



BRAND PERFORMANCE CHECK

Manroof GmbH

PUBLICATION DATE: MAY 2016

this report covers the evaluation period 01-01-2015 to 31-12-2015

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: 01-01-2015 to 31-12-2015

AFFILIATE INFORMATION	
Headquarters:	Zürich, Switzerland
Member since:	26-11-2008
Product types:	Promotional
Production in countries where FWF is active:	China, India, Turkey
Production in other countries:	Austria, Czech Republic, Germany, Italy, Portugal, Slovenia, Spain, Switzerland
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	96%
Benchmarking score	62
Category	Good

Summary:

Manroof met most FWF's management system requirements to improve working conditions. Thanks (in part) to four FWF audits at Manroof suppliers in 2015, Manroof monitored 96% of its total purchasing volume, which is above the 90% required of brands in 3+ years of membership. Combined with a benchmarking score of 62, this places Manroof in the 'Good' category.

Manroof has further consolidated its supplier base and has increased its leverage with its four main suppliers in China. A total of 79 percent of Manroof's purchasing volume originates from suppliers where Manroof accounts for more than 10% of the suppliers' production capacity. This gives Manroof a good position to demand improvements in working conditions. Monitoring and remediation of corrective actions at the Chinese suppliers are supported by a local consultant Manroof hired.

Persuant to the brand performance check over 2014, Manroof conducted a large number of visits in 2015 to its main suppliers in China, as well as suppliers in low risk countries. This has resulted in COLPs being posted and questionnaires completed; issues that needed improvement before.

Manroof should improve its due diligence when starting new business relations. Orders were placed with two suppliers in High Risk country Turkey without properly assessing the working conditions. Production locations were not visited, existing third-party audit reports were not requested and FWF questionnaires were not completed prior to order placement. This exposes Manroof to considerable risks of labour right violations at suppliers concerned.

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	79%	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.	4	4	0

Comment: Manroof consolidated its supplier base in 2015. In 2015, 79 percent of its purchasing volume comes from four suppliers in China where Manroof is responsible for more than 10 % of the respective suppliers' production capacity. In 2014, this percentage stood at 64%.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	87%	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: In 2015 Manroof sourced 87 percent of its purchasing volume from suppliers with which it had a business relation of more than five years. This went up from 72 percent in 2014.

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

Comment: Two suppliers in Turkey did not return signed questionnaires before the first orders were placed.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	No	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.	0	4	0
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Requirement: A formal process should exist to evaluate the risks of labour violations in the production areas Manroof is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

Comment: Generally, before placing orders Manroof requests existing audit reports. Audit reports are reviewed and shared with a Hong-Kong based CSR consultant, working parttime for Manroof, who follows up on correction action plans. When serious non-compliance issues are indicated, Manroof requests for information on progress of remediation work from the supplier.

However, Manroof selected two new suppliers in Turkey, accounting for 2.4 percent of Manroof's 2015 purchasing volume, via internet. First orders were placed without requesting existing audit reports or visiting the suppliers.

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
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Comment: Manroof has no formal evaluation tool, as it has only four main suppliers and therefore is of the view that a formal tool is not required. It uses the FWF audits to assess supplier compliance with the Code of Labour Practices. In the past Manroof has decided to discontinue a business relation due to lack of progress on improvement of working conditions.

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
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Recommendation: A good production planning system needs to be established based on the production capacity of the factory for regular working hours.

Comment: Excessive overtime does occur at Manroof's Chinese suppliers. According to Manroof, this is often caused by late delivery of fabric. Manroof tries to place orders on time and has shown to be flexible when suppliers indicated they needed more time to complete a certain order. At times this meant Manroof had to accept partial delivery and it had to explain to its customers that (a portion of the) goods would be delivered late. Manroof will not apply penalties. Transporting goods by airfreight is considered in exceptional cases. However, for some promotional items (e.g. t-shirts or caps meant for an event or festival) it is impossible to delay delivery by much. Situations as these may result in overtime at Manroof suppliers.

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 occasionally would buy from external suppliers, who already has stock for the products.

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: 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 is asking its suppliers for Excel sheets with the working times. A local consultant hired by Manroof is following up and monitoring working times. This is leading to a better understanding on Manroof's responsibility in easing pressure on suppliers to do excessive overtime. Manroof realizes that excessive overtime is not good for the workers and may also result in a larger number of productions faults.

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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Recommendation: Manroof can start with suppliers with which it has a long business relationship with, and work with these to gain more 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. It has shown a commitment towards payment of living wages and a willingness to contribute financially to this.

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
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Comment: At one supplier in China a FWF audit indicated payment below legal minimum wages for temporary workers. The supplier denied the audit finding. Manroof followed up with the assistance of a local consultant hired by Manroof.

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 encourages Manroof to discuss with its suppliers the possibilities to work towards higher benchmarks, especially at suppliers where Manroof enjoys a long term business relation and has high leverage. 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 suppliers in China. It is also considering to engage the services of a consultant to develop a Living Wage project at a selected supplier.

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
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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
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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)	85%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	10%	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	96%	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
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Comment: In this reporting period, four factories located in China were audited. 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. Suppliers provided proof of remediation work, including documents and photos.

