



# BRAND PERFORMANCE CHECK

---

Mini Rodini AB

PUBLICATION DATE: MARCH 2019

this report covers the evaluation period 01-01-2018 to 31-12-2018

## 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# BRAND PERFORMANCE CHECK OVERVIEW

Mini Rodini AB

Evaluation Period: 01-01-2018 to 31-12-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Stockholm, Sweden
Member since:	01-01-2016
Product types:	Fashion, Sportswear
Production in countries where FWF is active:	China, India, Turkey
Production in other countries:	Lithuania, Portugal
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	91%
Benchmarking score	79
Category	Leader

## Summary:

Mini Rodini has shown advanced results on performance indicators and has made exceptional progress, especially with its work on living wage. With a monitoring percentage of 91% and a total benchmarking score of 79, the brand is classified as a leader for the second year in a row.

Mini Rodini has increased its prices for its main Turkish supplier and its subcontractors and its main Indian supplier. In Turkey, the increased prices cover the payment of a full living wage for half an average household, even though the member does not buy more than 60% of the production volume. This means that in 28% of Mini Rodini's supply chain workers earn a living wage, making the company a frontrunner in the industry. In its main production location in India, Mini Rodini additionally pays out its share of the living wage, based on its leverage at the supplier.

The member company takes training of suppliers very seriously. Mini Rodini has enrolled seven production locations (that together make up almost 45% of its supply chain) in a FWF training module.

With regard to production planning and pricing, FWF advises Mini Rodini to adopt a more systematic approach. Labour minute costing per style should inform the brand's planning system and price setting. Mini Rodini shows much commitment to follow up on CAP findings and complaints. A next step would be to analyse what CAP and complaint issues are more structural and develop an approach to prevent these issues from occurring throughout the supply chain. Suppliers who do better on issues such as overtime may inspire other suppliers to improve. Therefore Mini Rodini could explore whether facilitating supplier exchanges where suppliers can learn from each other could be a tool to tackle root causes of recurring CAP issues.

## 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.	74%	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.	3	4	0

**Comment:** In 2018, the the percentage of production volume from production locations where Mini Rodini buys at least 10% of the production capacity increased from 51% to 74%. In 2018, 29 production locations have been active for the member. An important factor in maintaining a low number of suppliers, is to create an assortment plan with a minimal amount of niche products. Placing few orders of a low selling products would mean Mini Rodini has very little leverage in the factory in question. For this reason, Mini Rodini works towards including a minimal amount of niche items in their assortment plan.

Mini Rodini stopped with two suppliers, one because they didn't want to continue with the member and the other one because the woolen blankets were a one off product.

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.	8%	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:** Mini Rodini has a consolidated supply base and distributes the majority of its FOB to key suppliers. A few suppliers are used for small orders of special/seasonal items. Per product item Mini Rodini mostly only sources from one supplier. However, they needed to add a Portugese and Lithuanian supplier in 2017 and 2018.

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.	41%	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.	2	4	0

Comment: The percentage of production volume from production locations where a business relation exists for at least five years has increased from 21% to 44%. Though it is not written down, Mini Rodini does not want to change factories. If a relationship ends that is mainly because of quality issues or the supplier not wanting to produce smaller orders. Many suppliers do not want to produce children's clothing because of the many sizes and more stringent safety requirements.

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: Mini Rodini could show the returned questionnaires for a random selection of suppliers. As the member did not know that there is a Chinese version available, the Chinese factories have not signed the questionnaire as they do not understand English. All Chinese suppliers have been visited though, and minutes of these visits show that FWF membership and CoLP compliance has been discussed extensively.

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.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

**Comment:** Mini Rodini has a clear sourcing policy with human rights due diligence as an important element of the selection process, detailing all steps needed before a production location can be added. This policy addresses environmental standards (for eco-friendly materials and various certifications of factories) and social compliance requirements for new suppliers. It includes prioritized critical risks concerning its specific product assortment such as: unauthorized subcontracting and Syrian refugees in Turkey.

