



BRAND PERFORMANCE CHECK

Maier Sports GmbH & Co KG

this report covers the evaluation period 01-01-2016 to 30-06-2017

ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

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

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of 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 member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Maier Sports GmbH & Co KG

Evaluation Period: 01-01-2016 to 30-06-2017

MEMBER COMPANY INFORMATION	
Headquarters:	Kongen, Germany
Member since:	01-06-2011
Product types:	Outdoor, Sportswear
Production in countries where FWF is active:	Bangladesh, China, India, Turkey
Production in other countries:	Germany, Italy
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	84%
Benchmarking score	51
Category	Good

Summary:

Maier Sports has shown sufficient progress in meeting performance indicators. With a monitoring percentage of 84%, Maier Sports meets the monitoring threshold required after three years of membership. Maier Sports obtained a benchmarking score of 51 points. Therefore, FWF is placing Maier Sports in the 'Good' category.

This Brand Performance Check report covers the period 1 January 2016 to 30 June 2017, due to a change in financial year at Maier Sports. During this period, Maier Sports continued working with its main Turkish supplier and its three Chinese joint ventures. It maintains long-term relationships with most factories. The brand used more than 20 subcontractors to produce its garments. There were significant changes in the suppliers used for production, which severely limits Maier Sports' ability to monitor and follow up on risks and corrective actions.

During the Brand Performance Check, Maier Sports could not always provide the necessary documentation concerning photos of the Code of Labour Practices, audit reports, audit quality assessment tools and follow-up actions. This resulted in a lower score on the indicators than in previous years. FWF strongly recommends Maier Sports to improve its management systems for documenting efforts to improve working conditions. Furthermore, the brand should develop a strategy for a sustainable supply chain that reduces the frequent change in subcontractors. Lastly, Maier Sports should invest time and resources to develop a strategy for living wages at its main suppliers.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is FWF's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

Needs Improvement: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	83%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: Maier Sports mainly sources its products from four main suppliers: it owns the Turkish factory and it has a joint venture with three Chinese factories. In case of a shortage of production capacity, these suppliers are allowed to subcontract to pre-approved suppliers. In total, Maier Sports had production at 26 factories in the above-mentioned period.

Recommendation: FWF recommends Maier Sports to consolidate its supplier base where possible, reducing the total number of suppliers and reduce the total number of authorized subcontractors. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management and sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	9.6%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: Maier Sports places production at about 20 subcontractors. Compared to 2015, many subcontractors were substituted, approved or re-used after they had not been used for several years. Although Maier Sports approves of subcontractors, it does not control at which subcontractor production is placed. That decision is taken by one of its main suppliers, depending on the available capacity of the subcontractor.

Recommendation: FWF recommends Maier Sports to consolidate its supply base by limiting the number of suppliers in its 'tail end'. It should only work with a small number of pre-approved subcontractors. To achieve this, Maier Sports should determine whether suppliers where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management and sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	83%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: With most of its suppliers and subcontractors, Maier Sports has long term relationships. The member does have a high turnover in the use of subcontractors, although they have been working with most of the subcontractors for a longer period of time.

Recommendation: FWF recommends Maier Sports to maintain stable business relationships with suppliers and limit the total number of subcontractors in use. The length of the relationship could be one of the indicators upon which a decision could be made.

It is advised to describe policies regarding maintaining long term business relationship in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All new production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: Maier Sports started relationships with 5 new suppliers. All suppliers signed the questionnaire before production took place.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all new production locations before placing orders.	Intermediate	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.	2	4	0

Comment: The selection process for a new supplier is done by the CEO of Maier Sports, and most of the times in cooperation with the four main suppliers. In China, Turkey and India, the factory or agent can propose a subcontractor that is then often visited by the CEO of Maier Sports.

During such introductory meetings, labour standards are discussed. Often, Maier Sports asks for an existing audit report before orders are placed. At several of its Indian suppliers that are a small enterprise, no report was available.

Maier Sports is aware of labour rights issues on a country-level. Labour standards are part of the decision-making process, but could be further integrated in a systematic manner.

Recommendation: FWF recommends Maier Sports to further integrate human rights due diligence at new suppliers by ensuring that it knows the labour rights situation in the factory before placing orders. A risk analysis as part of a standardized decision-making process of selecting new suppliers is an important step to mitigate risks and prevent potential problems.

