



BRAND PERFORMANCE CHECK

Mammut Sports Group AG

PUBLICATION DATE: FEBRUARY 2014

this report covers the evaluation period 01-01-2012 to 31-12-2012

ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices.

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

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory 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 factory 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 FWF's work.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via www.fairwear.org. The [Brand Performance Check Guide](#) provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

03-12-2013

Conducted by:

Stefanie Santila Karl

Interviews with:

Josef Lingg (Chief Supply Chain Officer)

Markus Jaeggi (Head of Purchasing)

Mick Farnworth (FWF Contact Person / Purchasing Manager Hardware)

Adrian Huber (Head of Business and Brand Development)

Frank Trommer (Purchasing Manager Apparel)

Harald Schreiber (Public Relations Manager)

Scoring:

Affiliate Benchmarking scores and Performance Benchmarking categories will be published starting in 2014. During 2013, FWF will be testing out the new system and evaluating the appropriate threshold levels for Benchmarking categories.

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data. Future Brand Performance Checks will include improved usability and transparency for audit data.

AFFILIATE INFORMATION	
Headquarters:	Seon
Member since:	25-09-2008
Product types:	Sportswear, Outdoor, Bags&Accessories
Production in countries where FWF is active:	China, Turkey, India, Viet Nam, Romania, Italy, Portugal, Latvia
Production in other countries:	Germany, Denmark, Ireland, Taiwan, Philippines, Latvia, Switzerland
BASIC REQUIREMENTS	
Workplan for this evaluation period was submitted?	Yes
Projected supplier register for this evaluation was submitted?	Yes
Actual supplier register for this evaluation period has been submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	98%

Summary:

Mammut meets most of FWF's management system requirements and goes beyond some of them. 40% of the production is sourced in low risk countries, 60% in high risk, approx. 5.3% is sourced from a FWF member factory in a high-risk country. A first factory from Mammut was enrolled in 2012 in the Workplace Education Programme in China. Mammut has strong internal systems in place. Proof is needed in the coming years on how well these systems can help prevent overtime and ensure living wages at the production sites. Mammut won the FWF Best Practice Award 2012 for its efforts in working together with other brands to ensure good working conditions.

1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries		Countries with relatively low risk of labour violations as defined by FWF.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	60%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier register provided by affiliate.

Comment: Mammut has at least 10% factory production capacity at approx. 60% of its suppliers.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	70%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier register provided by affiliate.
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Comment: The company aims at having long term relations with suppliers. According to its 2012 supplier register, Mammut maintains a business relation for more than 5 years with factories that accounted for 69.5% of its total purchasing volume. Less than 1% of the volume came from suppliers with whom a relationship existed for less than a year.

1.3 Labour conditions are considered when selecting new suppliers	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
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Comment: Performance of suppliers regarding social standards is taken into account in the process of selecting suppliers and placing orders. Possible new suppliers are first checked through desk research and a formal scoring system. Hereafter senior management of Mammut visits a potential supplier before the placing first order. During this visit Mammut's approach to implement FWF membership is discussed.

1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed	N/A	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.
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Comment: All suppliers are requested to sign the Code of Labour Practices (CoLP) and to complete the questionnaire on the FWF labour standards. There has not been a new supplier in 2012.

1.5 Company conducts audits at all new suppliers before placing orders	No	An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.	Audit documentation; must meet FWF audit quality standards.
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Recommendation: It is recommended to conduct an audit at new suppliers before placing production orders to assess risks for CoLP violations. Creating a FWF Wage Ladder to assess the level of wages can be part of the risk assessment. FWF suggests affiliates to select suppliers that are willing to cooperate on improvements.

Comment: Production sites are visited by staff from Mammut and labour conditions at the production site as well as FWF membership is discussed. No formal audit to evaluate social standards is conducted at new suppliers before placing orders.

1.6 Affiliate sources from an FWF factory member	Yes	When possible, FWF encourages affiliates to source from FWF factory members. The small number of factories in the programme means sourcing from FWF factory members cannot be a requirement.	Supplier register provided by affiliate.
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Comment: Mammut sources 5.3% from a FWF member factory.

1.7 Percentage of production volume from factories owned by the affiliate	1%	Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.	Supplier register provided by affiliate.
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Comment: Mammut has an own production site for bags and for ropes.

1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic 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.
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Recommendation: FWF suggests to implement a formal incentive system to reward suppliers for realised improvements of working conditions or a system to grade suppliers regarding performance on working conditions.

