arrangement. Production locations included in the contractual obligations of main suppliers and are treated by the member as production locations within its direct scope of influence. The member require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP) by assessing the planning process and payment terms in factory onsite assessment reports. The intermediary plays an active role in supporting the implementation of human rights due diligence and the CoLP. This includes facilitating communication between the member and the factory, supporting the implementation and follow-up of assessments and training activities, and assisting with compliance and monitoring processes. In the financial year under review, Nudie Jeans worked with one intermediary. The intermediary is informed about Fair Wear requirements and the Code of Labour Practices (CoLP), and has agreed to ensure transparency regarding production locations. Nudie Jeans maintains direct contact with the factory management and conducts regular visits, ensuring that transparency and oversight are not delegated solely to the intermediary.

Layer 3 Prevention, mitigation and remediation

Possible Points: 96

Earned Points: 86

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

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

Comment: Nudie Jeans has prioritised risks and created action plans per supplier, accounting for 100% of the total FOB. These match the risk profile. The action plans detail the different approaches to prevent, mitigate and remediate the prioritised risks and include a timeline. Nudie Jeans developed and implemented preventive actions to address the risk identified in its production locations throughout its supply chain, for example, asking factory management to improve policy and procedures on non-discrimination and document non-discrimination policy implementation; or in another factory, conducting onboarding trainings, which showed the need for more effective grievance mechanism, which in turn informed the action it pursued to prevent the erosion of internal communication channels and social dialogue mechanisms. Nudie Jeans has a general CSR budget for its social impact activities, where factories are prioritised in terms of budget allocation, matching their risk profile and need for intervention.

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: Nudie Jeans has included a gender lens in some of its improvement and prevention actions, and has started to implement this in practice. The company appears to use gender risk data at country and factory level to inform a select number of action plans. For example, factory-level worker-questionnaires cover gender-disaggregated data, where worker voice, wage analysis, training participation, gender-based violence, discrimination, and women's career progression have been identified as relevant topics. These findings in turn help inform dialogue with suppliers and actions such as gender equality training in Italy and training for female supervisors in India. However, this approach is not yet consistently applied across all action plans systematically. In several cases, the current focus remains on gathering additional information and worker input before translating findings into more comprehensive follow-up measures. Overall, the member brand shows a meaningful and developing approach to integrating gender into action planning, but this is not yet comprehensively applied and documented across all prevention and improvement steps for each labour standard.

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

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

Comment: Nudie Jeans included comprehensive steps to encourage freedom of association (FoA) and effective social dialogue in its action plans and has implemented these steps. In higher-risk contexts, such as India, Tunisia and Türkiye, Nudie Jeans has focused its efforts on trainings, workplace dialogue, grievance mechanism follow-up and worker committee engagement. In lower-risk and smaller production contexts, the company has followed up through visits and discussions adapted to the local setting. The company's action plans include concrete follow-up measures linked to FoA and social dialogue findings, such as supporting workplace dialogue training, encouraging democratic worker representation, promoting discussion of corrective action plans with worker representatives, and following up on whether audit reports are shared with worker representatives. Examples include completed actions at suppliers in Tunisia to ensure worker representatives are chosen democratically and regular elections are conducted, as well as completed actions to encourage management to share audit reports and corrective action plans with worker representatives and to involve worker representatives in discussing these plans. The company has also used trainings, onboarding sessions, worker committee follow-up, and grievance-related discussions as part of its implementation of FoA and social dialogue measures. The member has also applied a gender lens in its efforts to promote FoA and effective social dialogue, for example by considering women's representation in worker committees and by ensuring women are included in relevant trainings.

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

Comment: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and are monitored systematically throughout the relationship. Nudie Jeans collects information on the existence and functioning of internal grievance mechanisms through supplier discussions, factory visits, on-site assessments, and at times, inputs from worker or worker representative. It assesses how these mechanisms operate in practice by reviewing worker awareness, checking worker committee meeting records, assessing suggestion box usage, calling the internal hotline number, reviewing internal complaints documentation and cross-checking findings with audit reports.