Sourcing of new production locations is done by the Sustainability Manager, which means that working conditions and social compliance is looked at first, using a supplier profile checklist. Suppliers are presented to the responsible buyer and Head of Assortment and Production and an applicable business related interview and quotation takes place by the buyer. After all data is collected, the group takes a mutual decision which supplier to choose to start working with.

When an order is placed, the factory is enrolled in Mini Rodini's social monitoring program. The CoLP posters are hung on their walls, informing workers about their labour rights and providing them with the number of the complaint helpline. When the factory is in a high risk country, Mini Rodini requests an existing audit report and the member will assess the quality with help of the FWF Audit quality-check.

In their contracts with suppliers, Mini Rodini stipulates that unauthorized subcontracting is not allowed. A direct supplier did move more of their production to an earlier disclosed subcontractor, because of increased orders. Mini Rodini was informed that this was caused by their increased orders.

Mini Rodini's Chinese outerwear supplier suddenly stopped their business relation with the member. Because the products were already ordered by costumers, Mini Rodini had to find a replacement swiftly. Two smaller production locations were suggested by the supplier and accepted by Mini Rodini. To do their due diligence, Mini Rodini arranged for Reassurance Network to conduct a monitoring visit, and follow up on the findings, advising the production locations on steps for remediation.

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, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0



**Comment:** Twice a year, before orders are placed for the next season, each supplier is evaluated with color coding and a performance assessment. Compared to other criteria, most weight is given to sustainability, production and pattern. The total score of each supplier is graphically compared to the other suppliers (made anonymous) of the member company. These comparisons are shown to the supplier, and Mini Rodini discusses a plan for improvement with each of them. It is not always possible that suppliers can be rewarded by higher order volumes. Suppliers are very interested to see how they score compared to the other suppliers. One Indian supplier scored equally bad in terms of quality and CoLP compliance, refusing to hang up the Worker Information Sheet. For these reasons, Mini Rodini informed them they will discontinue with them. For these cases the member has a responsible exit strategy in place. It usually takes a considerable time before the relation is discontinued, as Mini Rodini requires the suppliers to finish all fabric.

**Recommendation:** The member is encouraged to think of ways to reward suppliers who are highly committed towards implementation of the CoLP. This can take the form of buyer paid trainings, or handing out an award that can be attractive for suppliers to show to interested new clients.

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:** Mini Rodini plans full orders (fabric and products) at the same time. Lead time for fabrics as well as consideration of national holidays are taken into account. Delivery times are planned together with the factories. Mini Rodini is not yet working with labour minutes and knowing the capacity of the suppliers in more detail. This would lead to a stronger integrated system. Mini Rodini does inform suppliers in advance about forecasting but they do not promise anything too early as their collections are so different each time.

The work on design specifications is key to reducing overtime hours, and with two pattern makers in house, Mini Rodini is able to sketch as accurate as possible for order sizes. This minimizes the number of sample rounds and consequently there is more time for production. Mini Rodini is aware that changes to designs in later stages can have a significant impact on working hours. Because it sells children's clothing which is less influenced by fashion trends, it is easier to decide not to add changes to the designs. Buyers are aware that a delay in responding to suppliers asking for confirmations may cause a large production delay. The new Head of Production plans to include pictures of the finished product to the design specifications to even improve accuracy further.

The member has some basic styles which are now treated as seasonal. Mini Rodini aims to make these more of a staple product. The mindset of Mini Rodini's buyers is very solution oriented, and focuses a lot on the suppliers side. There is high tolerance of production delays.

**Recommendation:** FWF recommends Mini Rodini to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory by gaining more knowledge on available capacity of suppliers in production lines and available minutes.

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:** In 2018 one audits in China revealed excessive overtime. As the report was received in December, the member company has had only time to address this issue with the suppliers. Mini Rodini did visit the Chinese supplier and concluded that they need support with production planning. No root causes have been identified so far. As Mini Rodini received the audit report of their main Turkish supplier in late January 2019, discussion about the finding of excessive overtime has just started.

