



## **Brand Performance Check**

**MANROOF GmbH**

**Publication date: January 2023**

This report covers the evaluation period 01-01-2021 to 31-12-2021

## About the Brand Performance Check

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

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

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

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

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

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

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

# Brand Performance Check Overview

## MANROOF GmbH

**Evaluation Period: 01-01-2021 to 31-12-2021**

Member company information	
Headquarters:	Zürich , Switzerland
Member since:	2008-01-01
Product types:	Promotional wear and accessories, Bags
Production in countries where Fair Wear is active:	Bulgaria, China, India, Turkey
Production in other countries:	Austria, Germany, Greece, Italy, Poland, Portugal, Slovenia, Spain, Switzerland
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	73%
Benchmarking score	23
Category	Needs Improvement

## Summary:

MANROOF GMBH (Manroof) has shown insufficient progress on the performance check indicators, leading to a benchmark score of 23 points. Manroof scored the second time insufficient in compliance indicators. As a result, Manroof is placed in the 'Needs Improvement' category. Manroof has monitored 73% of its supply chain. Fair Wear strongly advises Manroof to improve its CSR activities and set up a sufficient monitoring system.

## Corona Addendum:

MANROOF GMBH (hereafter Manroof) is a promotional brand, which means the product range is vast. Manroof's main products are custom-made and stock garments such as lanyards, T-shirts, caps, bags, and other textile products. All goods are manufactured on demand, mainly in Greece (responsible for 39% of the member's FOB) and China (35% of the member's FOB). However, the additional products are the reason for a long list of production facilities where the brand has low leverage and fewer possibilities for improvements.

COVID-19 was still a challenge for Manroof; due to some restrictions, travel was not possible and direct dialogue with the suppliers was difficult for the CEO. In 2021 there were fewer issues in general than the year before. Manroof and its factories made less turnover, leading to fewer orders, but Manroof did not have to use short-time work and did not terminate staff. The brand's suppliers also did not terminate workers and paid the wages. Due to a problematic transport situation in Asia, Manroof increased its European production to maintain stability. In case of delays, Manroof was lenient with its suppliers and exchanged with its customers, asking for understanding.

In 2021 no Fair Wear audit took place. External consultants conducted visits at three factories in China and India. Manroof's external consultants were responsible for the central part of the monitoring in China, India, Greece, and Turkey, but not on a regular, systematic basis. Manroof's systems were not sufficiently able to identify, address and remediate the most critical issues at its suppliers. After lockdowns in Turkey and India, the brand contacted its suppliers but did not ask for proof that suppliers paid wages correctly. In general, Manroof did not conduct the COVID-19 follow-up regularly. Manroof offered its biggest supplier in China financial support during COVID-19.

Fair Wear recommends that Manroof sets up a general HRDD system, including regular monitoring, CAP follow-up, and updating its risk assessment regularly and on-demand. Besides, linking the risks to its suppliers and defining actions to prevent and mitigate supplier- and country-specific risks such as excessive overtime, forced labour, migrant labour and the lack of social dialogue, freedom of association and collective bargaining.

## 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.

# 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	0%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	0	4	0

**Comment:** Manroof sells promotional products and buys a wide variety of products from many suppliers. Manroof did not buy at least 10% production capacity at any of its suppliers in 2021. It is a significant drop from last year when this value was 52%.

**Requirement:** Fair Wear advises Manroof to consolidate its supplier base where possible and increase leverage at its main production locations to request improvements in working conditions effectively. Fair Wear encourages Manroof to define the consolidation process in a sourcing strategy agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	18%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	2	4	0

**Comment:** 18% of Manroof's production volume comes from locations where it buys less than 2% of its total production volume. This is the case for 30 out of 35 of Manroof's active suppliers in 2021. Manroof produces a wide variety of product types to be able to offer a "full package" to its customers. As the products are very different, Manroof needs various suppliers for each product. Manroof is aware that a long "tail-end" is not ideal when influencing suppliers' social standards and significantly increases the administrative burden. However, Manroof does not see a way to further decrease the number of suppliers.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	38%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	2	4	0

**Comment:** Manroof has a long-term relationship of at least five years with 14 of its 35 suppliers, which amounts to 38% of its production volume. Manroof decided to onboard seven new suppliers in 2021 due to COVID-19. The strategy was to move more production from China to Europe to reduce risks and delivery time. The onboarding of new suppliers led to a significant drop from 62% in 2020. The detailed description of the onboarding process is in indicator 1.4.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	0	2	0

**Comment:** All questionnaires from active locations (subcontractors) are missing, and the questionnaire from one supplier in Austria. There is no adequate system in place.

