



BRAND PERFORMANCE CHECK

Mammut Sports Group AG

PUBLICATION DATE: JULY 2015

this report covers the evaluation period 01-01-2014 to 31-12-2014

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of 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. They evaluate the parts of affiliate 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 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.

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 affiliate 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

Mammut Sports Group AG

Evaluation Period: 01-01-2014 to 31-12-2014

AFFILIATE INFORMATION	
Headquarters:	Seon, Switzerland
Member since:	25-09-2008
Product types:	Sportswear, Outdoor, Bags & Accessories
Production in countries where FWF is active:	China, India, Romania, Turkey, Viet Nam
Production in other countries:	Denmark, Germany, Ireland, Italy, Latvia, Philippines, Portugal
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
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	99%
Benchmarking score	75
Category	Leader

Summary:

Mammut meets most of FWF's management system requirements and goes beyond several. With 99%, Mammut's monitoring percentage meets the required 90% monitoring threshold.

Mammut maintains stable supplier relationships and has a leverage of more than 10% at two-thirds of its suppliers. Furthermore, Mammut employs a strong production planning system to support reasonable working hours at its suppliers. However, excessive overtime was still found at both FWF audits conducted in 2014. FWF therefore recommends Mammut to further analyse root causes of excessive overtime in cooperation with suppliers.

While Mammut generally conducts a thorough due diligence process before selecting new suppliers, they did not know the details of the suppliers of their Japanese distributor. Mammut has taken steps to remediate this situation.

Regarding the topic of living wages, Mammut has made considerable efforts to gather information about its supply chain and possible solutions. FWF recommends Mammut to develop an action plan with key suppliers to move towards higher wage benchmarks.

Furthermore, FWF encourages Mammut to further enroll suppliers in the Workplace Education Programme to enhance awareness of worker rights and stimulate dialogue between workers and factory management.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates 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 FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—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 affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates 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. Affiliates 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: Affiliates 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. Affiliates 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
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	67%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	3	4	0

Comment: Mammut buys between 10-15 % of production capacity at several suppliers. In some cases the leverage of Mammut even reaches 45-60 %. This allows Mammut to effectively work on improvements of working conditions.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	85%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	4	4	0
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Comment: Mammut maintains relationships lasting longer than five years with most of its suppliers.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	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.	2	2	0
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Comment: Mammut in general has a strong system in place to ensure new suppliers sign the FWF Code of Labour Practices before first orders are placed.

Mammut did not add new suppliers in 2014, but learnt about one supplier used for Mammut production that they were not aware of.

In 2012, Mammut made their Japanese distributor a 100 % subsidiary of Mammut. The subsidiary was allowed to place orders for certain products directly, yet did not share all supplier details with Mammut Headquarters in 2014. When FWF conducted an audit for another affiliate at the factory in 2014, they also found Mammut production.

Mammut held a meeting in February 2015 with its subsidiary to train them about FWF and set up a system to ensure that no orders can be placed without the knowledge of Mammut Headquarters.

While the supplier was not new to the subsidiary, it is counted in this performance check as a new supplier.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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Comment: In the process of selecting new suppliers, Mammut takes performance of suppliers regarding social standards into account. Possible new suppliers are first checked through desk research and a formal scoring system. Thereafter senior management of Mammut visits a potential supplier before placing the first order. During this visit Mammut's approach to implement FWF membership is discussed. In addition, Mammut informs FWF very early about possible new suppliers in high-risk countries to include FWF country specific requirements.

This process was not followed for the supplier added by Mammut Japan (see indicator 1.3).

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and performance improvement is rewarded	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.	2	2	0
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Comment: Mammut implemented a formal supplier rating system in 2013. Supplier performance is now reviewed every year with social compliance being part of the ranking.

Mammut rarely adds new suppliers and rather increases the business with existing, well-performing factories.

Bad performance with regard to social compliance but also other factors lead to reduction of business.

Mammut sees a link between good social compliance and general good performance and management capacity of the supplier.

1.6 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.	4	4	0
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Comment: A production capacity plan is agreed upon with suppliers at the beginning of the year for the coming year indicating order dates and order amounts.

