



BRAND PERFORMANCE CHECK

Manroof GmbH

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

Manroof GmbH

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

AFFILIATE INFORMATION	
Headquarters:	Zürich, Switzerland
Member since:	26-11-2008
Product types:	Promotional
Production in countries where FWF is active:	China, Turkey
Production in other countries:	Austria, Germany, Italy, Netherlands, Pakistan, Portugal, Slovenia, Spain, Switzerland, Taiwan
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	58%
Benchmarking score	54
Category	Needs Improvement

Summary:

Manroof met most FWF's management system requirements to improve working conditions. Manroof monitored 58% of its total purchasing volume, which is below the 90% required of brands in 3+ years of membership. This places Manroof automatically in 'Needs Improvement'.

Manroof maintained stable relationship with over half of its suppliers. Manroof offered direct financial support to its main suppliers and used a local consultant to follow up on corrective action plans.

As a promotional products company, Manroof found it a challenge to receive written commitments on FWF's code from its external suppliers and its own suppliers located in low risk countries. Manroof buys relatively small amounts from a large number of suppliers, at each one Manroof has low leverage. Manroof did not conduct any visit in 2014 to its suppliers in low risk countries. Based on the above, Manroof did not meet the monitoring requirements for low risk countries, representing some 8% of its total FOB purchases.

FWF encourages Manroof to audit more of its suppliers in 2015 and bring its monitoring percentage above the 90% required from brands of 3+ years of membership. As a result, and combined with a sufficiently high benchmark score, Manroof is expected to regain 'Good' status. In addition, Manroof is expected to continue its efforts in China to involve more factories to join the Workplace Education Programme. In addition, Manroof is expected to ensure that factories in both high and low risk countries return the Fair Wear questionnaire and post the Code of Labour Practices.

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	63%	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

Recommendation: FWF recommends Manroof to consolidate its supplier base where possible, and increase leverage at main supplier(s) to effectively request improvements of working conditions.

Comment: As a promotional product company, Manroof's volume depended on the order of its customers. Manroof needs to maintain a certain level of diversity in its production to attract and maintain customers. It therefore has a relatively large number of suppliers, which enjoy small orders from Manroof.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	72%	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.	3	4	0
--	-----	--	---	---	---	---

Recommendation: FWF recommends Manroof to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No	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.	0	2	0
--	----	---	---------------------------	---	---	---

Requirement: Manroof needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

Comment: Manroof informed all suppliers about its FWF membership and requested the suppliers to sign the Code of Labour Practices. However, some suppliers in China and most suppliers in the low risk country did not return the signed copy. Manroof believes its low leverage and small order sizes limit its ability to be too demanding on this with its suppliers.

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
---	-----	---	---	---	---	---

Comment: Manroof's CEO is involved in and makes decisions when choosing a new supplier. Working conditions are considered as well as quality, delivery time and price. Before placing orders it requests existing audit reports. Audit reports are reviewed and shared with a Hong-Kong based CSR consultant, working part-time for Manroof, who follows up on correction action plans. When serious non-compliance issues are indicated, Manroof will always request for information on progress of remediation work from the supplier.

As Manroof has many small suppliers, it is not possible to conduct FWF audits before starting a new business relation. If the cooperation intensifies, Manroof will request a FWF audit.

1.5 Supplier 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
--	-----	--	---	---	---	---

Recommendation: Manroof is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

FWF encourages avoiding terminating business relationships with factories which have made progress in the implementation of corrective action plans.

Comment: As Manroof is dependent on orders from its customers, which fluctuate from year to year, it was not possible for Manroof to reward a factory for its performance in terms of increasing orders. Manroof tried to support all its main suppliers to implement FWF's Code of Labour Practices, while prioritizing its larger long-term suppliers. In some case Manroof provided financial support to some of its suppliers to implement corrective actions following from FWF audits.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
---	---------------------------	---	---	---	---	---

Comment: All of Manroof's products are made-to-order. After defining all specifications, a sample will be manufactured. The standard production leadtime is around 4 weeks after approval of the sample. As order sizes are small, Manroof considers that production lead times suffice. Manroof discussed delivery times with customers and the suppliers together before confirming an order. When urgent orders were placed, Manroof would buy from external suppliers, who already has stock for the products.

Customers of Manroof could not inform earlier on when and how much products were needed. Maximum 10-20% of the customers orders could be planned in advance. While Manroof considers that production lead times suffice, it does not know well whether the factories operate excessive overtime. The only source of information in this regard is the FWF audit reports.

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
--	----------------------	--	---	---	---	---

Recommendation: A production planning system can have a significant impact on the levels of excessive overtime at factories. Whenever possible, Manroof 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.