**Requirement:** Manroof must ensure that new production locations sign and return the questionnaire before placing first orders. This requirement also applies to subcontractors. Fair Wear advises Manroof to define the use of subcontractors in a policy and discuss it with the suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Insufficient	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	0	4	0

**Comment:** Before a new supplier is onboarded, Manroof sends the COLP questionnaire and asks about existing audits. The member did not write the onboarding process down in 2021. Manroof has developed a risk map for China, India, Turkey and the whole EU. The risk map scores the compliance with the Fair Wear Code of Labour Practices (CoLP) from 1-10. The map further outlines some specific country risks according to Fair Wear country studies and the experience of Manroof. The member increased its sourcing volume from Europe due to transportation issues from Asia caused by COVID-19 last year. The CEO has the final say regarding sourcing decisions. Manroof used the Fair Wear country studies to identify country-specific risks. The member demonstrated awareness of some general country-specific risks in China, India, and Italy. The CEO shares this information among relevant staff members. In 2021 Manroof added seven new production facilities, three in China and one in Bulgaria, Germany, Italy, and Spain. During the performance check, Manroof did not demonstrate sufficiently the follow-up on COVID-19 specific country risks at its suppliers.

**Requirement:** Manroof is required to conduct a risk assessment of the impact of COVID-19 on its suppliers, identifying the most urgent issues per supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0

**Comment:** Manroof did not conduct a systematic evaluation in 2021, which should provide broader insight and look into a wide range of present criteria, which in turn should lead to sourcing decisions. The member does not follow a responsible exit strategy. Manroof does not inform its suppliers appropriately if the cooperation ends. During COVID-19, there was no close or systematic follow-up with Manroofs suppliers regarding the impacts of the pandemic. Manroof sent a COVID-19 checklist to some of its suppliers and received information from its external consultants for China and India but not on a regular base. There was no cancellation of orders on the part of Manroof in 2021. Manroof did place less orders due to fewer requests from customers. In 2021 there was a lockdown in India and Turkey. Manroof stated that there were no issues regarding COVID-19 in 2021. In general, Manroof relied on and trusted the information given to them by its suppliers without collecting additional evidence to support it.

**Requirement:** A systematic approach is required to integrate social compliance into standard business processes and supports responsible decision-making. The system must ensure that Manroof consistently evaluates the entire supplier base and includes information in decision-making procedures.

The member should frequently communicate with its suppliers about the impact of the COVID-19 crisis. Manroof should check whether other clients have cancelled orders and what kind of support suppliers need.

**Recommendation:** Fair Wear strongly recommends that Manroof collect evidence from its suppliers to demonstrate that workers receive at least legal minimum wage during lockdown times. Collecting proof should not be seen as not trusting the supplier but rather as a part of a solid risk-based approach to strengthen its approach to remediation on areas of the utmost importance. Payment of legal minimum wage at all times is one of these crucial areas where evidence is needed.

Fair Wear encourages MANROOF GmbH to implement a responsible exit strategy and ensure all relevant staff is informed about this. Please see [<https://api.fairwear.org/wp-content/uploads/2020/09/Fair-Wear-Responsible-Exit-Strategy-Guidelines-V1.0.pdf>].

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** The lead times of Manroof depend on the product, order quantity and if the supplier is in Europe or Asia. The lead time for smaller quantities is three to four weeks, and for higher amounts, four months (by sea). If the supplier needs more time for production, Manroof informs its customer, but often customers cannot extend the delivery date. Therefore Manroof tried to work with partial shipments and paid for the airfreight in case of delivery delays. Manroof asks its clients to place orders as early as possible to avoid creating pressure on its suppliers. As Manroof is producing promotional articles, the orders it receives are not stable, and there is no year plan. During COVID-19, Manroof benefited from its increased production capacity in Europe and its proximity, which led to shortened lead times, made the company less dependent on China, and reduced the risk of overtime. In the case of force majeure, Manroof shared the risk with its customers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	0	6	0

**Comment:** Audits conducted at two factories of Manroof in China during 2019 and 2020 revealed several overtime findings. Even with the influence of the pandemic, which slowed down orders and generally made deliveries less urgent, excessive overtime was still a significant problem. One audit finding indicated overtime from 60 to 90 working hours per week. Another finding revealed missing attendance records, which made it impossible to verify actual working hours. The factory only registered times in the morning and evening without breaks. Manroof addressed the findings to its suppliers but did not follow up regularly. The findings are still open.

