

# **Brand Performance Check**

# **Marc O'Polo SE**

**Publication date: March 2024** 

This report covers the evaluation period 01-06-2022 to 31-05-2023

#### **About the Brand Performance Check**

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

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

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

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

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

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.



# **Scoring overview**

Total score: 140
Possible score: 208

Benchmarking Score: 67

Performance Benchmarking Category: Leader



#### **Summary:**

Marc O'Polo SE (Marc O'Polo) has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 67, the member is placed in Leader category.

Marc O'Polo has strengthened its due diligence operations in various areas, particularly in sourcing strategy and communication transparency. However, there are also areas identified for improvement, such as strengthening long-term supplier relationships, implementing a gender lens more effectively, and enhancing awareness of workers' rights. Marc O'Polo has conducted thorough risk scoping and assessment and has shown progress in its improvement and prevention plans. Additionally, the brand has taken concrete steps towards understanding the relation between its buying prices and wages paid to workers, although there is room for further improvement.

Fair Wear recommends that Marc O'Polo strengthen its practices by committing to long-term contracts with suppliers, involving input from workers, suppliers, and stakeholders in risk-scoping exercises, and explicitly prioritising countries where workers can freely form or join trade unions. Moreover, Marc O'Polo is encouraged to integrate responsible business practices into job role descriptions for sourcing and purchasing staff, thereby embedding corporate social responsibility more deeply into its operational practices.

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

## **Performance Category Overview**

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

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

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

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

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

## **Company Profile Marc O'Polo SE**

#### **Member company information**

Member since: 1 Jan 2020

Product types: Garments, clothing, fashion apparel, Accessories and Footwear

Percentage of CMT production versus support processes 94%

Percentage of FOB purchased through own or joint venture production o%

Percentage of FOB purchased directly 49%

Percentage of FOB purchased through agents or intermediaries 68%

Percentage of turnover of external brands resold o%

FLA Member No

Member of other MSI's/Organisations Amfori - BSCI,

Number of complaints received last financial year 4

#### **Basic requirements**

Definitive production location data has been submitted for the financial year under review? Yes

Work Plan and projected production location data have been submitted for the current financial year? Yes

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

Production Country	Number of production locations	Percentage of production volume
India	27	22.85%
Türkiye	20	20.98%
China	23	17.08%
Viet Nam	11	15.92%
Portugal	10	5.63%
Tunisia	6	4.63%
North Macedonia	7	2.84%
Bosnia and Herzegovina	1	1.33%
Bulgaria	5	1.29%
Italy	7	1.22%
Bangladesh	3	1.13%
Indonesia	1	1.12%
Ukraine	2	0.95%
Spain	3	0.81%
Romania	3	0.77%
Madagascar	1	0.75%
Albania	1	0.49%
Mauritius	1	0.15%
Austria	1	0.02%



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# **Layer 1 Foundational system's criteria**

Possible Points: 8
Earned Points: 8

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

**Comment:** Marc O'Polo has a solid Responsible Business Conduct Policy in place.

- 1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes
- 1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.:
- 1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.:
  Yes
- 1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes
- 1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

**Comment:** Marc O'Polo discloses 92% of production locations internally through Fair Wear's information management system.

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

**Comment:** Marc O'Polo discloses 92% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

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

**Possible Points: 90** 

**Earned Points: 66** 

#### **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: Marc O'Polo has a sourcing strategy addressing influencing labour conditions. This strategy is covered within the CSR Policy, which forms an integral part of the wider sourcing strategy. The broader sourcing strategy also encompasses aspects such as pricing, quality, and supplier performance. The member has 130 active suppliers. 66% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 20% of the production volume comes from suppliers where Marc O'Polo buys less than 2% of its total FOB. This is comparable to the previous year. Marc O'Polo's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients.

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

Comment: Marc O'Polo has a sourcing strategy that focuses on maintaining long-term relationships. 62% of the member's total FOB volume comes from suppliers with whom Marc O'Polo has a business relationship for at least five years. The member does not commit to long-term contracts yet. Although the member does not engage in long-term contracts, they establish enduring relationships through the brand's approach to purchasing planning. All of the brand's primary suppliers have some form of "never out of stock" program, where basic items are bought in recurring, usually, big quantities and spread over a period. While this doesn't guarantee consistent orders, it is an incentive highly valued by the supplier according to Marc O'Polo. Additionally, top-level management frequently travels to visit their main suppliers to cultivate trust and nurture these relationships.