Comment: Mammut has a system which ranks suppliers in their performance during the process of signing the CoLP, communicating about audits and follow up on the corrective action plan. This is done in a separate file which is not incorporated in the formal supplier evaluation system. As a result FWF finds that this system does not clarify the weight of the level of working conditions vis-à-vis other criteria such as price, lead time, quality and service. Mammut does not have a formal incentive system to reward suppliers for realised improvements of working conditions or a system to grade suppliers regarding performance on working conditions.

1.9 The affiliate's production planning systems support reasonable working hours	Strong integrated systems in place	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.
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Comment: To ease production pressure on suppliers Mammut shares detailed forecast information with suppliers, which should help them to plan their capacity for production. The company has reserved substantial margin time in its delivery cycles to ensure that reasonable order delay can be handled. Already in 2011 Mammut increased the lead time on apparel orders by three weeks to reduce the need for overtime. When retailers to which Mammut delivers ask for a bigger order of a certain style, the company generally tries to swap order delivery dates for 2 different styles that are made at the same supplier. In 2012 the company invested substantial efforts in detailed discussions with suppliers on capacity planning in order to decrease excessive overtime. These discussions are documented in detail by the company.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	100%	Excessive overtime is one of the most common labour rights violations in high-risk production countries. It is often caused by poor production planning by brands.	Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.
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Comment: Excessive overtime was found in all three factories where FWF teams conducted an audit in 2012. At those factories Mammut is not the only customer which means that the root cause for overtime can be from Mammut but also from other brands sourcing at the factories.

1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime	Preventive approach	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Examples of root cause analyses and resulting changes in production planning/policy.
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Recommendation: FWF recommends Mammut to investigate the root causes of excessive overtime in factories where Mammut orders cover at least 25% of the production capacity. As part of such an analysis all incidents of overtime, their origin and severity should be recorded during a period which is representative for an entire production season. After this analysis, a step-by-step plan could be drafted by the factory to bring the amount of working hours down to legally allowed levels. As an outcome of assessing the root causes of excessive overtime, the plan should specify how and if and to what extent the factory can control overtime hours, and to what extent Mammut could assist. FWF could give references of credible local experts who could facilitate an assessment on working hours in the workplace.

Comment: Mammut is aware of the occurrence of excessive overtime at its suppliers. The company recognizes delays in product development have an influence in possible delays in production and puts a pressure for risk of needed extra overtime. Mammut identified also other factors as fabric delays and overbooking. According to the company production delays happen mostly from quality issues which need rework. A production capacity plan is agreed upon with suppliers at the beginning of the year for the coming year. The production capacity plan indicates order dates and order amounts. The production capacity plan is part of a strategy of Mammut to ensure that the production capacity is given at the production sites for the production of Mammut.

1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries	Policy at a country level	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.
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Recommendation: FWF is presently designing a project with another member on implementation of living wages. This project includes transfer of a budgeted amount of money from the affiliate to workers at a selected supplier as a step to improve worker wages. Mammut is encouraged to follow this or a similar or their own project and to discuss internally if and how it would be interested in a similar approach.

Comment: Mammut reaches an agreement on prices and delivery times with suppliers on the basis of negotiations after target prices are set on the basis of past experience and sales forecasts. If price increases occur the wage component of the prices is analysed. To a certain level Mammut is willing to accept price increases if these would mean that living wages would be paid. During 3 audits by FWF teams in 2012 all suppliers stated that they are generally satisfied with negotiations by Mammut on prices and lead times.

1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages	No failures by suppliers to pay minimum wage were reported during the past year	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.
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Comment: The audits carried out by FWF teams at suppliers in 2012 pointed out that wages were above local minimum standards.

1.14 Evidence of late payments to suppliers by affiliate	No	Late payments to suppliers can have a negative impact on factories 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 factory and affiliate financial documents.
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Comment: None of the three audits in 2012 indicated late payments to suppliers by Mammut.

1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Supply chain approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondence with supplier, other relevant documentation.
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Recommendation: Mammut is encouraged to continue its assessment of performance of key suppliers regarding wage payments. FWF encourages the company to share this information with other members.

Comment: Mammut has put efforts into increasing knowledge about living wages in production countries as well as on stakeholder level in Europe attending conferences on living wage. The company made an independent assessment of the performance of its key suppliers regarding wage payments. The company made use of available wage ladders made by FWF teams. For suppliers where no wage ladder was available, the company developed its own wage ladders based on information on wages that was obtained from suppliers. At one supplier in China it was found that some of the rank and file workers earn wages for regular hours that are on par with or above Asia Floor Wage. In most factories wages were found to be below the amount constituting a living wage as estimated by local stakeholders.