Conducting pre-audits or analysing existing audit reports can be a way to assess the level of working conditions before deciding to start or continue the business relationship. In case no existing audit report is available, it is strongly recommended to further inquire about wages, working hours and specific country risks such as homeworkers in India. Furthermore, it is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

Comment: Maier Sports has a systematic, yet informal approach, of evaluating supplier compliance with the FWF Code of Labour Practices. It does not have a systematic overview regarding the progress of all suppliers. It ensures and regularly checks whether the Worker Information Sheet is posted.

The CSR officer makes handwritten notes about the improvements implemented by the supplier. Due to the very small amount of orders at its Indian suppliers, Maier Sports has not audited them. FWF requirements are discussed by the Indian agent with its subcontractors. Feedback from these suppliers is then shared with Maier Sports.

Maier Sports ended relationships with 13 subcontractors. Since the member did not have more than 10% leverage at most of its subcontractors, Maier Sports expects that it did not affect the suppliers' production that much.

It has no performance based system in place. Only in cases where the supplier does not make any progress to improve labour conditions, Maier Spors can decide to decrease orders.

Recommendation: Maier Sports 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. The system could contain information on whether and what information is missing per supplier and can include outcomes of audits, training and/or complaints. Also, Maier Sports should formalise its system of following up on CAPs of suppliers to better track improvements.

As it is not always possible to reward suppliers with more volumes, the member company could look into other incentives that reward supplier's commitment towards the CoLP. An example would be to offer buyer paid training for skill building/capacity development.

Furthermore, Maier Sports is strongly recommended to bring the number of subcontractors under control. As it has long term relationships with its Indian suppliers, Maier Sports should put effort into evaluating its Indian suppliers on violations of decent working conditions.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

Comment: With most of its suppliers, especially its own production in Turkey as well as its joint ventures in China, Maier Sports cooperates closely to plan production. Maier Sports has a lead time of about 18 weeks for its seasonal products and for its Never Out of Stock items from India and China. The lead time is shorter for its Turkish supplier.

Specials for customers can be delivered on a shorter notice. In case a customer orders a special on a short notice, Maier Sports will shift production of Never Out of Stock-items. Maier Sports makes forecasts and receives weekly updates regarding the production process. If suppliers highlight problems with on-time production, Maier Sports prioritizes orders, considers air-freight or allows the factory to use pre-selected subcontractors.

Its main suppliers are responsible for the production planning at its subcontractors and agreeing on a delivery date. Maier Sports is not involved in planning production at its subcontractors. Technicians visit the factories frequently during production to consult the suppliers.

Only its Turkish supplier uses standard minutes per style. All other suppliers do not calculate the standard minute per style, but estimate how much time the production of a piece of garment would cost. Therefore, Maier Sports is not aware of the factories' total production capacity in minutes. This limits its ability to plan according to capacity. At its main suppliers where Maier Sports is often the only customer, excessive overtime occurs, which is a clear indication that the production planning does not support reasonable working hours.

Requirement: A good production planning system needs to be established based on the production capacity of the factory for regular working hours. Since Maier Sports is the only customer at its Chinese joint ventures, Maier Sports has a larger responsibility to ensure that its production planning does not lead to excessive overtime.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

Comment: At two of its Chinese joint ventures, excessive overtime is taking place. At two other Chinese suppliers, audit reports showed that excessive overtime is taking place. At one of its main Chinese suppliers, a 2017 FWF audit showed that excessive overtime no longer took place. Maier Sports is well aware of root causes, like seasonal production, late designs, late delivery of fabric and zippers, and subcontractors that refuse orders due to the fact that they have Chinese orders that are less complex.

Maier Sports took efforts to reduce excessive overtime at its main Chinese suppliers by improving the delivery of fabric and zippers and extending the delivery time. It has not yet verified whether the measures led to a reduction in excessive overtime.

Requirement: FWF requires Maier Sports to ensure that its own production planning improves by ensuring a timely delivery of designs, fabric and zippers. With its main suppliers, it should work towards a more integrated system based on the actual production capacity.

Recommendation: FWF recommends Maier Sports to assist the factories in filling production gaps in low seasons to ensure a stable order flow. Furthermore, FWF recommends to hire a consultant to improve its production planning. FWF can recommend consultants upon request.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company'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

Comment: At its own production site in Turkey, Maier Sports uses open cost calculation. It is aware of the total costs in the factory, including the labour costs. It has calculated the cost per minute per style, but did not yet calculate the labour minute cost. At its Chinese joint ventures, Maier Sports does not have an open costing model. Maier Sports does make estimates of costs per style and compares those estimates with the proposed price of the supplier. Maier Sports is aware of wage levels in China, with FWF audits as an important source of information.

