



Response to the Jo-In

We at PUMA are aware of the challenges and problems associated with a global sourcing structure. As an accredited member of the Fair Labor Association (FLA) PUMA has developed a Code of Conduct which forms a legally binding part of our supplier contracts. Our puma.safe team carries out around 400 supply chain audits each year to measure compliance with ILO core labour standards. Since 2002 we have conducted more than 2.500 such audits at our direct suppliers and their subcontractors worldwide. Our internal efforts are complemented by external and unannounced audits via the FLA.

We are aware that auditing is neither the only option nor the final solution when it comes to implementing code compliance in our supply chain. Capacity building and joining forces with others is just as vital to achieve real progress on the ground.

As one among several such initiatives to improve working conditions, we support the Jo-In project. To partner with Jo-In underlines PUMA's efforts to reach improvements at the factory level and to benefit from the dialogue with all stakeholders involved.

We would like to take this opportunity to thank the participating organisations as well as our participating supplier SLN for all their efforts and support throughout the project. With this response we would also like to comment on the final report and make some suggestions for future initiatives on corporate accountability and workers' rights.

The Joint Initiative in Turkey as an initiative of six main players in the field of supply chain labour rights sets a benchmark towards the common goal of internationally harmonized standards. At PUMA we support this harmonization. We further suggest the standardization of audit methodologies, sharing of audit findings as well as joint remediation efforts by the various customers of a factory and their respective code initiatives. Only a common and harmonized approach will end the current practice of multiple factory audits and free resources for the required capacity building efforts.

The research subjects chosen by Jo-In (Freedom of Association, Hours of Work and Wages) are valid and remain the most challenging topics in the garment sector not only in Turkey, but also in many other countries worldwide. The concept of a wage ladder, as developed within the project, could serve as a compromise between the advocates for a "living wage" and others who point out that currently the life of many garment workers could already be improved by ensuring that at least all legal benefits are provided.

At the same time, we feel that the progress made during the last several years through different compliance programs and also during the project itself is not fully reflected in the final project report. While mainly focussing on the small sample of six participating suppliers, the report could have taken into consideration that many of the stated weaknesses at those factories were already resolved during the project while some others were never confirmed during the assessments onsite. We would also like to point out that the participating suppliers are realizing some best practices in the garment industry in Turkey, a fact that could have been highlighted more prominently in the document.

To conclude, we would like to thank the Jo-In organizers for the opportunity to participate in this challenging project and hope that the experiences gained and concepts developed will lead to an even closer cooperation of brands, labour rights expert organisations and suppliers involved in the apparel and sporting goods industry.