Manroof also provides financial support to one of its suppliers 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	92%	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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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 visited its suppliers in China in 2015. More regular visits are also conducted by the China-based consultant hired by Manroof.

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
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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 occasionally collected third party audit reports before placing orders at new suppliers. However, this is not followed as a rule, as for new suppliers in Turkey this was not done. Manroof has become a member of BSCI and is able to access BSCI reports for some of its 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
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Comment: Upon receipt of the audit report, Manroof prepares a letter which calls upon the supplier to remediate immediately the more straightforward issues, such as health and safety. The audit report and CAP is shared together with this first letter. A second letter focuses on the more difficult issues such as living wages, freedom of association and overtime.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Insufficient 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.	0	6	0
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Requirement: Manroof's monitoring system should identify and address high risk issues that are specific to the affiliates' sourcing practices. FWF provides policies and country-specific requirements to affiliates. Priorities in remediation efforts are guided by these policies.

Comment: Manroof did not consider specific risks in Turkey, such as the wide-spread deployment of Turkish refugees in garment factories, before starting to source from two suppliers in Turkey.

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

Comment: Manroof is always open to cooperate with other FWF member companies and has reached out to other FWF members on several occasions to this end. In addition, Manroof is cooperating with two other FWF members at a supplier in India.

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: Manroof made an effort to visit all production sites in low-risk countries in 2015 and has informed them of FWF membership requirements. This has resulted in suppliers returning the completed CoLP questionnaire and posting of the worker information sheets.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	95%	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.	3	3	0
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Comment: Manroof has visited many external producers in Europe. This has helped to convince external producers concerned to complete the FWF questionnaire.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	68%	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.	2	3	0
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Comment: When using external producers, Manroof prefers to source from companies that are member of Fair Wear Foundation. In 2015 it sourced from external producers that sell products from FWF member brands, accounting for 68 percent of the total purchasing volume souced from external producers.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 22

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	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

Comment: Manroof visited suppliers in High Risk and Low Risk countries in 2015 and consistently checked whether the COLPs were posted. It has also requested its suppliers to send photos of the posted COLPs and was able to show proof.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	33%	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.	2	4	-2
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Comment: Manroof has arranged WEP trainings at two suppliers in 2015. However, these were not very successful as little importance was attached to it by the suppliers. Management did not show up and very few workers attended the training.

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
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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
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COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 5

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: 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.	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: The CEO of Manroof makes all the decisions regarding sourcing. Together with a colleague in charge of production, he also follows up on CSR issues at the suppliers. Furthermore, a CSR consultant in China hired by Manroof visits the suppliers to follow-up and checks status of remediation.

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: Manroof uses one agent based in Hong-Kong which follows up with Manroof's bag supplier in China. The agent has a very good understanding of FWF requirements and, together with Manroof's local consultant, follows-up actively on corrective actions.

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
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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 FWF active countries. Manroof should motivate its main supplier(s) to join WEP trainings.

Comment: Manroof has arranged WEP trainings at two Chinese suppliers in 2015. However, these were not very successful as little importance was attached to it by the suppliers. Management did not show up and very few workers attended the training.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	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.	N/A	4	0
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Comment: All of Manroof's production in 2015 was either in low-risk countries or in countries where WEP is offered, such as China, India and Turkey.

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 11

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Insufficient	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.	-2	6	-2

Requirement: After the end of each financial year, Manroof must confirm their list of suppliers and provide relevant financial data. A complete suppliers list means ALL suppliers are included.

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: 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, the CEO has visited all of the main suppliers in China last year, which has helped to understand where Manroof production takes place. Nonetheless, Manroof did not visit the new suppliers in Turkey and is thus not aware where specifically Manroof products are made and whether subcontractors were used in the process. In addition, Manroof was not informed of a subcontractor used for printing at a supplier in China, which was identified through a FWF audit.

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: The 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: -1

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 the company website, social report and the company catalogue. Membership is described in correct wording. During the last brand performance check Manroof was asked to remove all on-garment communication, which is reserved only for FWF member companies that are in the Leader category. It has done accordingly.

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: 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
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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 evaluated FWF membership and weighing the pro's and con's of FWF membership vis-a-vis other initiatives such as BSCI and SA8000. It has recently also joined BSCI.

7.2 Changes from previous Brand Performance Check implemented by affiliate	75%	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: At the brand performance check over the 2014 financial year, the following requirements were included:

1. 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.
 2. Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold.
 3. FWF affiliate should receive a completed and returned questionnaire from external brands resold by the affiliate.
 4. Manroof needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.
- Progress was made with posting the CoLP at its suppliers in low-risk countries, paying annual visits to suppliers in low risk countries and receiving the FWF questionnaire from external brands. However, questionnaires from new suppliers were not consistently requested.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

Manroof suggested that it would help if FWF would be better known in Switzerland.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	21	40
Monitoring and Remediation	22	35
Complaints Handling	5	7
Training and Capacity Building	11	11
Information Management	-1	7
Transparency	4	4
Evaluation	6	6
Totals:	68	110

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

62

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

06-04-2016

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.