The member brand actively supports the functioning of these mechanisms through concrete actions. For example, it has supported the establishment and strengthening of internal grievance systems, ensure that suppliers appoint responsible staff for implementation, and requiring documentation and monitoring of complaints and follow-up actions. At several suppliers, the brand has implemented actions such as encouraging workers to record complaints in formal systems, ensuring all complaints are documented and followed up, and monitoring whether issues raised by workers are remediated in line with company policies. When grievance mechanisms are found to be less effective, Nudie Jeans takes corrective actions such as strengthening internal communication systems, increasing worker awareness through training programmes, supporting worker committee engagement, and following up on grievance-handling processes.

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

Comment: Nudie Jeans cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers that are not shared with other members, Nudie Jeans works together with other customers, mostly through information sharing and policy work. Next to that, the member also cooperates in taking more preventive measures, such as organising and following-up on training and onsite assessments, setting up social dialogue structures in a factory, collaborating on risk assessments with a gender lens and joint living wage work.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	92.83%	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 Brand Performance Check, Nudie Jeans could demonstrate that it has verified and completed 93% of actions out of all outstanding actions. These actions are linked to findings identified through Fair Wear full onsite assessments in the previous three financial years. Completed and verified actions cover a wide range of labour standards, including living wage, working hours, occupational health and safety, grievance mechanisms, and factory communication. For example, the company has followed up on wage-related findings through actions such as conducting cost analyses, reviewing purchasing practices, discussing price increases, and supporting the gradual increase of wages. It has also addressed awareness gaps by ensuring workers are informed about grievance mechanisms and labour conditions, and implemented numerous health and safety improvements such as ensuring emergency systems, medical checks, and workplace safety measures are in place. At the same time, Nudie Jeans could not always demonstrate that all completed actions were verified with sufficient evidence. In some cases, actions were marked as completed while documentation or proof of implementation was still pending or partially available. For example, for certain occupational health and safety findings, including the provision of appropriate personal protective equipment or anti-fatigue measures.

Recommendation: Fair Wear recommends Nudie Jeans to complete actions only after verification confirms the implementation of the action.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of validated, solved findings.	40%	Validated solved findings are findings that have effectively been prevented, mitigated or remediated. This indicator assesses if actions have led to findings being solved and therefore measures actual progress at suppliers.	Fair Wear Member Hub.	4	6	-2

Comment: Nudie Jeans can prove that 40% of findings were validated and solved within the set timeframe. The validation shows that the brand's action plans have led to the intended results, and findings of actual or potential harms have been effectively prevented or remediated. For findings that emerge from a grievance, Nudie Jeans resolved them through grievance remediation processes. The sample shows that validated and solved findings mainly relate to factory communication, factory management systems, and several health and safety issues. For example, at one supplier in India, validation confirmed progress on issues such as falsified documents, legal minimum wage payment, payroll inconsistencies, working hour registration, childcare facilities, evacuation drills, emergency lighting, and the provision of anti-fatigue mats and chairs. At one supplier in Tunisia, validation confirmed progress on issues such as worker awareness of grievance channels, sharing audit reports with worker representatives, fire alarm and fire-fighting equipment, medical checks, temperature control, and employment contracts. At the same time, several validated findings remain unresolved or under validation, particularly where issues are more complex or structural. These include findings related to living wage, overtime premiums, working hours, wage payment delays, occupational health and safety systems, and some communication and access issues.

Recommendation: Fair Wear recommends that Nudie Jeans validate all open findings that are ready for validation.

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 expects 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: Nudie Jeans has suppliers where no formal improvement plans are deemed necessary based on their low-risk profile. These cover approximately 9% of the member's total FOB. Still, at these suppliers, the company maintains regular dialogue with factory management through visits, annual data collection, and discussions on production processes, wage levels, and working conditions. The member brand regularly reassesses the risk profile of these suppliers and continues to monitor developments, including through the introduction of indicators such as gender equality measures and follow-up on any identified improvement points. While Nudie Jeans maintains regular contact with factory management, it does not currently involve worker representatives in discussions on potential human rights risks at these suppliers.