**Recommendation:** Fair Wear recommends Marc O'Polo to commit to long-term contracts. Marc O'Polo is also advised to embed long-term contracts in its sourcing strategy.

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: Marc O'Polo conducts risk scoping and includes all risk factors that include country-, sector-, business model-, sourcing model and product-level risks. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The risk scoping includes a gender lens, though not yet for each labour standard. Input from workers, suppliers, and stakeholders are included in the risk scoping by collecting information from assessments, worker committee minutes and conducting on-site worker interviews by the CSR team. Marc O'Polo could show that it knows the highest risks of each of its production countries. For China and India, where freedom of association is flagged as a risk, the brand specifically focuses on engagement with worker committees or other representatives. The member also conducts onsite interviews during monitoring visits. For risk scoping of countries where Fair Wear is not active, it consulted different resources such as CSR risk checker and also commissioned an external consultancy. The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making for Myanmar, Pakistan and Cambodia. To date, Marc O'Polo's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and bargain collectively as it believes that these topics will be addressed when it commits to a relationship.

**Recommendation:** Fair Wear strongly recommends Marc O'Polo to privilege countries where workers can freely form or join a trade union or bargain collectively and make this explicit in its sourcing strategy.

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	O

**Comment:** It is the standard process for Marc O'Polo to inform new suppliers about Fair Wear membership by sending an information letter, a questionnaire with Fair Wear's Code of Labour Practices (CoLP), and the Worker Information Sheet (WIS). This process has been followed for all new suppliers added last year. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Marc O'Polo can cooperate on this topic.

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: Marc O'Polo collects human rights information of potential new suppliers by collecting existing assessment reports and, if these do not meet its requirements, commissions a third-party assessment by Fair Wear or other provider. These assessments include information about wage levels, existing grievance mechanisms, worker representation, gender composition of the workforce, and the presence of minorities. Before the production location is onboarded, the member company discusses the supplier's current status internally in an internal cross-divisional consultation. The start of a new collaboration and order placement can only take place after the CSR department has approved the new partner. Marc O'Polo has not adjusted its sourcing decisions based on the collected information, because the selected suppliers have been motivated to improve working conditions. The brand does however have an internal policy that stipulates which countries can be sourced from, excluding those countries where the brand considers human rights due diligence restrained.

**Recommendation:** Fair Wear strongly recommends Marc O'Polo to privilege suppliers where workers can freely form or join a trade union and bargain collectively and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Basic	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.	2	6	0

**Comment:** In the previous year Marc O'Polo has added 17 new suppliers. Marc O'Polo has shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted at all locations. Marc O'Polo organised onboarding sessions for workers and the management of new suppliers. The member organised own sessions to raise awareness about the Fair Wear CoLP and the complaints helpline. The onboarding sessions included discussions to raise awareness about social dialogue. Workers were asked how they would like to provide feedback and report grievances to management about workplace issues.

**Recommendation:** Marc O'Polo is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business.

#### 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 monitor human rights risks in its supply chain.	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: Marc O'Polo takes a structured approach to addressing human rights concerns within its supply chain and has evaluated the risks at each production site. It has identified the appropriate methods and frequency for monitoring based on the outcomes of this risk assessment. For example, the company keeps a close eye on its suppliers in countries flagged with a higher risk of restricted freedom of association. This involves conducting assessments, arranging monitoring visits, sharing checklists related to freedom of association, and engaging directly with worker representatives. Marc O'Polo has engaged a consultancy to carry out risk assessments tailored to specific countries. These assessments rely on primary assessments data from the consultancy and adhere to international labour standards. The evaluation of risks follows guidelines from the International Labour Organisation, the United Nations Guiding Principles on Business and Human Rights, and other sources aligned with Fair Wear's Human Rights Due Diligence Policy. The analysis provides insight into potential risks in particular countries or regions and is tied to the suppliers of each brand.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks 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: Marc O'Polo has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to female workers. To assess the presence of FoA and Collective Bargaining (CB) rights, Marc O'Polo conducts worker interviews during various activities such as assessments, training sessions, self-assessments, and onboarding sessions. If workers encounter any issues, they are encouraged to use the factory's complaint mechanisms. Marc O'Polo also evaluates the effectiveness of these grievance mechanisms through assessments and monitoring visits. The brand uses this information to grasp the risks present at its supplier sites and to shape its approach to engaging with suppliers on these issues. It implements monitoring at the supplier level to understand and evaluate risks at those sites. In the previous financial year, Marc O'Polo required all its suppliers to complete a survey that included questions on FoA, unionisation, worker representation, and Collective Bargaining Agreements (CBAs). This initiative aimed to enhance the brand's ability to assess risks and engage with suppliers more effectively. The brand concluded that women in India, Türkiye, China and Viet Nam are underrepresented in worker representation and unions. The member company discusses the identified risks with the production locations and tries to understand the root causes per facility to ensure it can take the appropriate steps.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0