To ease production pressure on suppliers Mammut shares detailed forecast information with suppliers, which should help them to plan their capacity for production. Sales forecasts are given already 9-10 months in advance and are updated monthly. The company has reserved substantial margin time in its delivery cycles to ensure that reasonable order delay can be handled.

When retailers (to which Mammut delivers) ask last minute for a bigger order of a certain style, the company generally tries to swap order delivery dates of other styles that are made at the same supplier.

Mammut tries to split the orders equally giving different delivery dates for all orders at each production site.

All suppliers need to agree on the order dates. In case they see difficulties in producing the amount in a certain period, Mammut sees possibilities to change the orders e.g. shifting a higher amount of production to a time when less production is taking place at the production site.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	3	6	0
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Recommendation: It is recommended that Mammut further investigates the impact of own production planning systems on working hours at suppliers. With key supplier, the company could pilot ways to reduce overtime.

Comment: Despite Mammut's strong production planning systems, both FWF audit conducted in 2014 as well as one complaint showed excessive overtime still occurred at Mammut's suppliers.

The company recognizes delays in product development have an influence in possible delays in production, but also identified other factors such as fabric delays and overbooking as possible causes for excessive overtime.

Overtime has been discussed on management level at production sites to improve for the future.

In one case, a supplier realised that Mammut and another FWF affiliate shared similar peak seasons. After discussions, the supplier planned to open a new production site in 2015 and split orders from Mammut and the other FWF member to allow even production capacity.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	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.	2	4	0
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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.

Mammut has a detailed understanding how the pricing of most of their products is composed. Wage ladders from previous audits are taken into consideration, when negotiating prices. If a supplier quotes a comparatively low price, Mammut asks them to reconsider to ensure good quality and payment above minimum wage.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	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.	2	2	-2
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Comment: FWF audits conducted in 2014 did not show evidence of payment below legal minimum wage.

1.10 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.	0	0	-1
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Comment: FWF audits conducted in 2014 did not show late payments to the suppliers.

1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0
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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. The next steps would be to start develop an action plan to implement higher wage levels. After conducting a root-cause analysis of wages being lower than living wage estimates, Mammut could e.g. support suppliers reducing costs to create capacity to increase wages. Another possible first step could be to enhance communication between workers and factory management.

Comment: During the last years and also during 2014, Mammut has made considerable efforts to increase their knowledge about living wages in production countries as well as on stakeholder level in Europe attending various conferences and roundtables on living wage. The company made an independent assessment of the performance of its key suppliers regarding wage payments in 2013. Also, Mammut makes use of available wage ladders made by FWF teams. However, Mammut has not yet developed a systematic approach to increase wage benchmarks at their suppliers.

1.12 Affiliate sources from an FWF factory member.	Yes	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	1	1	0
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Comment: Mammut sources 10% of its overall production from a FWF member factory.

1.13 Percentage of production volume from factories owned by the affiliate.	1%	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 affiliate's score.	Supplier information provided by affiliate.	1	2	0
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Comment: Mammut has an own production site for avalanche backpacks and for ropes.

PURCHASING PRACTICES

Possible Points: 43

Earned Points: 32

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	78%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	20%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Total of own production under monitoring	99%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

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 FWF 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: Mammut has designated staff to coordinate activities to monitor and improve working conditions in factories. Follow up of corrective actions is supported by local staff in China.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Intermediate	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.	4	8	-2
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Recommendation: FWF recommends Mammut to actively support its suppliers with remediation, especially concerning structural issues like excessive overtime or low wage levels.

To facilitate this process, Mammut could consider:

- Hire a local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars.
- Provide factory training.
- Share knowledge/material.
- Provide financial support to the supplier for implementing improvements.

Furthermore, FWF recommends Mammut to ensure that issues relevant for several suppliers are remediated systematically including taking preventive steps.

Comment: Generally, corrective action plans resulting from audits are followed up 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 officers and Mammut's travelling staff 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. All findings are monitored via a colour-coded "cockpit" document.

In 2014, FWF conducted two audits at suppliers of Mammut, one in Vietnam and one in China. In China, some findings from a previous audit in 2011 had been remediated, but the audit still showed serious issues concerning excessive overtime and correct payment of overtime premium as well as sick leave. Mammut could show that they were working to improve some of the findings together with the supplier (e.g. looking for extra capacity to avoid overtime), but challenges remain.

