

Brand Performance Check Mayerline NV

Publication date: August 2020

This report covers the evaluation period 01-02-2019 to 31-01-2020

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. The online Brand Performance Check Guide provides more information about the indicators.

Brand Performance Check Overview

Mayerline NV

Evaluation Period: 01-02-2019 to 31-01-2020

| Member company information | |
|--|---|
| Headquarters: | Brussel , Belgium |
| Member since: | 2010-03-14 |
| Product types: | Garments, clothing, fashion apparel |
| Production in countries where Fair Wear is active: | China, India, Tunisia, Turkey |
| Production in other countries: | Hong Kong, Italy, Latvia, Lithuania, Pakistan, Portugal, Russian Federation |
| 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 | 83% |
| Benchmarking score | 52 |
| Category | Good |

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

Mayerline has shown progress on Fair Wear's performance requirements. With a benchmarking score of 52 and a monitoring percentage of 83% (meeting the requirement for brands with 3+ years of Fair Wear membership), it returns to the 'Good' category.

In the past financial year, Mayerline put a lot of effort into ensuring more transparency in its supply chain. This has resulted in signed and returned questionnaires, Worker Information Sheets being posted, and insight into all production locations, both in low-risk countries as well as in other production countries. Also the due diligence process has improved, ensuring that Mayerline will be better prepared for remediation going forward.

However, Mayerline continues to faces challenges in meeting minimum requirements for Fair Wear membership. Due to the high workload and minimal support from within the company, the CSR Manager is not able to properly follow-up on audits and Corrective Action Plans. At the moment the company's production planning is not contributing to reasonable working hours. Fair Wear expects Mayerline to maintain a forecasting system and production planning system that enables good planning at production level and avoids late design or quality changes, as well as help to limit the effects of peaks in demand.

Also, the company has limited insight into how the current prices relate to wages. Fair Wear recommends Mayerline to expand their knowledge of cost breakdowns of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to the brand's buying prices. First priority would be to make sure this level of transparency can be achieved with Mayerline's suppliers.

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. | 71% | 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. | 3 | 4 | 0 |

Comment: 71% Of Mayerlines production volume comes from production locations where it buys at least 10% of production capacity. 35% of the total production volume is placed in low risk countries.

Mayerline is in the process of consolidating its supply chain, this is not yet explicitly formulated in a sourcing strategy though.

Mayerlines financial year that is assessed runs from February 2019 to end of January 2020.

| 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. | 12% | 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: 12% of the production volume comes from locations where Mayerline buys less than 2% of its total FOB.

| 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. | 63% | 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. | 3 | 4 | 0 |

Comment: Mayerline prefers to work in long-term relationships, as it takes time to reach optimal quality. It has a steady and long term relationship with suppliers that takes up 63% of its production volume.

| 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. | Yes | 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. | 2 | 2 | 0 |

Comment: All new production locations are required to sign and return the questionnaire before bulk orders are placed. In the past financial year Mayerline improved the internal process to ensure new production locations are not entered into the system before all required documentation has been received. Only when the location is in the system can an order be placed. All necessary information for new production locations was in place.

| 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. | Advanced | 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. | 4 | 4 | 0 |

Comment: Mayerline conducts risk assessments for potential new sourcing countries. It's important to Mayerline to check the risks in the garment supply chain before it engages with a supplier in that country. This exercise is meant to assess which risks can be expected and whether Mayerline would be able to manage these. For countries where Fair Wear is active, the country study provides the most information. If that is not available, the member uses the Risk Checker of MVO-Platform. If the member concludes it won't be able to manage, the conclusion is that no production will be started in that country. For this reason, Myanmar, Ethiopia, and Uzbekistan have fallen of Mayerline's radar.

The decision of on-boarding a new supplier is a joint responsibility of the Head of Product and the CSR Manager. The Head of Product takes the lead in the decision about whether on-boarding a new supplier is necessary and acceptable, based on production necessities.

After the Head of Product has expressed its' desire to add a new factory, the case is handed over to the CSR Manager who needs to give a final go.