Recommendation: Nudie Jeans 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.	Intermediate	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	4	6	0

Comment: A total of four findings related to excessive overtime have been identified across Nudie Jeans' factories: three remain unresolved, and one is ready for validation. The majority of these findings relate to excessive working hours and lack of rest days, including workers exceeding the 60-hour limit and not receiving one day off per seven days. Nudie Jeans analysed the root causes of these findings. According to the member, its own production planning does not primarily drive excessive overtime; rather, it is driven by factors such as subcontracting arrangements (e.g., outsourced security staff), operational decisions at the factory level, production scheduling practices, and pressure from multiple buyers.

The member has taken several actions to address these root causes. For example, at one supplier in India, excessive working hours among security staff were linked to outsourced labour arrangements. The factory terminated the contract with the third-party provider and introduced a new security agency with improved working conditions, including weekly rest days, and implemented monitoring mechanisms. At another supplier, the member addressed overtime through planning-related measures and dialogue with factory management.

In addition, Nudie Jeans has addressed systemic causes by adapting its own purchasing practices. The company spreads production across longer periods, places orders earlier, builds buffer time into planning, and avoids rush orders. These practices are regularly discussed with suppliers, including during annual visits that involve both human rights and product development teams. The member also engages with other brands to address shared root causes, for example, in response to a complaint about mandatory overtime, where joint actions included strengthening worker representation and grievance mechanisms, and clarifying the voluntary nature of overtime.

However, despite these efforts, excessive overtime has not yet been consistently reduced. For example, at one supplier in India, a validation assessment confirmed that security staff continued to work excessive hours despite earlier actions, and the finding remains unresolved. This indicates that while root causes have been identified and actions have been taken, these have not yet led to sustained improvements.

Recommendation: Fair Wear recommends that Nudie Jeans continue to verify and validate whether corrective actions addressing excessive overtime lead to sustained improvements and adjust remediation measures where findings remain unresolved.

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: A total of nine findings related to non-payment of the legal minimum wage or legally mandated wage components have been identified across Nudie Jeans's factories, of which all have been followed up, one has been resolved to date, and three are undergoing or ready for validation. The findings include instances of incorrect calculation of legal minimum wages, non-payment of overtime premiums, and issues related to allowances, bonuses, or social security benefits.

Nudie Jeans responded to these findings in a timely manner by engaging with suppliers, identifying root causes, and implementing corrective actions. For example, at one supplier in India, legal minimum wage violations were addressed by correcting the wage calculation method and validating wage records, ensuring workers were paid in accordance legal requirements. At another supplier, issues related to payment of overtime premiums were addressed through awareness training and improved communication to clarify how wages and overtime are calculated.

Nudie Jeans analysed the root causes of these findings. According to the member, most issues are not structural but related to administrative and operational factors such as incorrect wage calculation methods, lack of understanding of wage requirements, or insufficient awareness among management and workers. The member has addressed these issues and promotes transparency on wages by requesting payslips, reviewing wage records, conducting training, and discussing wage calculations with both management and workers.

However, Nudie Jeans could not demonstrate that all due wages were fully compensated retroactively in all cases. For example, at one supplier, wage-related issues were linked to third-party contracted workers, where retrospective payments were not fully made for all affected workers, although measures were taken to prevent recurrence. In addition, three findings related to wage verification and payment of benefits remain open or under validation.

Recommendation: Fair Wear strongly recommends Nudie Jeans to always verify whether legal minimum wage issues have been resolved in case factory management claims so. Nudie Jeans could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check remediation.

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

Comment: Nudie Jeans discusses the topic of wages with all of its suppliers. The company collects and reviews wage data across its supply chain and has developed a detailed overview of wage levels in its production locations. It maintains a living wage gap analysis covering multiple countries and suppliers, using sources such as audit reports, supplier wage data, WageIndicator, and local or third-party living wage estimates.

Nudie Jeans understands which suppliers pay wages below living wage estimates and analyses to what extent this is linked to its own policies and practices, in particular purchasing practices such as pricing, order volumes, and consistency of orders. The member has followed up on this by reviewing internally how its practices could be improved, including assessing whether prices support higher wages, increasing order stability, engaging in open costing, and integrating living wage considerations into FOB pricing. In several cases, the company has already implemented these adjustments, including paying its share of living wages through order-based calculations and accepting lower margins to support wage increases.