Comment: Marc O'Polo could show it understands the basic gender risks for its sourcing countries but, as described under indicator 2.3, has yet to include a gender lens for each Code of Labour Practices and production locations. For its gender data collection per production location, Marc O'Polo started with its facilities in India, as this country has a high prevalence of psychological and physical violence against women workers and has also started collecting data from its other sourcing countries and suppliers. Based on this information Marco O'Polo has developed an internal long-term programme that addresses gender inequality that addresses women in leadership roles, equal pay and day care at its facilities. While this programme has yet to be implemented, it has already been approved by top management.

**Recommendation:** Fair Wear recommends the member to collect country-level gender risks for each 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: Marc O'Polo has a robust and systematic evaluation system for assessing suppliers' human rights performance. Production locations are evaluated throughout the year. Various departments, such as purchasing, financial accounting, and Corporate Responsibility (CR), participate in the evaluation. CSR indicators include transparency, the response to complaints, and commitment to solving CAP issues. The different departments decide on an equal-weighted basis whether collaboration with a supplier should be expanded, kept the same or decreased. The supplier evaluation clearly shows the lowest-performing suppliers, who have shown too little transparency and commitment to remediate issues over time. Marc O'Polo decided to phase these out gradually. Marc O'Polo shares the outcome of the evaluation with its suppliers but has yet to share it with their worker representatives, as they think it is too buyer-oriented.

**Recommendation:** Fair Wear recommends Marc O'Polo to share and discuss the outcome of the supplier evaluation with the supplier's 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:** Marc O'Polo uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations in the database. Marc O'Polo has established a documented process to oversee its production sites and any subcontractors involved. The member brand also dedicated a clause on unauthorised subcontracting in its manufacturing agreement. Before production starts, all essential information is gathered, and assessment reports are scrutinised to detect any undisclosed subcontracting. When engaging new suppliers, including their subcontractors, visits are made before placing initial orders. Regular monitoring visits are then conducted to prevent any unauthorised subcontracting from occurring.

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:** Marc O'Polo has identified whether homework is prevalent in its sourcing countries. According to the member there is a very low risk of homeworkers being used by its suppliers because all products the brand develops require heavy machinery. The brand can prove the low risk for most of its suppliers through its regular on-site presence of its local teams during monitoring visits and the checking of employment records and factories' policy on homeworkers. Furthermore, assessments have not identified homeworkers in Marc O'Polo's supply chain.

#### **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.	Intermediate	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.	2	4	0

Comment: Marc O'Polo engages in contractual agreements with its suppliers, highlighting the Code of Labour Practices (CoLP) in these contracts. Alongside this, purchase orders set out general terms and conditions, covering aspects such as pricing. The contracts clearly delineate mutual responsibilities related to the implementation of the CoLP, including fair payment terms. For delivery delays, damages and quality issues, the brand first investigates for proof of fault. Despite Marc O'Polo's efforts to make shared responsibility clear in its agreements, there remains a disparity in the language used to describe the obligations of suppliers compared to those of Marc O'Polo. Invoices from suppliers are always paid within the agreed period. If, for whatever reason, the member brand has to claim a penalty, it is agreed with the supplier first before issuing a debit note.

**Recommendation:** Marc O'Polo is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP). In its contracts with suppliers, Marc O'Polo could ringfence labour costs to prevent negotiations from negatively affecting wages.

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 their decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

**Comment:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, job role description mentions compliance with responsible sourcing practices and that the role requires training to adhere to these practices.