A new supplier will only be accepted when 1. There is a clear need to add a new production location. 2. The factory information sheet is completed. This includes the production processes that are being done in-house. 3. The management of the new factory has signed the Fair Wear Code of Labour Practices. 4. The Worker Information Sheet is posted on the work floor. 5. A recent audit report and CAP are requested, and Mayerline assesses the state of progress. 6. When special risks are applicable, Mayerline asks the supplier to sign a letter of guarantee, which is a way to make suppliers aware of these risks. For example regarding the Sumangali Scheme in India. 7. The supplier has disclosed information about tier 2 suppliers and these suppliers have signed the Fair Wear CoLP and posted the Worker Information Sheet.

| 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. | Yes | 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. | 1 | 2 | 0 |

Comment: Mayerline has a supplier rating system that evaluates all audit reports by all labour standards. The evaluation is shared with the responsible buyers to be discussed with the suppliers. At the moment the rating system has not led to production decisions yet.

Recommendation: Mayerline is encouraged to integrate social compliance in the supplier rating system in which quality, relationship, and communication are assessed is one system. CSR should be weighted equally to other criteria. While it is important to look at the different labour standards when evaluating CoLP compliance, the commitment to cooperate and resolve issues should at least be equally important.

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

Comment: In the production process Mayerline works closely together with its main production location in Lithuania. However, this means that information needs to be double checked before production can actually start. Throughout the process Mayerline maintains close contact with the suppliers, but at the moment does not take supplier capacity into account, neither does the company adjust the planning when problems arise.

Requirement: A production planning system can have a significant impact on the levels of excessive overtime at factories. Mayerline should maintain a forecasting system and production planning system that enables good planning at production level and avoids late design or quality changes, as well as help to limit the effects of peaks in demand.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|-------------------------|--|--|-------|-----|-----|
| 1.7 Degree to which member company mitigates root causes of excessive overtime. | Intermediate 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. | 3 | 6 | 0 |

Comment: Several audits point out excessive overtime. Mayerline's CSR manager has started to discuss root causes and several production locations have indicated that the current planning process Mayerline works with, is not working well. It is outdated and not flexible. Quite often suppliers are forced to squeeze in Mayerline production, which results in overtime. To address this, Mayerline's CSR manager has reached out to the Sourcing Manager at JBC (part of the same holding) to discuss the possibility to improve the system.

Recommendation: Mayerline could develop instruments or policies to deal with possible delays to avoid excessive overtime. Those instruments could include being flexible with delivery dates, prioritizing orders, offer support/flexibility for material delivery, ordering in low season, keeping stock etc. The outcomes of the root cause analysis can be used for identifying strategies that minimise the impact of its sourcing practice on working hours at other factories.

| 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 | ο |

Comment: Mayerline works with CMT and therefore can differentiate between material costs and the rest; overhead, labour costs, profit margin. Further differentiation is not available, and there are no suppliers with whom Mayerline works based on open costing.

Prices quoted by suppliers are accepted, and via the audit reports the member checks whether Legal Minimum Wage is paid. Mayerline does not like to work with requesting price discounts when there are problems such as late delivery or quality deviations and accepts the same price for repeat orders.

Recommendation: Fair Wear recommends Mayerline to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. First priority would be to make sure this level of transparency can be achieved with their suppliers.

| 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 problems reported/no audits | 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. | N/A | 0 | -2 |

| 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 |

| 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. | Insufficient | 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 | 0 | 6 | 0 |

Comment: Mayerline has neither assessed nor responded to root causes for wages that are lower than living wages in production locations. Suppliers are hesitant to share details on what they are paying to workers.

Requirement: Mayerline must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. Mayerline is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

| 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. | None | 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. | 0 | 6 | 0 |

Comment: Mayerline has not determined and financed wage increases yet.

Requirement: Mayerline should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

| 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. | 0% | 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. | 0 | 6 | O |

Comment: Even though Mayerline is not actively working on living wages, the audit of December 2018 at one of their Chinese suppliers found that a few of the wage samples that were looked into show that these workers are being paid the Asia Floor Wage or more. As most workers in this location do not earn a living wage, this location is not included for this indicator.