Nudie Jeans has carried out a thorough root-cause analysis to understand why wages at suppliers are below living wage benchmarks. These root causes include structural factors such as insufficient pricing, lack of wage transparency, administrative calculation issues, and broader economic constraints, as well as challenges related to implementation such as distribution mechanisms, taxation, and alignment within factories. The company works closely with suppliers to understand these factors and jointly explore solutions.

Based on this root-cause analysis, Nudie Jeans has developed a systemic and time-bound approach to increase wages. The company has prioritised suppliers based on criteria such as long-term business relationships, production volume, supplier willingness, and feasibility of implementation. At selected suppliers in India and Türkiye, Nudie Jeans has already taken concrete steps to increase wages by paying its share of living wage contributions linked to production orders. It has also documented these payments and linked them to wage-gap calculations.

In addition, Nudie Jeans has developed a structured living wage project at a key strategic supplier in Tunisia. This project includes open costing, definition of labour-minute values, development of brand-contribution models, involvement of worker representatives, third-party verification through Fair Wear, and budget modelling. The project also includes a clear timeline, defined responsibilities, and planning for implementation and scale-up.

Nudie Jeans has set an internal goal to pay its share of living wages at prioritised suppliers by 2030. This demonstrates a time-bound strategy aimed at systemic wage improvement. While not all suppliers with identified wage gaps are yet covered by active wage-increase projects, the company has moved beyond analysis and discussion and has already implemented concrete wage-increase measures and structured projects.

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

Comment: Nudie Jeans has used the outcomes of its assessment of the root causes of wages below living wages in its production locations to develop a strategy for financing wage increases for its suppliers. The member brand has conducted detailed cost analyses, including labour-minute value calculations and living-wage gap assessments, to determine the financial requirements to increase wages. Based on this, Nudie Jeans has implemented financing mechanisms whereby its share of living wage contributions is added on top of the FOB price and funded through reduced brand margins. Nudie Jeans also identifies efficiencies and cost-sharing opportunities, such as shared investments in training and assessments, to support these contributions. Working with its suppliers, Nudie Jeans has set target wages for selected suppliers and developed time-bound plans to gradually increase wages towards living-wage benchmarks. The member brand has already implemented these financing approaches with several suppliers, where living wage contributions are linked to production orders and based on agreed-upon methodologies, in some cases validated through third-party involvement.

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.	86%	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: Nudie Jeans uses fact-based costing for approximately ten of its suppliers factory onsite assessment reports to ensure its prices support the payment of a living wage estimate or CBA at suppliers responsible for 86% of its FOB. The member brand mostly works with suppliers with a sectoral CBA. The member brand works with ten suppliers with CBAs in place in Portugal, Tunisia, Italy and Sweden. Nudie Jeans also tracks whether the CBA is higher than the legal minimum wages.

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

Comment: Nudie Jeans received one grievance through the Fair Wear complaints mechanism in the previous financial year concerning reasonable working hours, wages, and discrimination at a supplier in Türkiye. The member actively responded to this grievance in accordance with Fair Wear's Access to Remedy Policy and collaborated with other brands sourcing from the same supplier. The company followed up closely with the factory and Fair Wear, supported the investigation, and engaged in dialogue with both management and workers.

Actions were implemented at factory level. These included organising elections for worker representatives, strengthening internal grievance mechanisms such as worker committees, grievance boxes and open-door policies, and introducing an additional digital complaint channel. The factory also clarified that overtime is voluntary, and workers can decline overtime without negative consequences. Workers are now able to take leave more freely, including for medical appointments. The complainant confirmed that the situation had improved and expressed satisfaction with the measures taken, and the complaint was closed as resolved.