Comment: Manroof faces challenges to address excessive overtime, as its leverage at suppliers is small. In addition, it is difficult to make long-term advance planning, as Manroof responds to orders if and when they come in. Some of orders are recurrent, but many are new. Manroof gives its suppliers four weeks for production, which normally more than suffices, as order quantities are small. When suppliers cannot meet the delivery deadline, Manroof tends to be flexible and will not apply penalties. Transporting goods by airfreight is considered in exceptional cases.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	No policy in place	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.	0	4	0
--	--------------------	--	--	---	---	---

Recommendation: At a minimum, Manroof is recommended to investigate wages levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: Manroof had stable suppliers for specific products. Based on trust, Manroof often agreed with the prices proposed by the suppliers. Based on the wage ladders included in FWF audit reports, Manroof has started to investigate and discuss wage levels with its suppliers.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	Yes	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.	1	2	-2
---	-----	--	---	---	---	----

Comment: At one supplier in China payment below minimum wages was observed for 'retired' packing/inspection workers. Manroof followed up and the supplier subsequently raised the wage levels wages for all workers.

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
---	----	--	--	---	---	----

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
---	------------------------	---	--	---	---	---

Recommendation: FWF appreciates Manroof's initiative towards paying living wages. FWF encourages Manroof to discuss with more suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

FWF advises companies to avoid the concept of a one-time charitable contribution, and strongly recommends affiliates commit to a long term process that leads to sustainable implementation of living wages.

Comment: Based on the FWF audit reports, Manroof is investigating for some suppliers what would be required to bridge the gap between the current wages paid and living wages of all workers at two suppliers in China.

1.12 Affiliate sources from an FWF factory member.	No	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.	N/A	1	0
--	----	---	---	-----	---	---

1.13 Percentage of production volume from factories owned by the affiliate.	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 affiliate's score.	Supplier information provided by affiliate.	N/A	2	0
---	------	---	---	-----	---	---

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 21

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	58%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	0%	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	58%	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: The CEO of Manroof is responsible to following up on monitoring working conditions.

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
---	--------------	---	---	---	---	----

Recommendation: FWF suggests organising a WEP as the next step in remediating the complex, long term issues. The findings and replies of management should be documented and discussed point by point. An additional necessary step is to verify the evidence and the improvements.

Comment: In this reporting period, two factories located in China were audited. Manroof prepared the CAP Excel file and a local consultant hired by Manroof followed up on with the suppliers concerned. Manroof tries to address corrective actions with its suppliers before placing orders in order to have more influence. One of the suppliers provided proof of remediation work, including documents and photos. As an incentive, Manroof offered financial support to implement the corrective action plans.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	14%	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.	1	4	0
---	-----	---	---	---	---	---

Recommendation: Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries). Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: Manroof did not visit any of the suppliers in 2014. However, Manroof's Hong-Kong based CSR consultant visited some of Manroof's Chinese suppliers in 2014.

2.4 Existing audit reports from other sources are collected.	Yes	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	1	3	0
--	-----	---	--	---	---	---

Recommendation: Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

Comment: Manroof collected some third party audit reports before placing orders at new suppliers.

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
--	-----	---	--	---	---	----

Comment: Manroof shared the CAP with factories upon receiving the audit report. Manroof engaged the services of a Hong-Kong based CSR consultant who is following up on the CAPs of audited factories. Manroof plans to visit all the main suppliers end of 2015 and use this opportunity to discuss all the open corrective actions.

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
--	-----------------------	---	--	---	---	---

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Affiliates can agree on additional commitments that are required to mitigate risks. The affiliate can provide additional measures for support and integrate that in the monitoring system.

Comment: In China, Manroof had worked with a consultant and provided financial supports to some of its main suppliers in China on occupational health and safety improvements.

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
--	----------------------------	--	---	-----	---	---

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
---	-------------------------	---	--	-----	---	---

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
---	--------------------	---	--	---	---	----

Recommendation: Cooperation among customers increases leverage, the chances of successful outcomes and long term improvements. A first step can be identifying other clients and their commitment to improving working conditions.

Comment: Manroof shared information with other FWF affiliates on some of their respective suppliers. It has also worked together with several FWF members to address labour conditions at a supplier in India.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No	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.	0	2	0
--	----	---	---	---	---	---

Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Be visited annually by affiliate representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

Comment: In 2014, Manroof did not visit any of the suppliers in low risk countries in Europe. According to Manroof, it was not feasible to visit the production sites, as order sizes were small and spread out over many (8) different European countries. In addition, Manroof did not request most European suppliers to return a signed copy of the FWF Code of Labour Practices, nor did it request to have the FWF Worker Information Sheet posted in factories concerned.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	27%	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.	0	3	0
--	-----	--	-----------------------------	---	---	---

Requirement: FWF affiliate should receive a completed and returned questionnaire from external brands resold by the affiliate.

Comment: In 2014 Manroof asked a few of its external brands to return the external brand questionnaire. However, it was a difficult for Manroof to insist with external brands to return the signed questionnaires, as Manroof only purchased a small amount from each external supplier. Manroof therefore favours to source from external brands that are member of Fair Wear Foundation.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	9%	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.	0	3	0
---	----	---	---	---	---	---

Comment: 9% of Manroof's external production in 2014 came from a FWF member company.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 15

3. COMPLAINTS HANDLING

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of 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
3.2 System exists to check that the Worker Information Sheet is posted in factories	No	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.	0	2	0

Requirement: Manroof must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers.