**Recommendation:** Marc O'Polo could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

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: Marc O'Polo is a fashion brand that releases four main collections each year, with products being delivered three times per season, resulting in monthly deliveries. The brand plans its production process by creating a critical path for each product. In collaboration with suppliers, the brand works backwards from the delivery date to plan production, material delivery, and the final deadline for order placement. For certain products, the brand specifies the material supplier. Forecasts are provided 3-4 months prior to placing orders. The brand is aware of the total production capacity per supplier (in pieces) and compares this to the required capacity and lead times. This process is evaluated continuously and has become more accurate each season. Additionally, Marc O'Polo has formal agreements with all its suppliers, which outline the consequences for late deliveries, including penalties for any delivery failures on their part.

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.	Basic	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.	2	6	0

**Comment:** Marc O'Polo has a basic understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. The member brand has basic insight into the labour component of its prices. Marc O'Polo knows the number of actual sewing minutes needed for the styles that it calculated its cost for. Marc O'Polo includes changes in legal minimum wage or inflation in its buying prices. The member brand found that not all of its suppliers were keen to start the open costing exercise.

**Recommendation:** Marc O'Polo is recommended to investigate why some suppliers are reluctant to work with Fair Price App or any other form of fact-based costing, if needed, with the support of Fair Wear's local teams.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding 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:** Marc O'Polo has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support the implementation of the CoLP by supporting in CAP follow-up, checking capacity at the factories, reporting back on any issues to the brand. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP)

**Recommendation:** Marc O'Polo could require its intermediaries to uphold the purchasing practices mentioned in the CFRPP framework.

## **Layer 3 Prevention, mitigation and remediation**

**Possible Points: 96** 

**Earned Points: 60** 

# 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 prioritisation and follow-up programmes according to the risk profile.	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: Based on the risk identification as described in chapter two, Marc O'Polo has linked factory risks to appropriate follow-up covering all factories. Marc O'Polo could show that it prioritises actions that match the highest identified risks, including training on rights awareness and targeted action on social dialogue. In Bangladesh and India where gender is one of the higher risks, Marc O'Polo is carrying out and developing programmes to empower women and creating equal opportunities in employment. However, the actions are not always specific and can be made more SMART. Marc O'Polo sources from three suppliers in Bangladesh. The member is in the process of signing the International Accord.

**Recommendation:** Fair Wear recommends the member to further complete/improve its follow-up plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes 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: Marc O'Polo has incorporated a gender perspective into the action plans of all its suppliers. The member brand conducted training from Fair Wear's Workplace Education Programme on gender-based Violence and Harassment in India and Bangladesh where they also promote mid-level leadership through dialogue. The member brand's intends to extend this approach to other countries where production takes place. Additionally, the brand has arranged training sessions on preventing violence and harassment and has introduced incentives to enhance the representation of women in mid-level and senior positions. It also monitors the involvement of women workers in worker committees and emphasises its significance. As outlined in section 2.9, the brand has agreed on a programme with three key objectives aimed at empowering female workers. This programme advocates for women to take on leadership roles, promotes equal pay, and supports childcare facilities at its establishments.

**Recommendation:** The member is encouraged to include a gender lens in all its improvement and prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes 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: Marc O'Polo included comprehensive steps to encourage FoA and effective social dialogue in its improvement or prevention actions. The member brand has ensured the participation of its Indian suppliers in STITCH training sessions focusing on FoA and SD. These sessions equip suppliers with the knowledge and skills necessary to create a workplace environment where workers feel empowered to express their views and concerns. Additionally, Marc O'Polo conducts regular surveys for all its production countries and suppliers (including the Group 1 countries Viet Nam and China) to gauge the level of worker participation and the effectiveness of grievance mechanisms in its supplier factories. These surveys help identify areas for improvement and ensure that workers' voices are heard and addressed. Furthermore, the brand enrols its suppliers in training programmes aimed at promoting FoA and SD. This proactive approach ensures that both suppliers and workers are equipped with the necessary tools to foster constructive dialogue and resolve issues collectively. In cases where work representatives are selected rather than elected, Marc O'Polo engages in dialogue with the supplier to facilitate the organisation of an election process. This ensures that worker representatives represent their colleagues' interests and concerns. Moreover, if the follow-up plan or monitoring visit reveals that a worker representative is unknown or not adequately trained, the brand takes proactive steps to address this issue. This may involve planning and conducting training sessions to educate the representative on their role and responsibilities, strengthening the workplace's social dialogue.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal 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: Marc O'Polo assessed suppliers' internal grievance mechanisms at the start of the business relationship and monitors them systematically. Internal grievance mechanisms are reviewed as part of the onboarding process and the standard monitoring process for all suppliers. The member knows which suppliers have worker representation and monitors its functioning. Marc O'Polo supports and monitors the mechanism and responds when the mechanism is ineffective. As described under indicator 3.3, worker committees receive training on their roles and responsibilities. The brand checks the grievance training record, including its calendar, as part of its training follow-up. To check if the grievance mechanism procedure is implemented correctly, the brand also checks the grievance register to see if all grievances are registered and resolved. The brand also tests the grievance hotline to ensure its operational status. Additionally, if there are dormitories on site, they are routinely inspected. During a monitoring visit, it was noted that the grievance box was positioned near a camera, prompting the brand to relocate it to the cafeteria.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Intermediate	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	4	6	0