Nudie Jeans has taken steps to prevent similar grievances from occurring by supporting improvements in communication and worker-management dialogue. This includes supervisor training, improved communication around overtime practices, and actions to increase wage and bonus transparency through clearer guidelines and worker training. The member brand has also followed up on the grievance during factory visits and integrated the findings into broader engagement with the supplier. Nudie Jeans has included the outcome of this grievance in its approach to further preventive actions in its supply chain, for example by strengthening workplace dialogue, improving communication around wages and working hours, and planning additional training on social dialogue and worker awareness.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Intermediate	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.	4	6	0

Comment: Nudie Jeans has several findings where training is identified as a recommended follow-up action, particularly related to factory communication, worker awareness of the Fair Wear Code of Labour Practices, grievance mechanisms, and worker representation. The member has enrolled several of its suppliers with such findings in relevant training modules. For example, Nudie Jeans supported Fair Wear onboarding trainings at multiple suppliers in Tunisia, covering topics such as workers' rights, grievance mechanisms, and communication. In India, the company facilitated external training focused on supervisor skills and worker-management communication. In addition, at selected suppliers, training has been provided on topics such as pricing and costing mechanisms (e.g. Fair Price training module), as well as internal grievance mechanisms.

Even where training was not explicitly linked to findings, Nudie Jeans has implemented additional training initiatives. These include onboarding and awareness training, as well as engagement through visits, follow-up discussions, and training on internal grievance systems. At one supplier, external training through a third-party initiative has also been provided. The company determines training needs based on factory risk profiles, findings from audits and assessments, and ongoing engagement with suppliers. Training topics are therefore directly linked to identified risks, such as lack of awareness of rights, insufficient communication, or gaps in internal dialogue systems.

However, while Nudie Jeans has trained a number of suppliers where risks were identified, not all relevant suppliers have yet been enrolled in appropriate training programmes. For example, at some suppliers where findings related to worker awareness remain open, training has been limited due to constraints such as leverage, and alternative awareness-raising activities have been implemented instead.

Recommendation: Nudie Jeans is recommended to implement training for all factories, also where this is not part of its action plan.

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

Comment: Nudie Jeans followed up on all training results by reviewing training reports, documenting outcomes in its internal systems, and discussing results with suppliers through email communication and during factory visits. Training outcomes are tracked and reports are shared within the organisation to ensure visibility and follow-up. In practice, Nudie Jeans engages with suppliers to discuss the effectiveness of training programmes and identify any remaining gaps. For example, at one supplier where cooperation with training was initially limited, the company followed up to understand the root causes, such as logistical challenges or mismatches with expectations, and has taken these learnings into account when planning future training activities.

Additionally, Nudie Jeans uses the results of training as input for its human rights due diligence. Findings and observations from training are incorporated into factory risk assessments. The member brand also assesses the effectiveness of training across suppliers and uses this to prioritise future interventions. For example, Nudie Jeans identifies where onboarding training has been effective in improving worker awareness and where further efforts are needed, and plans additional training accordingly.

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: Nudie Jeans's human rights due diligence system includes a responsible disengagement strategy, which is aligned with international due diligence standards and Fair Wear's requirements. The strategy outlines conditions under which a business relationship may be terminated and emphasises that disengagement should be a last resort after attempts to prevent or mitigate negative impacts have been exhausted. It also includes steps such as assessing social impacts, involving relevant stakeholders, communicating transparently with suppliers, and developing phase-out plans.

In the previous financial year, the member brand disengaged from two factories with very low production volumes or short-term engagement. In these cases, the disengagement was primarily driven by business considerations such as product changes or limited cooperation rather than structural labour rights issues. Due to the low leverage, the member did not fully apply all elements of its responsible disengagement strategy in each case.

Nudie Jeans has therefore discussed its responsible disengagement strategy with its suppliers through contractual agreements and internal processes. The strategy includes requirements to inform suppliers in a timely manner, assess potential impacts on workers, and, where relevant, engage with stakeholders and develop a phased withdrawal plan.

Recommendation: Fair Wear recommends Nudie Jeans to apply its responsible disengagement strategy in all cases.

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.	Advanced	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.	6	6	0

Comment: Nudie Jeans undertakes several activities related to human rights that go beyond Fair Wear's scope, particularly by extending its due diligence approach to deeper tiers of its supply chain. The company has developed traceability for deeper tier suppliers including fabric, spinning and trims suppliers. This information is publicly disclosed per product through its transparency approach. In addition, suppliers in deeper tiers are onboarded into the company's environment, social and governance (ESG) platform, where risk assessments are conducted based on country risk and supplier-provided data through structured questionnaires. Nudie Jeans also conducts monitoring and engagement activities at these deeper tiers. The company visits key suppliers, such as fabric and spinning mills, particularly in high-risk countries, and includes them in its risk assessment processes. In India, for example, factory assessments are conducted prior to production.