Recommendation: It is suggested to ask suppliers to submit a photo of the posted Worker Information Sheet with the annual questionnaire and to ask staff visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

Comment: In China and India, Manroof checked whether the Worker Information Sheet was posted in factories concerned through audits and factory visits. Such a system in low risk countries was not yet established.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	50%	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.	3	4	-2
--	-----	--	--	---	---	----

Comment: The workers at two suppliers of Manroof in China were informed in 2014 about FWF through the Workplace Education Programme.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	N/A	6	-2
--	------------------------	---	---	-----	---	----

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	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.	N/A	2	-2
--	--	--	--	-----	---	----

COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 4

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

Recommendation: It is advised to develop a standard procedure for all new employees to get familiar with FWF membership. FWF has material available that can be used to inform (sales) staff.

Comment: The CEO of Manroof actively participated in FWF webinars and stakeholders meeting in Switzerland. Following these events, he disseminated relevant information among Manroof staff.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	No	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.	0	2	0
--	----	--	---	---	---	---

Comment: The CEO of Manroof makes all the decisions regarding sourcing. He also follows up on CSR issues at the suppliers, together with a CSR consultant in China hired by Manroof. Other production staff were aware of FWF, but no advanced training was received.

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
--	-----------------------------	---	---	---	---	----

Comment: Manroof uses one agent based in Hong Kong, which is responsible for sourcing at two suppliers. The agent is informed that Manroof is a member of FWF and knows about FWF requirements and audits. Manroof's CSR consultant follows up on CAPs at these suppliers in close consultation with the agent.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	65%	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.	6	6	0
---	-----	--	--	---	---	---

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. Manroof should motivate more of its main supplier(s) to join WEP trainings.

Comment: In 2014 Manroof enrolled 2 of its suppliers in China in the Workplace Education Programme.

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
---	----	--	---	---	---	---

Comment: Almost all of Manroof's production is either in low-risk countries or China, where WEP is offered. Manroof has one supplier in Pakistan, representing 3% of Manroof's total 2014 FOB purchases. No training was organized at this supplier.

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: The supplier register of the previous financial year has to be complete and accurate; production locations of all suppliers must be listed, including subcontractors. Manroof is advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

Comment: Manroof normally asks the suppliers to have their subcontractors return the signed questionnaires and post the FWF CoLP. Manroof, however, never asked for proof such as pictures of the CoLP posted at the subcontractors. It is difficult for Manroof to verify whether subcontractors are used, other than through FWF audits and through (occasional) visits of Manroof's CSR consultant. However, since Manroof did not visit the factories in Europe, it is not able to ensure no subcontractors were used in those factories.

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
--	-----	--	---	---	---	----

Comment: CEO of Manroof directly communicates with factories on CSR issues. He also leads the production department. Corrective actions are summarized and shared with all staff. Audits reports are shared with the responsible product managers and stored on a shared drive accessible for all staff.

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: Manroof communicates about FWF through on-garment labels, the company website, social report and the company catalogue. Membership is described in correct wording. However, on-garment communication, such as labels and hangtags, is reserved only for affiliates that have reached Leader status, and should be ceased.

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
--	-----	---	---	---	---	---

Comment: Manroof published the social report and performance check report by FWF 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
---	----------------------------------	---	---	---	---	----

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: Manroof is pleased to be a member of Fair Wear as it is in line with the company's identity and values. However, it is concerned about the financial implications, as some of Manroof's suppliers expect Manroof to contribute financially to remediation work called for by Fair Wear audits. Manroof is evaluating FWF membership and weighing the pro's and con's of FWF membership vis-a-vis other initiatives such as BSCI and SA8000.

7.2 Changes from previous Brand Performance Check implemented by affiliate	25%	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.	2	4	-2
--	-----	---	--	---	---	----

Comment: At the brand performance check over the 2013 financial year, the following requirements were included:

- 1) Manroof needs to develop a pricing policy where it knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries.
- 2) Manroof is expected next year to make sure the Code of Labour Practices is posted in its suppliers in Italy, Slovenia, Portugal and Spain.
- 3) Manroof is expected to visit at least the most important supplier located in Germany.
- 4) FWF affiliate should receive a completed and returned questionnaire from external brands resold by the affiliate.

In 2014 Manroof used the wages ladders included in FWF audit reports to understand and discuss wage levels and explored possibility to pay living wages at some of its suppliers in China. No progress was made with posting the CoLP at its suppliers in low-risk countries, paying annual visits to suppliers in low risking and receiving the FWF questionnaire from external brands.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

N/A

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	21	40
Monitoring and Remediation	15	35
Complaints Handling	4	7
Training and Capacity Building	9	15
Information Management	4	7
Transparency	4	4
Evaluation	4	6
Totals:	61	114

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

54

PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

26-05-2015

Conducted by:

Koen Oosterom

Interviews with:

Jacques von Mandach, CEO

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.