Purchasing Practices

Possible Points: 52

2. Monitoring and Remediation

| Basic measurements | Result | Comments |
|--|---|--|
| % of production volume where approved member own audit(s) took place. | 0% | |
| % of production volume where approved external audits took place. | 25% | |
| % of production volume where Fair Wear audits took place. | 25% | |
| % of production volume where an audit took place. | 50% | |
| % of production volume where monitoring requirements for low-risk countries are fulfilled. | 33% | 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 | | t all production locations where they produce more than 2% e they are responsible for over 10% of total production. |
| Total monitoring threshold: | 83% | 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. | 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. | 2 | 2 | -2 |

Comment: The CSR manager is the end responsible and gets informed by the Lithuanian and Chinese Quality Control staff.

| 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 |

| 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 | 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. | -1 | 2 | -1 |

Comment: In the past financial year Mayerline one Fair Wear audit was conducted at a production location. Due to email overload, this audit has not been shared with the production location by Mayerline.

| 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. | Basic | 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. | 4 | 8 | -2 |

Comment: Mayerline uses both Fair Wear audits as well as external audits to monitor and improve the labour situation at production locations. During the performance check the company showed follow-up and some progress towards resolution of existing Corrective Action Plans.

Recommendation: Fair Wear strongly recommends to ensure that the size of the supply chain and the available resources of Mayerline to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the amount of resources needed for active follow up.

| 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. | 38% | Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices. | Member companies should document all production location visits with at least the date and name of the visitor. | 2 | 4 | O |

Comment: In the previous financial year, Mayerline or its representatives visited production locations responsible for 38% of production. In addition, all factory management visited Mayerline Head Quarters.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--|---|---|-------|-----|-----|
| 2.6 Existing audit reports from other sources are collected. | Yes, quality assessed and corrective actions implemented | 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. | 3 | 3 | O |

Comment: Mayerline collects external audit reports and assesses the quality as part of the on-boarding and due diligence process. For 7 production locations Mayerline did also follow-up on the external audit reports, which means these count towards the monitoring threshold.

| 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. | 5 | 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 | Advanced | | | 6 | 6 | -2 |
| Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees | Intermediate | | | 3 | 6 | -2 |
| Other risks specific to the member's supply chain are addressed by its monitoring system | Advanced | | | 6 | 6 | -2 |

Comment: Mayerline sources jeans only from their Tunisian supplier that has been audited by Fair Wear in the past. The Head of Products has worked with this facility for over 20 years. Mayerline has a policy that sandblasting is forbidden, which is part of the quality manual that suppliers receive. Alternative methods that are used are chemicals and sandpaper. Mayerline checks that PPEs are used and the processes are taking place in open and well-ventilated spaces.

Mayerline sources from two production locations in Turkey. The suppliers were sent information about the Fair Wear Turkey policy regarding Syrian workers. The CSR manager visited the production locations and discussed the topic of Syrian refugees as well. In addition, the importance of transparency of production locations was discussed and monitored. As the Turkish suppliers have not received any trainings, full points cannot be awarded.

Mayerline keeps up to date on general risks in all its production countries. For India and Italy specifically the company has a document outlining the highest risks. These documents have been shared and discussed with the production location and signed to make sure the supplier understands and cooperates to prevent issues related to these risks.

| 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: Due to limited financial means Mayerline is a bit reluctant to do joint remediation, as they will not be able to chip in or return the favour. However, the company is in touch with other brands about shared suppliers and will share information on remediation if possible.

| 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. | 87% | 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 |

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|------------------------|---------------|-------|-----|-----|
| Member undertakes additional activities to monitor suppliers. | Yes | | | 1 | 1 | 0 |

Comment: 39% of the total production volume is placed in low risk countries, spread over 11 suppliers. All suppliers have returned a signed questionnaire and posted the worker information sheet. Mayerline has visited 7 production locations in the past three years. This means that for 87% of the production in low-risk countries the monitoring requirements are fulfilled.

One production location in Lithuania has also been audited.

| 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 |

Comment: Mayerline has not audited all production locations where it buys over 2% of total FOB or where it is responsible for more than 10% of production and therefore this indicator does not apply.

| 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. | No external brands resold | 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. | N/A | 2 | 0 |

| 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). | No external brands resold | 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. | N/A | 3 | 0 |

| 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: 28

3. Complaints Handling

| Basic measurements | Result | Comments |
|---|--------|--|
| Number of worker complaints received since last check. | 1 | 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. | 1 | |

| 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: Mayerline has a designated staff member that follows-up and addresses worker complaints.

| 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. | Yes | 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: For all production locations Mayerline was able to show worker information sheets were posted.

| 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. | 0% | 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 workermanagement 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. | 0 | 6 | 0 |

Comment: None of Mayerline's production locations participated in WEP training or other activities to raise awareness among workers and management on the Fair Wear Code of Labour Practices and complaints helpline.