At a third audit in Turkey - shared with another FWF member -, the working hour situation could not be verified. This seemed due to the introduction of a new finger print system, that was not yet installed properly. This has been remediated since.

**Recommendation:** As the member is rather important for the Chinese supplier, it would be important to discuss how Mini Rodini's production planning can be improved to alleviate pressure on working hours. The member can also discuss this with their agent, who places even more orders at this supplier.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

**Comment:** Based on the design and estimated target volume and retail price, suppliers quote a price. Buyers do not work with open costing or run a plausibility check whether the prices the pay can cover the legal minimum wage.

However, it is important to note that over a third of the total production volume comes from production locations where Mini Rodini increased prices to cover (their share) of living wage for workers. An additional 20% comes from production locations in low risk countries.

**Recommendation:** FWF recommends Mini Rodini to expand their knowledge of cost break downs of their product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. First priority would be to make sure this level of transparency can be achieved with their suppliers. Mini Rodini is encouraged to provide buyers training on cost breakdown and information on wage levels in the different sourcing countries. This is all the more important for working with new suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

**Comment:** One audit report of a Chinese supplier, received in December 2018, showed that legal minimum wage was not paid for workers in lower paid departments. Mini Rodini already planned a visit to discuss the audit results and could therefore immediately take this up with the supplier. It seemed that the supplier did not understand how to calculate back from piece rate to check if legal minimum wage and appropriate overtime premiums were paid. Because of Chinese New Year the timeline for improvements was set to March, and the member expects to be notified soon about the progress.

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 and responds to root causes for wages that are lower than living wages in production locations.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	6	6	0

**Comment:** Mini Rodini discusses living wage with all suppliers, asking them about the causes for wages lower than living wage. Only one supplier has been so direct as to say that prices are too low for them to pay living wages. The member assumes that this is the case for more suppliers, even if they don't mention this directly. The member company did not only develop an action plan, but has already started implementation. Basis formed the wage calculation sheets to calculate the gap between the existing wage levels and different living wage benchmarks.

By increasing their prices, Mini Rodini pays out their share of the living wage at their main Indian supplier, based on their leverage of 4%.

At their main Turkish supplier and all its subcontractors, Mini Rodini has calculated the gap between existing wage levels and the living wage. Even though their leverage is around 50%, the member company has increased prices to cover 100% of the gap towards this living wage.

Mini Rodini plans to include all suppliers in their living wage strategy, by increasing their prices across their supply chain and consequently accepting a lower margin. This shows a strong vision and systematic approach.

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).	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 member company's score.	Supplier information provided by member company.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	4	4	0

**Comment:** Mini Rodini pays their share of living wage at their main production location in India, and a price that covers full living wage at their main factories in Turkey and it's six subcontractors. The target wage in India is a living wage that is calculated for one adult. It is based on a worker's survey that Mlni Rodini conducted, and extensive research into different benchmarks. The target wage in Turkey is based on the benchmark of the Turk-Is trade union, and is informed by a workers' survey conducted at the production locations. It is based on the assumption that a family consist of two working adults together providing for two children. In both cases the extra money needed is absorbed by the profit margin and the total extra amount needed was calculated using the figures of the production department.

At the Indian supplier where Mini Rodini pays the living wage factor, the member struggled with the unpredictability of the extra costs, caused by discrepancies between packing lists and orders. To address this, starting from the SS19 invoices, all pieces were marked up with 6% and this percentage will stay the same into the future. 6% Was chosen as in previous calculations the average mark-up margin had made the average mark-up percentage between 5-7% higher than the original price. In this way the members aims to make the living wage strategy more sustainable, as the financial department will know from the start the exact extra costs to budget for.