Beyond monitoring, the company implements improvement actions at deeper tiers. For instance, its living wage programme includes contributions linked to spinning suppliers, and it has co-financed environmental improvements such as water treatment facilities and solar energy installations at a major supplier. These actions go beyond Fair Wear's scope and demonstrate investment in both social and environmental conditions in the supply chain.

Nudie Jeans also engages in forward-looking prevention activities. The company is piloting digital product passports, which aim to increase traceability and integrate social sustainability data across supply chain tiers. Additionally, it participates in a research collaboration project with a university and suppliers to develop methodologies for measuring and reporting social sustainability data, including worker wellbeing indicators, at deeper tiers of the supply chain.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 14

Earned Points: 14

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	In the financial year 2025/2026 the Fair Wear communication Guidelines are not applicable due to changes in the policy related to the EU Empowerment of Consumer Directive.	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.	N/A	4	0

Comment: In the financial year 2025/2026, the Fair Wear communication Guidelines are not applicable for consumer-facing communication due to changes in the policy related to the Empowerment of Consumer Directive (EU 2024/825). Therefore, this indicator is not applicable.

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).	No reselling of external brands	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.	N/A	4	0

Comment: Nudie Jeans does not sell external brands.

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: In the previous financial year, Nudie Jeans submitted a Human Rights Due Diligence Report (HRDD Report), which was reviewed by Fair Wear.

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

Comment: Nudie Jeans publishes its social report, which includes factory-level data and remediation results, on its website. Next to that, the member also publishes its full factory list and has concrete plans to include the time-bound prevention, remediation and mitigation actions it has supported for each supplier in its public reporting.

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

Comment: Nudie Jeans has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. In its evaluation system, the member includes triangulated information from external sources, such as meeting minutes from worker committees or onsite assessment reports.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	No requirements were included in the previous Brand Performance Check	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.	N/A	4	-2

Comment: In the previous performance check, no requirements were included.

5 Appreciation chapter

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

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

Comments: Nudie Jeans actively participated in lobby and advocacy efforts. In the area of human rights, the company contributed to awareness-raising initiatives, including participation in webinars such as “Empowering women in manufacturing: Critical soft skills for India’s future”. These efforts aim to support capacity building and promote improved working conditions in key production countries. Nudie Jeans also contributed to policy-related discussions and advocacy in the field of circularity, for example by providing input to national-level panel discussions on Extended Producer Responsibility (EPR). In addition, the company actively engages in broader industry dialogue on responsible business practices. This includes participation in conferences such as the Fashion Industry Summit, where Nudie Jeans shares its perspectives on sustainable business models, as well as guest lectures at academic institutions such as Salford University and the University of Gothenburg. Through these engagements, the company contributes to knowledge-sharing and promotes responsible and sustainable practices in the fashion industry.

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

Recommendations to Fair Wear

Nudie Jeans provided positive feedback on Fair Wear's follow-up from the previous Brand Performance Check and values the constructive engagement and support received.

The company is committed to continuous improvement and is particularly interested in strengthening its human rights due diligence through higher-quality data inputs and deeper supply chain engagement, including deeper tiers.

Nudie Jeans sees potential in further developing the business case for capacity building and training at supplier level, particularly in moving beyond compliance-driven approaches towards more strategic and impact-oriented programmes.

The member brand also indicates interest in strengthening its work in European production countries, such as Portugal and Italy. While initial support has already been provided, Nudie Jeans recommends continued focus and tailored guidance from Fair Wear to further develop interventions in these regions.

Brand Performance Check details

Date of Brand Performance Check: **16-06-2026**

Conducted by: **Dominic Pradana**

Interviews with: **Ida Aguilar - Human Rights and Social Impact Specialist**

Jenny Henriksson - Head of Product and Production

Sandya Lang - Chief Sustainability Officer

Sofia Bäck - Finance Dept