



BRAND PERFORMANCE CHECK

Mammut Sports Group AG

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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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Mammut Sports Group AG

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

MEMBER COMPANY INFORMATION	
Headquarters:	Seon, Switzerland
Member since:	25-09-2008
Product types:	Outdoor, Sportswear, Bags & Accessories
Production in countries where FWF is active:	Bangladesh, China, India, North Macedonia, Myanmar, Romania, Viet Nam
Production in other countries:	Germany, Latvia, Lithuania, Philippines, Poland, Portugal, Switzerland, Taiwan
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	92%
Benchmarking score	66
Category	Good

Summary:

Mammut has met most of FWF's performance requirements. The brand monitored 92% of its suppliers, which meets the required monitoring threshold after three years of FWF membership. With a score of 66 points, Mammut is placed in the 'Good' category.

In 2018, Mammut continued with its sourcing strategy to transfer production from China to Vietnam and Bangladesh. The brand made use of 63 production locations, which is a small decrease compared to last year. Mammut has long term relationships with its main suppliers which usually have multiple production locations in various countries. The shift in production locations by its main suppliers meant that Mammut had to build new relationships with those new factories, monitor them and follow up on labour standard violations. Mammut has a strategy in place to further reduce the total number of suppliers.

Mammut has good systems in place to monitor suppliers, evaluate their performance and assess country risks. However, the strategy chosen by Mammut and its main suppliers to change production locations continues to pose challenges in monitoring suppliers and actively following up on audit results.

In 2018, Mammut also made further progress on the topic of living wages. Using its initial research on price calculations by factories as the basis, the brand continued to research the current labour minutes per style and made an overview of the current wages paid to sewing workers in its most important factories. These are important stepping stones towards payment of a target wage in Mammut's production locations.

Compared to the year before, Mammut seems to have better control over the sourcing practices of its Japanese subsidiary. Mammut's purchasing department is nowadays controlling the placement of production at new suppliers by the Japanese subsidiary.

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.	40%	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.	2	4	0

Comment: Mammut sources from 15 countries and 63 production locations. The brand has made the strategic decision to move its production from China to Vietnam and Bangladesh. In this transitional period, it is building up leverage at the new production locations and the brand aims to consolidate its supplier base.

Recommendation: FWF recommends Mammut to continue to consolidate its supplier base where possible, and increase leverage at the main supplier(s) to effectively request improvements of working conditions. In addition, FWF recommends Mammut to take leverage into consideration when moving its production to Vietnamese and Bangladeshi production locations for its new suppliers. The brand should consider the risk of human rights violations at suppliers, the influence it has to bring change and the impact it can have at factory level.

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.	28%	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.	0	4	0

Comment: In 2018, Mammut aimed to reduce its tail end. Compared to 2017, Mammut has reduced the total number of production locations. However, the company has shown an increase in production locations with small production volumes due to subcontracting by some of its main suppliers to smaller production locations. Mammut's goal remains to consolidate its supplier base in the coming years.

Recommendation: FWF recommends Mammut to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, members should determine whether suppliers, where they buy less than 2% of their FOB, are of strategic relevance. Shortening the tail of their production will reduce exposure to social compliance risks for Mammut and will allow them to improve working conditions in a more efficient and effective way.

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.	37%	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: Mammut has been working for a long time with many of its main suppliers. The brand values these long-term relationships. These suppliers often have multiple production locations in various countries. Due to its new sourcing strategy, Mammut is moving production to new production locations but stays with the same main suppliers. Although Mammut knows the main suppliers very well, the brand will have to assess the status of working conditions at the new production locations and will have to build up new relationships with local factory management.

Recommendation: FWF recommends Mammut to maintain stable business relationships with production locations. Long term relationships support most aspects of the Code of Labour Practices and give factory management a reason to invest in improving working conditions.

It is advised to describe policies regarding maintaining long term business relationships 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: Mammüt fulfilled last years requirement to ensure that all new suppliers sign and return the questionnaire before first bulk orders are placed. In 2018, Mammüt started sourcing from 6 new production locations.

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 suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: New suppliers selected by Mammüt are assessed according to a scoring system. During visits by senior staff, Mammüt explains its position with regards to labor standards and FWF. Information like FWF's country studies, other stakeholder information and FWF's Health and Safety checklist is taken into account. It also collected several existing audit reports.

The Japanese subsidiary is now required to place production orders of all its suppliers through Mammüt's headquarters. Whereas in previous years signs of misalignment of this process between the headquarter office and the Japanese subsidiary was observed, in 2018 no such signs were found. Furthermore, the brand is phasing out small suppliers of the Japanese subsidiary except for production locations that cater for special styles.

In general, some factories were not visited by the company in 2018 and the FWF health and safety check was in some cases not carried out. The brand is aware of this and has taken steps to implement standard operating procedures on due diligence for factory visits.

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: Mammut keeps track of audit reports through a Master list. The Head of Vendor follows up on audit results during visits and emails. Reported progress is updated in the CAPs. Purchasers are informed of the CAP status and also assist in the follow-up of the CAP.