At its Indian suppliers, Maier Sports relies on the price given by the supplier. In general, Maier Sports feels responsible for its suppliers and works on the basis of trust and long term relationships. It does not constantly push its suppliers for a lower price, but does compare price levels and negotiates prices.

Recommendation: FWF recommends Maier Sports to learn more about the standard minute per style and the price paid per minute. Maier Sports should work towards an open costing model with its Chinese joint ventures. The open costing model would help to support prices that are based on a division of direct labour costs, indirect labour costs and overhead costs. This forms the basis for ensuring enough is paid to cover at least the legal minimum wage and for making steps towards a living wage.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF member companies 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

Comment: Three FWF audits were conducted in 2016 and the first six months of 2017. The audit reports showed that legal minimum wages were paid in the factories. BSCI-reports of other factories also show that legal minimum wages are paid.

At its Indian suppliers, Maier Sports has no data about legal minimum wages, while this may pose a risk.

Recommendation: FWF strongly recommends Maier Sports to investigate whether legal minimum wages are paid at all its Indian suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	No efforts shown.	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	0	8	0

Comment: Maier Sports knows the labour costs of its factory in Turkey. With its Chinese Joint Ventures, it is discussing transparency in labour costs. Through FWF audits, Maier Sports is aware of living wage levels. However, Maier Sport does not yet use wage ladders systematically to assess wage levels and to agree on target wages with any of its suppliers. No discussions were held with the suppliers concerning living wages.

Wages at its suppliers were increased, and additional bonuses and in-kind benefits were provided by the suppliers. Maier Sports did not verify how the increase in wages relates to living wages.

Requirement: Maier Sports buys exclusively at several supplier and owns one supplier. Therefore, Maier Sports is held more accountable for implementing adequate steps. The member is expected to take an active role in discussing living wages with its suppliers and should take steps to work towards living wages.

Recommendation: As a first step, Maier Sports could analyse how the current wage levels relate to a living wage level. It could discuss with workers what they believe would be a living wage in their region.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	8%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	1	2	0

Comment: Maier Sports owns the production site in Turkey.

PURCHASING PRACTICES

Possible Points: 46

Earned Points: 26

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	84%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	0%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Meets monitoring requirements for tail-end production locations.	No	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Total of own production under monitoring	84%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100% 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: Maier Sports has designated the CSR officer to follow up on issues identified by the monitoring system. The CEO is also involved in following up on issues, especially in India.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Comment: Maier Sports mostly uses BSCI audits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	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: Maier Sports shared three FWF audit reports with its suppliers and set up timelines. At one factory, there were worker representatives, but Maier Sports did not involve the worker representatives when sharing the reports and in following up.

Maier Sports does not set up specific timelines with its suppliers regarding BSCI-audits as it considers that all issues should be resolved by the supplier before the next BSCI-audit (usually after a year).

Requirement: FWF requires Maier Sports to involve worker representatives where applicable.

Recommendation: FWF strongly recommends Maier Sports to set up specific timelines with suppliers regarding BSCI-audits. Maier Sports should prioritize issues together with factory management, especially in case of issues that need immediate remediation. Maier Sports should keep track of the issues continuously and should verify whether issues are resolved in accordance with the agreed timelines.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Insufficient	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	-2	8	-2

Comment: At its main Turkish supplier, Maier Sports did follow up on several issues, but a recent BSCI-report showed a deterioration of the situation at the supplier. At its other main suppliers, Maier Sports was not able to show follow up and/or BSCI-reports actually showed a deterioration of the situation. The same goes for its Chinese subcontractors.

Maier Sports collected audit reports from the Bangladeshi Accord and BSCI of its two Bangladeshi suppliers, but the reports were not discussed during a visit.

Requirement: Resolving and remediating non-compliances is one of the most important criteria FWF Member companies can do towards improving working conditions. FWF expects Maier Sports to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	97%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: Maier Sports visited nearly all of its suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 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

Comment: Maier Sports collected several BSCI-audit reports of its suppliers. Maier Sports did not use the Audit Quality Assessment tool and was not able to show follow up at the time of the Brand Performance Check.