Likewise, Mini Rodini also needed to adapt the pay out of the living wage factor at the Turkish factories. Initially, the premiums were added to worker's wage slips as a "LW Premium". To add the cost onto the buyers' FOB price, calculations were made on what the added margin per season would be, adding on the additional calculated costs of what was needed to arrive at the living wage levels for the three wage groups. The main supplier then added this margin onto each piece. However, this led to unpredictability of budget. Combined with the heavy currency fluctuation that led to the member heavily overpaying, it forced Mini Rodini to adapt. Since December 2018, the sum which is to cover the living wage premiums are sent in one invoice, without the margin being added to each piece. To make the costs more predictable, the sums will be paid in the same way twice or four times per year to the supplier, while workers will continue to receive the living wage each month.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	33%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	2	3	0

**Comment:** Mini Rodini pays living wage at one of their main factories in Turkey and it's six subcontractors and their main production location in India, totaling 33 % of their total FOB volume. Because in Turkey the member increased the prices to cover the full living wage, in 28% of Mini Rodini's supply chain workers earn a living wage,

In Turkey the payment of the living wage started in 2017 with three of the seven production locations belonging to the main supplier. This has gradually been extended to cover all seven production locations since the AW18 collection. Workers are paid an extra premium each month. The premiums were added to worker's wage slips as a "LW Premium". As the production locations are relatively small, it was possible to divide premiums into three different wage levels, with the lowest earners receiving more and with the higher earners receiving less.

In India the original roll out of the payments was adapted to address concerns from workers. Some office staff earned less than sewing workers, yet they did not receive a living wage factor initially. Additionally, all sewing workers received the same premium of 810 INR, despite differences in levels of skills and seniority. Workers thought this was unfair. Therefore this was adapted in May 2018. Democratically elected worker representatives from different committees in the factory set up a new committee called the Workers Committee. They drafted a policy for who would be eligible to receive living wage premiums, and these premiums were divided in four wage level categories. They decided to pay these premiums out in vouchers for the local supermarket. The payment of the vouchers have been verified by a third party accountant.

---

## PURCHASING PRACTICES

Possible Points: 47

Earned Points: 35



## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	69%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	22%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (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.
Requirement(s) for next performance check	In the tail end of Mini Rodini's supplier base, FWF requires the member to ensure it audits all production locations that are responsible for over 2% of production and production locations where Mini Rodini is responsible for over 10% of the location's production capacity.	
Total of own production under monitoring	91%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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 Sustainability Manager - who is part of Mini Rodini's production team - is designated to follow up on problems identified by monitoring system.

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

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: Mini Rodini could show that audit reports were shared with suppliers on time, and improvement timelines were set in a timely manner.

Recommendation: Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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.	Intermediate	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.	6	8	-2

**Comment:** The main Indian supplier of Mini Rodini was audited in December 2017. Even before the supplier received the report they already started remediation on the issues discussed in the audit exit meeting. The HR department of this supplier is very committed and their proactive approach on following up on CAP issues is one of the reasons why Mini Rodini likes to work together with them.

The member could demonstrate that following an audit report received in December 2018, it sat together with the Chinese supplier to draft an action plan for remediation. The member is under the impression that overtime premiums and annual leave are not paid correctly because the supplier does not know how much the costs will be. Regarding the excessive overtime, Mini Rodini offers support in production planning.

Together with another FWF member Mini Rodini followed up upon the CAP findings. The member could show remediation of CAP issues. The report shows that since the first audit in 2016 many findings were remediated.

**Recommendation:** FWF encourages Mini Rodini to continue strengthening their system to analyse how they might

have contributed to findings and what changes they can make in their purchasing practices. FWF also recommends the member to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

Excessive overtime and violations regarding social insurance are common problems in China. As one Chinese supplier of Mini Rodini actually has less excessive overtime, it may be interesting to connect them with Chinese suppliers where overtime is more problematic. In this way Mini Rodini can facilitate peer learning exchanges to approach structural issues on a broader level. This sort of approach can of course also be used for other structural CAP issues.