**Requirement:** With a high risk of excessive overtime in its supply chain due to the COVID-19 pandemic, the member needs to monitor suppliers more actively on excessive overtime. Manroof should actively follow up on the existing findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in 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.	2	4	0

**Comment:** To compare prices, Manroof sends order requests to several suppliers. Manroof works with three agents and does not have an agreement with them that ensures that prices allow payment of at least the legal minimum wage. Manroof used the wage data of the three Fair Wear audits done for suppliers in China and India since 2019. Manroof has estimates on how many minutes are needed to produce its different products but has not yet calculated the labour minute costs. There were no conversations with suppliers related to the added costs that would potentially follow when implementing the additional occupational health and safety (OHS) measures. Fair Wear expects its members to know at least how COVID-19 restrictions and OHS measures would have affected production prices and how this would link to workers' wages.

**Requirement:** Manroof should engage in a dialogue with the supplier about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into the prices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

**Comment:** One of Manroof's Chinese factories did not have the wage records for 30 finishing workers managed by a labour contractor. As per the interview, the finishing workers were paid 8.8 to 9 RMB/hour for all working hours, which was below the local minimum wage of 11.61 RMB/hour during that time. Manroof could not demonstrate adequate follow-up with the factory has been done to resolve this finding.

In 2021 India and Turkey conducted lockdowns. Manroof did not analyse the risks and did not collect payslips for all countries with high risk.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

In the context of COVID-19, Fair Wear expects Manroof to do its own analysis of the risks related to non-payment of minimum wage in its sourcing countries and connect the risk (for example, long-term factory closure in a country) to its suppliers. When suppliers indicate no problem in paying legal minimum wages while it is a high-risk area, the member is expected to request evidence of wages paid.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** Manroof is prepaying most of its orders. During COVID-19, Manroof did not change its payment terms.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** Manroof is addressing the topic of living wage with at least two of its suppliers. Manroof has maintained its involvement in these two factories but has not expanded its approach further due to COVID-19, which has made it difficult to bring the issue of living wages up when talking with suppliers.

**Recommendation:** Fair Wear encourages Manroof to discuss different strategies to work towards higher wages with suppliers. Fair Wear advises Manroof to start with suppliers where the member is responsible for a large percentage of production and long-term business relationship.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	6	0

**Comment:** Manroof took significant steps towards paying its share of a living wage at its biggest supplier in China. The company calculated the gap between the current wages of the workers and the living wage estimate stated by the Global Living Wage Coalition (a.k.a Anker Methodology). Manroof agreed with the factory to pay 75% of the gap in 2021 of Manroof's leverage. The goal is to move Manroof's share to cover 100% in the coming year. At some of Manroof's remaining suppliers, the leverage is either too small, the business relationship too short, or the order volume too unstable to start serious efforts to implement living wages.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	57%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	4	6	0

**Comment:** Manroof has made significant progress in financing the target wage at one of its key suppliers. At the biggest supplier in China, where Manroof purchases 28% of its total production volume, the brand pays 75% of the wage gap up to a living wage. Manroof defined the living wage according to the existing Anker figures and could show the payment proof of its share. The overall percentage comes to 57%, excluding low-risk production volume.

---

## Purchasing Practices

**Possible Points: 52**

**Earned Points: 16**

---



## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	33%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	40%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	All factories must be visited by Manroof staff at least once every three years. During factory visits, Manroof must discuss labour conditions and the use of subcontractors, as well as document the outcomes of the discussion. The brand must complete and file the Fair Wear health and safety checklist for Fair Wear to assess during a Brand Performance Check. Manroof can collect existing audit reports from the production sites to ensure the most up-to-date information on working conditions.	
Total monitoring threshold:	73%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	No	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	-2	2	-2

**Comment:** In 2021 Manroof worked with external CSR consultants in China, India, Turkey and Greece. There is no sufficient monitoring system to identify problems and follow up regularly. For the suppliers in other countries, Manroof's CEO is responsible for the follow-up.

**Requirement:** Manroof should designate a person with sufficient capacity and resources to follow up on problems identified by the monitoring system.