The other audit also highlighted (among other things) excessive overtime. Mammut was not aware of the progress regarding remediation as the audit was commissioned by another FWF affiliate sourcing at the same supplier.

Mammut could show that they had been working on follow-up of corrective actions from audits conducted in 2013.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	93%	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.	4	4	0
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Comment: Staff of Mammut visits the suppliers at least once a year. Mammut has local staff in several countries which visit production sites on a regular basis.

2.4 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	0
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Comment: One of Mammut's suppliers received a SA8000 certificate. Mammut collected the audit report, assessed the quality of the audit and was able to show that they had followed up on corrective actions.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF 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.	2	2	-1
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2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Intermediate Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0
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Recommendation: FWF recommends Mammut to also address structural risks like lack of freedom of association or excessive overtime more proactively within its monitoring system.

Comment: Mammut has set up an elaborate management system to identify possible risks. The FWF affiliate uses FWF research and guidance documents, actively monitors publications of other credible sources and attends roundtable discussions and workshops.

High risk issues for Mammut might include:

A) Employment of Syrian refugees at Turkish supplier. Mammut is aware of the issue and has discussed it with its supplier in Turkey. The factory is visited regularly.

B) Health risks of downfilling. Mammut realizes that the process of filling sleeping bags etc. with downs poses possible health risks to workers. They therefore only accept suppliers with proper filling chambers and machines. However, one audit in 2014 found that not all workspaces at the supplier were adequate.

C) Chinese migrants in Italy. Mammut is aware that some Italian supplier might employ Chinese migrants. This is not the case for Mammut's supplier.

D) Sourcing in new regions. Mammut started extensive investigations regarding sourcing in new production countries such as Bangladesh. Approximately two years before planned market entry in 2015, the company has evaluated sourcing at suppliers in new countries/regions. The FWF country study was taken into account. Also possible reactions from customers to production in such new countries/regions are evaluated. FWF has been informed from the beginning.

However, Mammut does not actively address freedom of association with its monitoring system as it considers Mammut's leverage regarding the topic too small.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0
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Comment: Mammuto will start sourcing in Bangladesh in 2015.

2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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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.	2	2	-1
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Comment: Mammuto generally proactively approaches other customers of its suppliers to arrange shared audits and shared follow-up of corrective action plans.

In the case of the audit conducted 2014 at its Chinese supplier, Mammuto actively collaborated with another FWF affiliate to remediate overtime. In the case of the audit at its Vietnamese supplier also conducted in 2014, another FWF affiliate took the lead in follow-up of corrective actions. Mammuto was not aware of the status.

Mammuto also continuously shares progress with CAP follow up regarding audits before 2014 with other FWF affiliates.

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.	2	2	0
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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 posted 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.	N/A	3	0
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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.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0
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MONITORING AND REMEDIATION

Possible Points: 29

Earned Points: 22

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	3	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	3	

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 FWF 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: 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.	2	2	0
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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 FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	75%	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. Factory participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme.	4	4	-2
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Comment: In one out of the two FWF trainings conducted in 2014, workers were not aware of the FWF helpline. Two Mammut suppliers participated in a WEP training about worker's rights and grievance mechanisms, which is also counted towards this indicator.

3.4 All complaints received from factory 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. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	3	6	-2
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Recommendation: FWF recommends Mammut to take advanced steps to uncover root causes of reported problems and prevent them from recurring. Mammut could also analyse whether those issues might occur at other factories and systematically address them within their monitoring system.

Comment: Mammut received three complaints in 2014.

One complaint received in March 2014 raised by several workers mainly concerned wage deductions and incorrect payment of overtime premium. Mammut, together with two other FWF affiliates sourcing at the supplier, followed up according to FWF complaints procedure. An audit in January 2015 showed that factory management acts according to Chinese law regarding payments, but workers were often not aware of the exact calculations. A WEP training was held in the same month to enhance dialogue between workers and factory management.

The second complaint also concerned a Chinese supplier. Three different workers in April, June and August 2014 raised the same complaint of factory management refusing to accept their resignation. All complaints were resolved soon after. Mammut has discussed the issue with top management of the supplier. Until now, no further complaints regarding this supplier have been received by FWF.