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.	96%	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:** All locations were visited in 2018 except for 5 locations that were visited in December 2017, and all visits are documented in excel to keep track of CoLP improvements. Mini Rodini has also visited dyeing and printing units.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

**Comment:** Mini Rodini collected external audit reports for different production locations. One audit report could not be accepted however due to the low quality. For another supplier, the member accepted a SA8000 certificate without requesting the audit report.

Mini Rodini used the Quality Assessment Tool and could demonstrate follow up for four existing audit reports that were requested.

**Recommendation:** When the assessment of an existing audit report shows that the audit only offers little information, the member could contact the brand liaison to discuss how to proceed. If existing audit reports do not include wage levels at the supplier, FWF advises the member to request this information from the supplier directly. Certifications without audit reports cannot be accepted for the monitoring threshold, as they do not offer a picture of what is going on on the work floor.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Advanced 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.	6	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	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	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Policies are not relevant to the company's supply chain			N/A	6	-2

**Comment:** Mini Rodini's supplier sourcing and due diligence policy includes an abrasive blasting policy that is shared with suppliers. The company does not create designs that need abrasive blasting for their looks. Mini Rodini makes use of other denim finishing processes such as laser and stone washing. These facilities are visited and a health and safety check is included in these visits.

With over one third of the total FOB placed in Turkey, Turkey is the largest production country for Mini Rodini. The member has a clear policy for Syrian refugees in Turkey. This is shared and monitored with both relevant agents and suppliers and always discussed during visits. All production locations in Turkey, including subcontractors, have been audited by FWF. One production location employs two Syrian workers, and Mini Rodini makes sure that there is no discrimination. The audit showed that a required health and safety training was conducted in Turkish only. To ensure that the Syrian workers are also aware of health and safety issues, the training has been repeated in Arabic. Mini Rodini enrolled four Turkish suppliers into the WEP Communication module, which gives an introduction on how effective communication can be a tool for problem solving.

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:** There is active cooperation with several FWF members.

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% AND member undertakes additional activities to monitor suppliers	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	3	3	0

Comment: All locations in low risk countries were visited and have posted the worker information sheet and returned the suppliers questionnaire. Mini Rodini also asks the different wage levels of these suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	FWF encourages its members to 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	2	0

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

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).	No external brands resold	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: 30

Earned Points: 28

### 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	1	
Number of worker complaints resolved since last check	3	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: The Sustainability Manager is appointed to address worker complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the FWF Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: Mini Rodini could demonstrate that all new production locations have the Worker Information Sheets posted. Mini Rodini distributes worker information cards to workers during visits, putting them in canteens and other accessible places.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	33%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

**Comment:** Mini Rodini enrolled two Chinese suppliers into the FWF Workplace Education Programme, which raises awareness about the eight labour standards and the FWF complaints hotline, which together account for 33% of Mini Rodini's production volume in high risk countries.

**Recommendation:** FWF recommends members to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline among a larger portion of its suppliers. Mini Rodini should ensure good quality systematic training of workers and management on these topics. To this end members can either use FWF's Workplace Education Programme (WEP) basic module, or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

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:** Mini Rodini received three complaints from the same supplier in India, and one from a supplier in China. The complaints in India, including a delay of outstanding payments of resigned workers, and verbally abusive management, seemed to be caused by a certain line manager. Mini Rodini addressed this issue by skyping and visiting the factory. The supplier made some changes in staff and subsequently the complainants informed the complaint handler that the work environment had improved and verbal harassment stopped. The delayed payments have also been paid out. The third complainant could not be reached, and therefore the complaint was closed.

The complaint in China was submitted mid November, and was about perceived unfair pay differences among finishing workers and overtime. Mini Rodini visited the supplier and discussed that the supplier should be more transparent about the different wage levels for different skills. The issue about excessive overtime is taken up as part of the CAP.

**Recommendation:** It is common for Chinese factories to not inform workers about different wage levels related to skills, or provide information on how piece rate is calculated. Therefore Mini Rodini is encouraged to take preventative steps by contacting other Chinese suppliers to check how they inform workers about wage calculations. Though it is acknowledged that the relation between the Indian supplier and FWF first needs to be improved, in the long run the member could consider enrolling the supplier in a FWF WEP violence prevention module, to support the creation of a better work environment.