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	0	-1

**Comment:** Member makes use of Fair Wear audits and/or external audits only.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No Corrective Action Plans were active during the previous year	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	N/A	2	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Insufficient	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	-2	8	-2

**Comment:** Manroof's external CSR consultants are responsible for monitoring the follow-up of the Corrective Action Plans in China, Turkey and India. They share proof of improvements with Manroof and update the CAP reports and the remediation status of the issues. Manroof stores the evidence (photos, emails, documents) on its server. Manroof has no adequate system for regular and efficient CAP follow-up. Hence, many findings are still open, as the deadline passed a long time ago. In 2021 very little was done on the part of Manroof to identify COVID-19-related impacts in its supply chain. Therefore Manroof could not sufficiently demonstrate the remediation of these issues. The follow-up with suppliers took place in the form of phone calls. According to Manroof, its main manufacturing site reported only the cancellation of orders from other clients as an issue.

Manroof offered support, which the supplier stated as being "not needed", but did not take steps to ask for evidence. This step would have verified if workers were still receiving legal minimum wage or if the suppliers had implemented the COVID-19 measures to limit the pandemic's spread.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Resolving and remediating non-compliances is one of the most essential criteria member companies can do to improve working conditions. Fair Wear expects Manroof to examine and support remediation of any problem they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

**Recommendation:** Fair Wear recommends establishing systems to monitor; resources need to be sufficient. Besides, Fair Wear also recommends that Manroof gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	1	3	0

**Comment:** Manroof collects audit reports from Amfori/BSCI, GOTS, and Sedex. Manroof uses the findings to get a general impression of the working conditions at its suppliers. Manroof did not assess the quality of the reports by using Fair Wear's audit quality assessment tool and did not create a CAP.

**Recommendation:** Fair Wear recommends that Manroof conducts a quality assessment, creates a CAP and systematically follows up on findings when collecting external audit reports and document improvements made on these findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	1	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Manroof is aware of the general risks in its production countries and has made a risk map where some risks are listed.

#### Turkey:

In 2021, Manroof could not monitor its two suppliers in Turkey. No audits and training took place within the last three years. Manroof has minimal leverage of around 1% at both of these suppliers. Manroof has sent out a policy on Syrian refugees working at Turkish garment factories to its suppliers but could not show the suppliers' confirmation of the policy. Manroof was unaware of the risk of subcontracting and, therefore, was not investigated further.

In 2021 Turkey had a lockdown of two weeks, and textile garment factories were to stay open. Manroof did not communicate this lockdown further with its partner.

#### India:

Manroof is working with an external CSR representative who contacted the supplier. For a visit in 2021, no proper Health and Safety document is available. Manroof conducted a Fair Wear Work Education Programme "Violence and Harassment Prevention" training.

During the partial lockdowns in India, the member asked about the situation and received information from the supplier that workers were partially at home. The supplier still paid wages and did not terminate workers. Manroof could not show proof of this in terms of salary slips from workers.

#### China:

Through its local CSR representative, Manroof is generally aware of the country-specific risks related to China. The local CSR representative only worked some months for Manroof in 2021 and therefore kept in contact with some factories via phone.

Regarding COVID-19, Madness had no systematic follow-up and could not show evidence proving that occupational health and safety measures were sufficiently implemented at any suppliers of Manroof. Manroof followed up once in 2021 but did not record the collected replies systematically. The overall message Manroof received was that its suppliers did not need financial support.

Fair Wear has concluded that the efforts of Manroof in identifying, managing and remediating risks related to COVID-19 were insufficient overall and did not improve from the year before.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

Manroof monitoring system should identify and address high-risk issues that are specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies.

**Recommendation:** Manroof is advised to discuss with its suppliers which support they can provide in implementing OHS measures in response to COVID-19.

Fair Wear further strongly advises Manroof to conduct systematic follow-up, track the replies received from its suppliers, and collect evidence that clearly shows that wages were safe-guarded during lock-down periods and that sewerage was paid according to the law if dismissals took place as a result of COVID-19.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

**Comment:** Manroof has no shared production locations with other Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	79%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

**Member undertakes additional activities to monitor suppliers.:** No (o)

**Comment:** Manroof collected the signed questionnaires and proof of the posted Worker Information Sheets (WIS) for almost all its suppliers in low-risk countries. In 2021 Manroof did not visit suppliers in low-risk countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	1	2	0

**Comment:** Manroof sent the questionnaire to all its external brands resold by the member company.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	10%	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	1	3	0

**Comment:** Three of Manroof's external producers are Fair Wear members, accounting for 10% of Manroof's external sales volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0



---

## Monitoring and Remediation

**Possible Points: 27**

**Earned Points: 2**

---

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	0	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** Manroof's CEO is responsible for addressing worker complaints if any are received.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