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.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Insufficient result on all relevant policies	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	-2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Insufficient			-2	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2

Comment: Maier Sports used two new subcontractors in Bangladesh. Both suppliers are a member of the Bangladesh Accord on Fire and Building Safety. Maier Sports collected audit reports from the Accord and BSCI. One of the suppliers showed good progress on the Accord audit reports, while the other supplier had hardly improved.

During a visit to the suppliers, the audit reports were not discussed and there was no active follow up to the reports. The suppliers did not participate in the FWF Fire and Building Safety workshop nor in the WEP Gender Based Violence-training.

Requirement: Maier Sports should make sure all production locations participate in the Fire and Building Safety awareness raising workshop for top management as a basic requirement of the enhanced programme on monitoring and remediation. FWF offers the workshop at least twice a year in Bangladesh. Also, Maier Sports should actively follow up on the audit reports.

Recommendation: Maier Sports should share responsibilities with their production locations as business partners to improve workers' safety at the workplace. At a minimum, the member company should provide necessary support to the suppliers. In terms of fire and building safety, Maier Sports could offer financial or technical support, or offer flexible lead time so that factories could prioritize remediation.

In terms of ensuring women's safety at work, the brand should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. FWF local team has extensive experience on supporting both employees and employers in setting up anti-harassment systems. FWF local team could provide training and regular support to suppliers upon request.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: Maier Sports took efforts to actively cooperate with other FWF members. At one supplier, Maier Sports reached out to another FWF member several times, but unfortunately this has not yet led to cooperation. At two small Indian subcontractors, a FWF member stopped sourcing, while Maier Sports continued cooperation with another FWF member, although for both FWF members a small amount of production is done by the suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	1	2	0

Comment: Maier Sports sources very limited amounts from an Italian and German supplier. The brand collected the signed questionnaires from both suppliers. The member checked whether the Worker Information Sheet was posted at the German supplier, but could not show a picture of a posted Worker Information Sheet at its Italian supplier.

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:

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits above the minimum required monitoring threshold.	Not applicable	FWF encourages all of its members to audit/monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	3	0

Comment: Maier Sports does not reach the minimum required monitoring threshold.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	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	2	0

Comment: Maier Sports does not resell other brands.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).		FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

MONITORING AND REMEDIATION

Possible Points: 29

Earned Points: 8

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	4	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	2	
Number of worker complaints resolved since last check	2	

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: The CSR-officer is responsible for following up complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 System is in place 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 production location visits, etc.	0	2	0

Comment: Maier Sports was not able to show that the Worker Information Sheet was posted at its new suppliers.

Requirement: Maier Sports 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. The member should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Recommendation: It is suggested to ask production locations 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.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Percentage of FWF-audited production locations where at least half of workers are aware of the FWF worker helpline.	43%	The FWF complaints procedure is a crucial element of verification. If production location 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. Production location participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited production locations where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of production locations in WEP programme.	2	4	0

Comment: Five FWF audits were conducted and three WEP-basic training sessions were held at its suppliers. At least half of the workforce of approximately 43% of the factories are aware of the FWF worker helpline.

Recommendation: Maier Sports can stimulate its suppliers to participate in WEP training sessions, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition to sending the worker information sheet, Member companies can use the worker information cards available for download on FWF's website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

Comment: At its main Turkish supplier, FWF received four admissible complaints. One involved the dismissal of a worker, while another complaint dealt with the unequal treatment of a worker that had to take care of a sick child. In both cases, a settlement was reached in which both workers left the factory with compensation.

Two complaints concerned communication and harassment of a line supervisor. After follow up by the brand and FWF, workers reported that the harassment had stopped.

In relation to the first two complaints, Maier Sports wishes to improve HR-systems by documenting performance and training HR staff .

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company 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	0

COMPLAINTS HANDLING

Possible Points: 13

Earned Points: 6

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: Maier Sports informed all staff about FWF membership requirements with its Maier Sports Magazin, an internal newsletter and also by posting the FWF CoLP at the company's premises.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: At Maier Sports, technicians as well as the CEO are in direct contact with suppliers. They are partly engaged to implement social standards at the production sites. The CSR officer participated in the FWF annual conference, the German stakeholder meeting, and webinars.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	0

Comment: Maier Spors has two intermediaries. One intermediary is a main supplier in India that informs subcontractors about the FWF Code of Labour Practices. At only one Indian supplier an audit has taken place and a Corrective Action Plan was set up. At its other Indian suppliers, implementation of the FWF Code of Labour Practices by the agent and the CEO of Maier Sports is limited to visible issues. The other intermediary is a German agent which has its production location in China. Maier Sports could not show how the intermediary was informed of the FWF CoLP (besides the questionnaire) and how the intermediary actively followed up on improving working conditions.