Additional comments on Purchasing Practices:

In 2012 Mammut started working with one additional supplier for backpacks. In 2011-2012 relations with two suppliers (one in India, one in China) were terminated. In both cases willingness to implement FWFs Code of Labour Practices was an important factor in the decision. The factory in India did not agree to guaranteeing minimum wage; the factory in China did not agree to be audited. This development meant that a share of production was moved to Latvia and Turkey.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring		Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership (Threshold is 40% first year, 60% second year of membership and 90% thereafter)	Does meet threshold	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.

Comment: Mammüt has designated staff to coordinate activities to monitor and improve working conditions in factories.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	An in-depth effort has been made to address most or all CAPs	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.
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Comment: The company has a systematic way to manage the process to follow up on corrective action plans.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	95%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.
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Comment: Staff of Mammut visits the suppliers at least once a year. Mammut has local staff in several countries which go visit production on a regular basis.

2.4 Existing audit reports 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.
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Comment: Existing audit reports are collected, the quality assessed and corrective actions implemented.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.
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Comment: Corrective action plans resulting from audits are followed up on by Mammut by requesting the supplier at least once a year to give an update on progress in realizing improvements. In practice the majority of suppliers give updates more often. Mammut collects pictures and documents via email as a way to provide evidence on realized improvements. This process is supported by the quality offices that collect information from suppliers when needed. In practice this happens mostly with regard to issues related to health and safety. Other issues are checked upon by asking suppliers for information. Follow up audits are issued to assess if improvements were realized.

2.6 A structured approach is used to address issues that occur at multiple suppliers	Yes	Issues that occur in multiple factories often need to be addressed in a systemic manner, especially when the root causes are located in brand management choices or from regionally specific issues (e.g. fire safety, gender discrimination and harassment).	Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.
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Comment: During Supplier Day event in Germany in July 2013, all suppliers with factories in Vietnam discussed specifics of implementation of laws regarding hazardous work (6 monthly health checks).

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes 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.
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Comment: In 2012 Mammut proactively approached other customers of its suppliers to arrange shared audits and shared follow-up of corrective action plans. Mammut exchanged detailed information on the follow-up process with other customers, hereby setting a positive example for other companies. Together with another two FWF affiliates Mammut won the FWF Best Practice Award 2012 in April 2012. The award recognizes the advanced activities of all three brands to work together on resolving corrective actions at shared suppliers.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.
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Comment: Monitoring requirements are fulfilled for production in low-risk countries. Mammut could prove that production sites are visited regularly, that the CoLP has been signed and that the CoLP was hung up at the production sites.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	Supplier register; Documentation of sales volumes of products made by FWF or FLA members.

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
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.

Comment: Mammut has a designated person responsible for handling complaints and is sufficiently aware of how FWFs complaints procedure works.

3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.
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Comment: Mammut generally sees to it that the Code of Labour Practices (CoLP) including contact information of the local complaints handler of FWF is posted in factories in a location that is accessible to workers. Suppliers are occasionally asked to send photos as evidence that the document is posted.

3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	66%	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.
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Comment: During three factory audits that were carried out by FWF teams in 2012 it was found that the CoLP was posted in a place that was accessible to workers at all three factories. Only at one out of the three factories the workers were not aware of the FWF worker helpline.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes with root cause analysis and efforts to prevent the problems from recurring	Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.	Documentation that affiliate has completed all required steps in the complaints handling process.
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Comment: In October 2012 FWF received a complaint regarding a supplier of Mammut in Turkey with regard to the standard 'Reasonable Hours of Work'. FWF, Mammut and another FWF affiliate member company have been working together to solve the complaint. Machinery for additional staff was bought end of 2012, this has been verified by FWF in 2013. A report on the complaint is published on the FWF website.

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.
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Comment: The complaint received from a worker in Turkey has been addressed in active cooperation with FWF and another FWF affiliate.

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
4.1 Staff at affiliate is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.

Comment: Staff of Mammut is sufficiently informed about steps taken to implement FWF membership. This is mainly done through internal meetings, the internal quality management system and newsletters.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.
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Comment: Staffs of Mammut who visit suppliers are sufficiently informed to follow up on corrective action plans during factory visits. Relevant staff of Mammut is actively participating in seminars, round tables and working groups.

4.3 Agents are informed of CoLP requirements and act to support their implementation	Yes, and agents actively support implementation of the CoLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.
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Comment: Agents and suppliers of Mammut are sufficiently informed about FWF membership and the implementation of the Code of Labour Practices through the periodic Mammut supplier newsletter wherein FWF membership is a recurrent topic. Mammut actively encourages its suppliers to participate in FWFs supplier seminars.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	13%	Lack of knowledge on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.
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Recommendation: Mammut is recommended to enrol a greater number of its suppliers in FWFs Workplace Education Programme (WEP), which offers trainings factories producing for FWF members. WEP trainings contribute to social dialogue between workers and management. The introductory training of WEP builds awareness of labour standards and strengthens dispute handling mechanisms. It is made available to FWF members free of charge.