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: 15

Earned Points: 10

---

## 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	0

Comment: Mini Rodini organises an annual CSR conference for all employees in which general sustainability discussions are held, and performance check results are shared. Mini Rodini's CSR guide includes FWF information is handed out to new employees.

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: Mini Rodini's sustainability manager is part of the production team. Before buyers plan a factory visit, the sustainability manager shares information and specific points for attention during a meeting. Often the buyer and sustainability manager visit suppliers together. When suppliers are evaluated by the production team, logistics and warehouse staff can also give input.

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 + actively support COLP	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.	2	2	0

**Comment:** In China the agent always accompanies Mini Rodini on visit. As the factory management does not speak English, the agent communicates with them, and discusses follow up on the CAP. The agent is very solution oriented. The agents in Turkey also follow up on the CAP issues.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	24%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	2	6	0

**Comment:** Mini Rodini enrolled five Turkish production locations, including two subcontractors, into the WEP Communication module, collectively accounting for 24% of Mini Rodini's production volume in high risk countries.

**Recommendation:** FWF recommends members to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions. To this end members can make use of FWF's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

Comment: The reports on the WEP Communication module for Turkey did not include recommendations how the member could follow up on these trainings.

## TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 7



## 5. INFORMATION MANAGEMENT

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

**Comment:** Each CMT location is visited regularly, by either Mini Rodini staff or agents. Some non CMT locations are visited as well. During those visits, it is checked if the needed material is present at the location and Mini Rodini ensures to be aware of the production processes of each factory, to double check potential subcontracting.

Mini Rodini has a subcontractor policy and agrees with suppliers that subcontractors can be used as long as they are already included in Mini Rodini's monitoring. The member is informed when more volume is placed at these subcontractors then initially foreseen.

Mini Rodini has demonstrated efforts to identify and register all production locations. No evidence of missing information on first-tier locations was found during this performance check.

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: Production staff and the Sustainability Manager travel usually together to factories. Frequent briefs and updates are given and the relevant staff is involved in the evaluation of each supplier.

---

## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

---

## 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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Brand Performance Checks, audit reports, and/or 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: Mini Rodini publishes the brand performance check on it's website. There are internal discussions about disclosing the supplier list to the public. Until now this has not been done.

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	For new member companies	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.	N/A	2	-1

Comment: As the brand performance check was conducted before the deadline of submitting the social report, this indicator is non applicable.

---

## TRANSPARENCY

Possible Points: 4

Earned Points: 3

---

## 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: Evaluation of FWF membership is conducted throughout the year, with top management being involved. CSR is discussed a lot in the management team and it is key for Mini Rodini's founder and Board.

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.	No requirements were included in previous Check	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.	N/A	4	-2

## EVALUATION

Possible Points: 2

Earned Points: 2

## RECOMMENDATIONS TO FWF

Mini Rodini would welcome support for marketing and communications, to help with clear messaging for consumers. With regard to the handling of complaints the member would appreciate a more neutral tone towards suppliers, and flexibility in the complaint process. The living wage incubator could improve on offering practical advice, for instance on how to deal with the risk of getting workers too much dependent on the living wage factor of buyer. It can gain from a more in depth understanding of the technicalities involved when working to increase wages.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	35	47
Monitoring and Remediation	28	30
Complaints Handling	10	15
Training and Capacity Building	7	11
Information Management	7	7
Transparency	3	4
Evaluation	2	2
Totals:	92	116

### BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

79

### PERFORMANCE BENCHMARKING CATEGORY

Leader

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

12-03-2019

Conducted by:

Niki Janssen

Interviews with:

Karin Iseman, Sustainability manager

Elin Linden, Buyer

Songul Can, Head of Assortment and Production

Malin Odelfelt, Head of Marketing

Gabriel Ingmarson, CFO

Nathalie Larsson, Head of Accounting