**Comment:** Marc O'Polo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Next to that, the member also cooperates in taking more preventive measures, such as organising training. Marc O'Polo has not yet cooperated with customers that are not Fair Wear members.

**Recommendation:** Even though Marc O'Polo already works together with other Fair Wear members, Fair Wear recommends to also collaborate with other customers.

#### Indicators on implementation: improvement and prevention



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	82%	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: In the past financial year, Marc O'Polo has received 12 audit reports. During the performance check, the member could demonstrate with a sample that more than two third of the CAP issues requiring improvement actions have been followed up. Resolved issues cover a range of matters, including grievance mechanisms, late payments, working hours, and safety concerns. When addressing Corrective Action Plan (CAP) findings, Marc O'Polo initially gathers documentation and feedback from the factory. Subsequently, the brand schedules a visit to the factory to follow up on each specific finding.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	4	6	-2

Comment: Marc O'Polo has identified the root causes of the CAP issues and discussed these with its suppliers. The member has started implementing preventive and mitigative actions to address some of these root causes. One recurring issue is that not all workers are aware on the topic of Freedom of Association (FoA) and Social Dialogue (SD). Marc O'Polo has discussed root causes with its suppliers and has conducted training to raise awareness. According to the brand the first preventative action for many root causes is awareness raising. With many of its factories enrolled in training and other training modules being planned, Marc O'Polo is making steady progress in addressing the identified root causes.



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

**Comment:** Marc O'Polo has some suppliers where improvement or prevention steps are not needed. However, the brands consider these suppliers as all other suppliers. The visit procedure has been changed and suppliers in these countries are part of the regular monitoring procedure. The brand sources from Portugal, Spain and Austria and commissions full assessments. These cover 7% of the member's total FOB.

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

Comment: In the previous year, nine reports of a total of 12 audit reports mention excessive overtime. Marc O'Polo analysed the root causes of these findings. According to the member the seasonality of the garments produced at its facilties is a significant cause for excessive overtime. The brand holds monthly meetings with suppliers or agencies to discuss and mitigate any human rights risks. It collaborates with its buying team to adjust order placements, allowing for increased flexibility to accommodate factory planning for material procurement. Additionally, Marc O'Polo utilises a system that enables order splitting in case of delays, with options to either accept the delay or opt for airfreight transportation. These actions resulted in a decrease in overtime.

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

Comment: In the previous year, several assessments and complaints included findings regarding non-payment of legal minimum wage or legally required wage elements. The brand promptly addressed these findings. Issues identified included discrepancies such as accurate working hours not being reflected on payslips, irregular payment of overtime, failure to maintain piece-rate wages, and non-payment of overtime premiums. Marc O'Polo took immediate action by engaging with the suppliers to rectify these issues and requested timely updates on the progress made which are kept in the supplier CAP progress overview. While the brand has showed that all issues were addressed, it seems that not all issues were fully remediated yet.

**Recommendation:** Fair Wear strongly recommends Marc O'Polo to always verify whether legal minimum wage issues have been resolved in case factory management claims so. Marc O'Polo 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.	Basic	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.	2	6	0

**Comment:** Marc O'Polo has a basic overview of the wage levels at its suppliers and has started discussing the topic of living wages with its suppliers.

**Recommendation:** Fair Wear recommends Marc O'Polo to enrol in the Living Wage programme on Fair Wear's learning platform. Members can help suppliers maintain their wage levels by, for instance, linking them to relevant governmental support programmes, or offering pre-payments or loans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Insufficient	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.	0	6	0

**Comment:** Marc O'Polo has started to address the topic of living wage internally but has yet to translate this to a operational strategy.