Recommendation: FWF recommends to actively inform the German intermediary about the FWF CoLP and include the intermediary in following up on issues related to the FWF CoLP.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Production location participation in Workplace Education Programme (where WEP is offered; by production volume)	45%	Lack of knowledge and skills on best practices related to labour standards is a common issue in production locations. 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

Comment: Maier Sports trained two of its most important suppliers and one subcontractor on the FWF CoLP and FWF worker helpline through the WEP-basic training.

Recommendation: FWF strongly recommends to enroll more suppliers in the WEP-basic training. Furthermore, Maier Sports should repeat WEP-basic training to reach more workers.

FWF strongly recommends enrolling its Bangladeshi suppliers in the FWF WEP training programme against Gender Based Violence.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Production location participation in trainings (where WEP is not offered; by production volume)		In areas where the Workplace Education Programme is not yet offered, member companies 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

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 8

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 member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: Maier Sports has in-depth knowledge of its production sites. Suppliers and subcontractors are visited regularly by staff of Maier Sports. Its factory and joint ventures can propose the use of a subcontractor to Maier Sports. After approval by Maier Sports, orders can be placed at the subcontractor.

Maier Sports is not yet aware of all the printing and embroidery subcontractors that are used by its main suppliers. Furthermore, it is not aware whether other subcontractors again subcontract the orders.

Recommendation: FWF recommends Maier Sports to complete its supplier list by adding printing and embroidery subcontractors. Furthermore, Maier Sports should assess the risk of further subcontracting by the subcontractors, especially with the risk of Indian homeworkers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Comment: Maier Sports informs its staff through weekly meetings and the internal newsletter. Technicians and the CEO are briefed before visiting suppliers and report back to CSR officer after they return. Staff can access audit reports and CAPs.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Maier Sports communicates in line with FWF Communications Policy. No significant problems were found. Maier Sports does communicate a fairness promise.

Recommendation: Although it is not against FWF Communication Policy, FWF recommends to change the fairness promise as this might give consumers the image that Maier Sports already produces its clothing under fair working conditions.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Performance Checks, Audits, and other efforts lead to increased transparency	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: Maier Sports published the 2016 Brand Performance Check report online. The member does not publish audit reports or production locations.

Recommendation: FWF recommends Maier Sports to publish one or more of the following reports on its website: previous brand performance check reports, audit reports, and supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Inaccurate or not done	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	-1	2	-1

Comment: Maier Sports did not send in a social report.

TRANSPARENCY

Possible Points: 6

Earned Points: 2

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: Maier Sports' top management is highly involved in FWF membership. Annual evaluations are done with the CSR officer.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	66%	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.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: In the last Brand Performance Check, Maier Sports received three requirements. Two dealt with communication and worker training. Maier Sports actively followed up on these requirements. Maier Sports did not follow up on the requirement on living wages.

Requirement: It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the requirements mentioned in the last Brand Performance Check.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

Maier Sports had several recommendations for FWF. Those were:

- Have an online FWF questionnaire that can be filled in by the factory and checked by the brand.
- Revise the FWF audit reports to make it more readable and easier to assess priorities.
- FWF needs to contact BSCI and customers of FWF brands to explain FWF standards and ensure that FWF audits are approved by such organisations.
- In new BPC Guides: FWF should put on the first pages what has changed compared to the previous year.
- FWF should make more clear which BPC guide is for which year. It was not clear which guides had to be used for 2016 and 2017.
- FWF should organize webinars about new BPC Guides but spread it over two weeks' time instead of offering it only during 1 week
- FWF should ensure that the cost of dinner during the International Stakeholder Meeting (before Annual Conference) reflects the goal we stand for.
- FWF should cooperate with the Bundnis and communicate more clearly about its cooperation with the Bundnis.
- FWF should continue its support hour system and give more in-house training to brands.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	26	46
Monitoring and Remediation	8	29
Complaints Handling	6	13
Training and Capacity Building	8	11
Information Management	4	7
Transparency	2	6
Evaluation	6	6
Totals:	60	118

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

51

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

20-12-2017

Conducted by:

Wilco van Bokhorst

Interviews with:

Simone Mayer - CEO

Agnes Neeth - CSR officer

Dennis Dietrich - Gonso marketing officer