Requirement: Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. Mayerline should ensure good quality systematic training of workers and management on these topics. To this end members can either use Fair Wear's Workplace Education Programme (WEP) basic module, or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear's guidance on training quality standards is available on the Member Hub.

| 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. | Yes | 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. | 3 | 6 | -2 |

Comment: Mayerline received one complaint and responded to it in line with Fair Wear's Complaints Procedure.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|-----------------------|--|--|-------|-----|-----|
| 3.5 Cooperation with other customers in addressing worker complaints at shared suppliers. | Active cooperation | 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. | 2 | 2 | 0 |

Comment: Mayerline cooperated with another Fair Wear member in addressing the complaint in a joined factory.

Complaints Handling

Possible Points: 17

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: The CSR Manager has meetings with Lithuanian and Chinese QC and with CEO and Head of Products. While staff knows about Fair Wear membership, Mayerline recognises that knowledge can be enhanced and aims to organise training for all staff, conducted by the CSR manager.

| 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: The Lithuanian and Chinese QC and Head of Products are informed by the CSR manager, and procedures are written down.

| 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: Mayerline works with different agents. They have been informed about Fair Wear's Code of Labour Practices.

| 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. | 0% | 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. | 0 | 6 | 0 |

Comment: Suppliers have not been enrolled in training that supports transformative processes.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--|---|--|-------|-----|-----|
| 4.5 Degree to which member company follows up after a training programme. | No training programmes have been conducted or member produces solely in low-risk countries | 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. | N/A | 2 | 0 |

Training and Capacity Building

Possible Points: 11

5. Information Management

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|----------|---|--|-------|-----|-----|
| 5.1 Level of effort to identify all production locations. | Advanced | 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. | 6 | 6 | -2 |

Comment: In the past financial year Mayerline improved insight into the supply chain, knowing all production locations and explaining the importance of transparency on production locations. None of the audits or visits indicated unknown subcontractors.

| 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: Top management is updated when there are severe problems. The CSR manager has monthly meetings with the Head of Production and has had regular calls with QC staff in Lithuania and China to inform them about all steps they need to take to monitor production locations.

Information Management

Possible Points: 7

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: Information about Fair Wear membership is shared in catalogues and brochures and during company presentation. After Mayerline had to remove communication from its website it did not put information back up.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------|---|--|-------|-----|-----|
| 6.2 Member company engages in advanced reporting activities. | No | 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. | 0 | 2 | 0 |

Comment: Mayerline does not publish any information about its supply chain on its 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 | 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. | 1 | 2 | -1 |

Transparency

Possible Points: 6

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 CSR manager has a quarterly meeting with the mother company on CSR performance of Mayerline. In these meetings, the vision for the direction of CSR is discussed. The outcome of these meetings is to continue the sustainability activities and deepen the efforts. Meetings with the CEO have mostly been focused on how to improve procedures.

| 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. | 63% | 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. | 4 | 4 | -2 |

Comment: In the past financial year Mayerline has put a lot of effort in ensuring more transparency in its supply chain. This has resulted in signed and returned questionnaires, Worker Information Sheets posted, and insight in all production locations, both in low-risk countries as well as in other production countries. This addressed 5 of the 8 requirements of last year.

Evaluation

Possible Points: 6

Recommendations to Fair Wear

Mayerline would like to get more hands-on and practical support in addressing remediation at production locations, specifically when it comes to more difficult topics such as living wages or freedom of association.

Scoring Overview

| Category | Earned | Possible |
|--------------------------------|--------|----------|
| Purchasing Practices | 20 | 52 |
| Monitoring and Remediation | 18 | 28 |
| Complaints Handling | 8 | 17 |
| Training and Capacity Building | 4 | 11 |
| Information Management | 7 | 7 |
| Transparency | 3 | 6 |
| Evaluation | 6 | 6 |
| Totals: | 66 | 127 |

Benchmarking Score (earned points divided by possible points)

52

Performance Benchmarking Category

Good

Brand Performance Check details

| Date of | ^f Brand | Performance | Check: |
|---------|--------------------|-------------|--------|
|---------|--------------------|-------------|--------|

23-07-2020

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