**Requirement:** Marc O'Polo should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

**Recommendation:** The member is recommended to create a operational strategy on how to finance wage increases. It is advised that the strategy is agreed upon by top management.

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.	0%	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.	0	6	0

**Comment:** Marc O'Polo does not contribute to higher wages at any of its production locations.

**Requirement:** Marc O'Polo is expected to begin setting a target wage for its production locations.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	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:** Marc O'Polo received six complaints in the past financial year, about employment is freely chosen, living wage, reasonable hours of work, safe & healthy working conditions and legally binding employment relationship at its suppliers in India, Bulgaria, Türkiye and North Macedonia. The member actively responded to these complaints as per Fair Wear's Complaints Procedure. The member brand has identified the root causes for the complaints and addressed them directly with the suppliers, also collecting evidence of remediation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Basic	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.	2	6	0

**Comment:** Marc O'Polo has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on no awareness on Code of Labour Practices (CoLP) and violence and harassment in the following training modules: Workplace Education Programme Violence and Harassment and the onboarding programme. Even though it is not part of a CAP, Marc O'Polo has implemented training Fair Price at one supplier in Bangladesh.

**Recommendation:** Marc O'Polo is recommended to implement training for all factories, also where this is not part of its improvement and/or prevention programme.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Basic	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.	2	6	0

**Comment:** Marc O'Polo followed up on the implemented training by addressing the training report as a corrective action plan. All topics that are mentioned are taken up with factory management, and in some cases, worker representation. There are still some training results that need to be addressed. The brand expressed that the training reports are helpful as they include the workers voice on the different topics.

**Recommendation:** We encourage Marc O'Polo to expand its follow-up.



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring 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:** Marc O'Polo's human rights risk monitoring includes a responsible exit strategy. In the past financial year, the member stopped with 31 suppliers. The member followed the steps in the responsible exit strategy. Marc O'Polo has not discussed the responsible exit strategy with all of its suppliers.

**Recommendation:** Marc O'Polo could discuss the responsible exit strategy with all of its suppliers, for instance as part of its supplier evaluation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

**Comment:** Marc O'Polo does not undertake activities related to human rights that go beyond Fair Wear's scope.

# Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

**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 and its human rights due diligence efforts.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

**Comment:** Marc O'Polo communicates accurately about Fair Wear membership on its website. The member brand has also developed materials about Fair Wear membership and shared it with retailers.

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: Marc O'Polo does not sell external brands.

Indicators related to brand and supply chain transparency

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Social report 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:** Marc O'Polo has submitted its social report, which Fair Wear approved. Marc O'Polo has also published the report on its website.

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

**Comment:** Marc O'Polo published its social report, which includes some factory-level data and remediation results, on its website. Marc O'Polo has yet to disclose its full factory list and its time-bound improvement plans.

**Recommendation:** Marc O'Polo is recommended to publish a complete factory list. Fair Wear recommends Marc O'Polo to publish time-bound plans for its suppliers.

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

**Comment:** Marc O'Polo has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. If that is not the case, the member adapts its approach, for instance, by offering specific training. The information used for this evaluation comes from full assessments that include worker and stakeholder input. Management is involved in the evaluation.

**Recommendation:** The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	0	4	-2

**Comment:** The previous performance check included the following requirements. The member brand was expected to illustrate the correlation between its purchasing prices and the wage levels at its facilities. Additionally, Marc O'Polo was required to identify the underlying reasons for wages falling below the living wage threshold. Although the brand has demonstrated the connection between its purchasing prices and wage levels, it still needs to determine why its purchasing prices do not meet the living wage standard.

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

### **Recommendations to Fair Wear**

Marc O'Polo has observed that some supervisor training sessions have been discontinued and aims to reinstate the programme, particularly focusing on women advancing to higher positions.

#### **Brand Performance Check details**

Date of Brand Performance Check: 17-01-2024

Conducted by: Jason Mandels

Interviews with: Sara Strödel - Group Manager Corporate Social Responsibility

Maximilian Böck - Chief Executive Officer Susanne Schwenger - Chief Product Officer

Isabelle von Watzdorf - Director Buying & Production

Lissa Erlenkötter - Division Head CSR & Product Sustainability

Albert Fetsch - Group Manager Corporate Communications & Public Affairs

Franziska Schumann – Senior Sustainability Manager