The third complaint was received in June 2014 and concerned excessive overtime. The supplier indicated that he had difficulties planning production in peak season without excessive overtime. Mammut could show during the performance check that they and the other FWF affiliates had taken first steps to remediate this issue. The supplier was planning to use a second production site to split peak orders of Mammut and other FWF affiliates in the same time period between the two factories and therefore avoid excessive overtime.

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.	2	2	-2
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Comment: Two of the complaints received in 2014 concerned suppliers shared with other FWF affiliates. Mammut cooperated closely with them to resolve the complaints.

COMPLAINTS HANDLING

Possible Points: 15

Earned Points: 12

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff 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.	1	1	-1

Comment: Staff of Mammut are sufficiently informed about steps taken to implement FWF membership. This is mainly done through internal quarterly meetings, the internal quality management system as well as the employee journal. Furthermore, sales staff is briefed regularly on topics concerning FWF.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	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.	2	2	0
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Comment: Staff of Mammut who visit suppliers are sufficiently informed to follow up on corrective action plans during factory visits and actively follow up with the main FWF contact on social compliance at the production sites. In addition, relevant staff of Mammut is actively participating in seminars, round tables and working groups and all staff in direct contact with suppliers has observed a FWF audit.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support 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.	2	2	-2
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Comment: Mammut currently works with one agent, who is informed about FWF and actively supports Mammut in remediating corrective action plans.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	37%	Lack of knowledge and skills 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.	4	6	0
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Recommendation: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. This programme is offered in the 4 priority countries as well as Vietnam, Tunisia and Romania. Mammut should motivate its main suppliers to join WEP trainings.

Comment: In 2014, two Chinese suppliers sourcing for Mammut participated in a WEP training.

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 or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	0	4	0
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Recommendation: All factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace FWF recommends Mammut to ensure suppliers participate in trainings. 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.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 9

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require affiliates to first know all of their production locations.	Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities.	3	6	-2

Recommendation: FWF recommends Mammut to ensure that all production locations, including those producing for Mammut Japan, are covered by Mammut's monitoring system and included in the FWF database.

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. Every 18 months, all suppliers have to fill in the FWF questionnaire to ensure all information on all suppliers is up-to-date. However, in 2014 Mammut was not aware of production locations used by its subsidiary in Japan until a FWF audit by another affiliate was conducted.

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.	1	1	-1
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Comment: Staff is updated on relevant social compliance issues regularly and especially again before they travel. Relevant parts of meeting reports of staff of the purchasing department are included in the CAP follow up system.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
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.	1	1	-2

Comment: Mammut communicates about FWF on its website and in stores and, as a FWF leader, uses the FWF logo on hangtags. All communication adheres to the FWF communication policy.

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.	1	1	0
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Comment: Mammut publishes the FWF Brand Performance Check report on its website.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Published on affiliate's website	The Social Report is an important tool for affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	2	2	-2
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Requirement: CHECK - Could not find it on website??

Comment: Mammut submitted the social report 2014 to FWF and published it on its website. The report includes FWF identification numbers of all suppliers, so other FWF affiliates can check whether they share a supplier with Mammut.

TRANSPARENCY

Possible Points: 4

Earned Points: 4

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 FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Mammüt evaluates steps taken in context of FWF membership as part of regular internal discussions. 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.

7.2 Changes from previous Brand Performance Check implemented by affiliate	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2
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Comment: Mammüt was required to specify the main areas for improvements and realized results in the annual social report. This requirement was implemented.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

Mammut would appreciate more guidance from FWF regarding remediation and risk assessment.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	32	43
Monitoring and Remediation	22	29
Complaints Handling	12	15
Training and Capacity Building	9	15
Information Management	4	7
Transparency	4	4
Evaluation	6	6
Totals:	89	119

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

75

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

02-07-2015

Conducted by:

Lisa Suess and Margreet Vrieling

Interviews with:

Mick Farnworth (FWF Contact Person / Purchasing Manager Hardware)

Peter Hollenstein (Corporate Social Responsibility Manager)

Markus Jaeggi (Head of Purchasing)

Frank Trommer (Purchasing Manager Apparel)

Andy Allemann (Purchasing Manager Footwear)

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.