Comment: Mammut has engaged one of its long term apparel suppliers in FWFs Workplace Education Program (WEP). WEP offers training activities to strengthen awareness of labour standards and grievance mechanisms among workers and management, and hereby promotes social dialogue on factory level.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.
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Recommendation: In order to further communication between employers and workers in the workplace FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered.

Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

Comment: None of the factories located in other countries than the countries where WEP is offered have participated in trainings for management and workers on CoLP, FWF and grievance mechanisms.

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
5.1 Supplier register for the previous financial year is verified as being complete and accurate	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.

Requirement: Mammut is asked to notify FWF as soon as possible in case unknown subcontractors are discovered.

Comment: Mammut has a functioning workflow and a designated person to keep its supplier register up to date. The company maintains its supplier register on the basis of order administration and the annual questionnaires that are collected from factories and systematically analysed. The supplier register for 2012 meets the requirements of FWF. It lists all factories that manufacture clothing, footwear, harnesses, backpacks, sleeping bags and lamps for Mammut. For each supplier it specifies production location data, FOB value, dates of audits and follow up visits and important other customers of suppliers. FWF found that the supplier register does not include all subcontractors of suppliers. In the weeks preceding the performance check Mammut Sport itself found that one of its suppliers in Vietnam makes use of subcontractors that were previously unknown to the company. These subcontractors will be included in the supplier register for 2013.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	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.
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Comment: Staff is updated on relevant social compliance issues before they travel. Relevant parts of meeting reports of staff of the purchasing department are included in the CAP follow up system. Information on the status of corrective action plan is systematically collected and maintained on the corporate server. This information includes updates from purchasing staff and top management visiting suppliers. Discussions with suppliers on specific improvement points are well documented.

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.

Comment: Mammut informs consumers and other external parties about its approach to improve working conditions through its corporate website, dealer workbooks, product flyers and store meetings. This happens in correct wording and with references to FWFs website for further information.

The company makes use of hangtags to inform consumers about its FWF membership. This happens according to FWFs guidelines. Sales staff has been informed about FWF membership of the company during store meetings.

6.2 Affiliate engages in advanced reporting activities	Yes	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.
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Recommendation: FWF regards the publication of corrective action plans and realized improvements as a best practice. This could be of interest in the future for Mammut.

Comment: Mammut has published the report of the 2011 performance check on its website. The company does not publish corrective action plans resulting from audits on its website.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Yes	The Social Report is an important tool for brands to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.
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Requirement: FWF expects Mammut to specify the main areas for improvements and realised results in the annual social report.

Comment: Mammut released its 2011 social report on its corporate website. This report does not contain an overview of the main results from audits in factories.

Additional comments on Transparency:

Mammut actively responds to questions resulting from public campaigns to raise awareness among consumers. Company staff participates in external events to give insight in its work to implement labour standards. Mammut also engages with independent researchers who study the effectiveness of FWFs work. Doing so, the company contributes to growing awareness of working conditions in factories among consumers and other parties.

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.

Recommendation: FWF regards collecting feedback from factories as input for this annual evaluation as a best practice. The evaluation could for example assess which improvements were and were not successfully implemented in factories, whether the chosen approach has been cost efficient, if the requirements from FWF membership were successfully communicated and whether purchasing practices have been supportive for implementation of the Code of Labour Practices. Also, an evaluation could strengthen support for FWF membership among factories.

Comment: Mammüt evaluates steps taken in context of FWF membership as part of regular internal discussions between members of the Corporate Responsibility and Purchasing departments. Performance on monitoring and improving labour standards in the supply chain is measured and evaluated during quarterly meetings that involve the CSR coordinator and top management. A yearly evaluation of FWF membership is made during the process of writing the work plan and receiving FWFs performance check report. Mammüt collects feedback from factories as part of ongoing discussions, but has no formal way of evaluating implementation of the Code of Labour practices.

7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.
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Additional comments on Evaluation:

Mammut evaluates FWF systems regularly and gives detailed feedback which is appreciated from FWF.

RECOMMENDATIONS TO FWF

1. Mammut sees FWF membership as a strategic partnership and a credible approach to stay on top of social standards.
2. Mammut would welcome FWF to develop clear guidelines on what evidence would be sufficient to close non-compliance issues in the CAP follow up process.
3. Mammut encourages FWF to make more use of webinar meetings.
4. FWFs online wage ladder module should be made more user-friendly.
5. Mammut is interested in studies that compare retail prices, take home wages for workers and inflation levels in key production countries. This would help understand how prices of products moved vis-à-vis real wages.