**Comment:** Manroof and its local consultants check during visits to some suppliers whether the supplier posted the Worker Information Sheets (WIS) at accessible locations in the factory. The member and the local consultant had limited possibility of making visits in 2021. Manroof could not show the posted Worker Information Sheet at many subcontractors and in the rest of its production countries.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

Manroof must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories, in a location that is accessible to all workers. Manroof should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

---

## Complaints Handling

**Possible Points: 3**

**Earned Points: -1**

---

## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** Fair Wear membership is discussed regularly in meetings with all staff. New employees are trained on Fair Wear membership and requested to read the social report. All employees know about the benefits of ordering from Manroof and the difference between Fair Wear and other initiatives in the field of social sustainability.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** Staff in direct contact with suppliers are informed about Fair Wear requirements by emails, meetings, and documents on Manroof's server. As the team is relatively small, the exchange of information happens in an informal way on an ad-hoc basis.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	1	2	0

**Comment:** Manroof has one agent in China and two agents in Portugal. These agents are supporting the awareness raising of the Fair Wear Code of Labour Practises (CoLP) on a very basic level. Orders through these agents are relatively small and unstable, so the agents have not yet started to conduct workshops at suppliers to facilitate the improvement process. At Manroof, there is a policy to intensify improvements via audits, workshops and visits at suppliers when Manroof gets a minimum of five percent leverage. The brand only implemented the basics for any smaller leverage, such as the Fair Wear questionnaire with the CoLP, the Worker Information Sheet and the gathering of external audit reports.

**Recommendation:** Manroof delegates CAP follow-up and monitoring to agents; it should inform them about the Fair Wear COVID-19 guidance and ensure agents are enabled to monitor the impact of COVID-19 on suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No follow-up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	0	2	0

**Comment:** Manroof did not follow up after a WEP Violence and Harassment Prevention at its supplier in India in 2021.

**Requirement:** Fair Wear requires MANROOF GmbH to discuss the outcome of advanced training with its supplier and agree on the next steps, such as regular dialogue or committee meetings.

---

## **Training and Capacity Building**

**Possible Points: 7**

**Earned Points: 4**

---

## 5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Insufficient	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	-2	6	-2

**Comment:** Manroof was unaware that specific products also fall under the Fair Wear scope due to the brand's broad product range. Therefore factories were missing and not uploaded to the Fair Wear database for 2021. Besides, all subcontractors were missing, like the embroidery and printing facilities used by Manroof's suppliers. There is no system in place to identify all production locations. Furthermore, no policy regarding the use of subcontractors is in place.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

After the end of each financial year, Manroof must confirm its list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1



**Comment:** For each supplier, Manroof stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails in an informal way.

---

## Information Management

**Possible Points: 7**

**Earned Points: -1**

---

## 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Manroof communicates about Fair Wear on its website as well as via brochures and on social media.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

**Comment:** Manroof publishes the most recent performance check report, member confirmation letter, a brochure and relevant Fair Wear country study on its website. Manroof did not disclose any of its production facilities internally to other Fair Wear members or publicly on the Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

**Comment:** Manroof has submitted the social report to Fair Wear. The social report is published on Manroof's website.

## Transparency

**Possible Points: 6**

**Earned Points: 5**

## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The CEO and other relevant staff evaluate Fair Wear membership in an informal and ad-hoc way. Manroof uses the performance check to set priorities for the year ahead.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	0%	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 company should show documentation related to the specific requirements made in the previous Brand Performance Check.	-2	4	-2

**Comment:** Manroof has made insufficient progress on all five requirements Fair Wear gave in the previous performance check.

**Requirement:** Manroof is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check. For repeated non-compliance in these indicators, improvement is required within one year.

---

## Evaluation

**Possible Points: 6**

**Earned Points: 0**

## Recommendations to Fair Wear

Manroof would appreciate more direct support from its brand liaison to fulfil the Fair Wear criteria than Fair Wear generally gives to its members. Manroof is unhappy with the shift to risk-based working and feels the performance check could be a better tool to assess the brand's efforts adequately.

# Scoring Overview

Category	Earned	Possible
Purchasing Practices	16	52
Monitoring and Remediation	2	27
Complaints Handling	-1	3
Training and Capacity Building	4	7
Information Management	-1	7
Transparency	5	6
Evaluation	0	6
Totals:	25	108

Benchmarking Score (earned points divided by possible points)
23

Performance Benchmarking Category
Needs Improvement

## Brand Performance Check details

Date of Brand Performance Check:

17-08-2022

Conducted by:

Adele Kolos

Interviews with:

Jacques van Mandach (CEO / CSR)

Chenyan Liu (external CSR consultant for China)