Mammut has a supplier evaluation system in which it scores human rights issues per supplier and its overall performance. It has set up a traffic light system where issues are marked as red (critical), orange (major) or yellow (minor issue). Supplier performance is evaluated annually and shared in meetings between the supplier and the brand.

Mammut does not yet have a performance-based system in place that rewards suppliers when they make good progress on social issues.

Mammut decided to stop production at one factory in 2018 as the factory management was not willing to improve labor conditions in the factory. Exiting this factory was done after careful consideration of the potential of the factory and willingness to improve by factory management. Mammut is aware of FWF's responsible exit strategy guidelines and applies them when needed. In the future, Mammut is considering to add the FWF responsible exit strategy guidelines in their internal manual.

Recommendation: FWF recommends Mammut to consider how it can stimulate progress on social issues, for example by offering price increases, bonuses or financial support to resolve issues.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: Mammut has two seasonal types of products (summer and winter) and a range of Never Out of Stock-items. Lead times are between 3 - 8 months, depending on the type of product.

Mammut agrees on a production capacity plan with its suppliers at the beginning of the year indicating order dates and order amounts. To facilitate balanced production planning, Mammut shares detailed forecast information with suppliers, which are updated monthly and include an estimate about the delivery of fabric. All suppliers need to agree on order dates. Mammut is able to shift a part of its Never Out of Stock-production to the low-season.

Mammut made progress in estimating the standard minute per style which it relates to the factory's quotations based on an open costing model. The brand does not know the exact total production capacity of each factory. For some critical products, Mammut reserves specific working lines in the factory.

Compared to last year Mammut has introduced a calculation sheet related to the forecast and actual production that allows the brand to recognize issues with production volumes at a particular factory in an early phase. If they recognize a potential issue, the brand proactively approaches the production location to discuss the issue Mammut observes. Mammut has reserved substantial margin time in its delivery cycles to ensure that order delays can be handled. In case of delay, Mammut either accepts the delay or considers splitting orders or air freight.

Recommendation: FWF recommends Mammut to learn more about the capacity of their production locations and discuss with the factories how to deal with the planning of production during peak season to prevent 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: In 2018, 5 out of 8 FWF audits showed that excessive overtime took place at the factories. At several factories, Mammut raised the issue and is discussing it with management. However, it remains a persistent issue in Mammut's supply chain.

One factory had multiple FWF-complaints about excessive overtime. Mammut has often addressed the issue with factory management, including a comprehensive root cause analysis. Despite significant efforts of Mammut, the factory has not shown significant improvements when it comes to labor conditions, especially when it comes to working hours. Therefore, Mammut informed factory management that it will stop production by gradually decreasing orders over the period of a year, applying the guidelines for a responsible exit strategy.

For the other four cases, Mammut raised the issue but did not do the same in-depth analysis of the root causes.

Recommendation: FWF encourages Mammut to apply the in-depth approach that it had done at the supplier with recurring complaints to all its factories where excessive overtime takes place.

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.	Advanced	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.	4	4	0

Comment: Mammut follows a partnership approach when negotiating prices. When developing a new style, Mammut involves its suppliers in the process and agrees on a target price based on feedback from suppliers as well as past experience. Part of the process is the discussion of an open costing sheet (fabric, CMT and trims).

The starting price can be higher or lower than the target price. Mammut and the supplier then work towards the target price by looking at the design and material costs. Once the price is set, it remains fixed for this specific style and is not renegotiated with every order. In their new costing sheets, Mammut is aware of the costs per labor minute.

In follow-up research, Mammut has been analyzing the wage levels of the sewing workers in their factories. As they mostly use FWF audits they have used the wage ladder information for this analysis which does not include all factories Mammut sources from. The brand is now generally aware of what the wage levels are in their production locations and could make a calculation on how it relates to their buying prices as they know the standard minutes per style.

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: In 2018, there were 2 audits that showed that minimum wages were not paid in factories. In one factory Mammut requested the factory management to follow up on the Corrective Action Plan after an FWF audit took place. However, factory management has not been active in resolving the CAPs. After several meetings with the factory management, Mammut has decided to phase out this production location due to continued non-compliance on legal minimum wages.

In another factory, the FWF audit mentioned that production took place in a specific production location of one of Mammut's main suppliers which were not known to Mammut at the time. Nevertheless, Mammut is remediating jointly with other member brands the CAP issues at this production location, including non-payment of a legal minimum wage.

Recommendation: FWF recommends Mammut to verify whether legal minimum wage issues have actually been resolved in case factory management claims so. Mammut could hire a local consultant or plan a monitoring visit of one of FWF's auditors to check whether the issue has actually been resolved.

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

Comment: No late payments were observed in 2018.

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.	Intermediate	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	6	0

Comment: Mammut is a participant of the FWF Living Wage Incubator, a platform to assist member brands in designing projects to work towards living wages with their suppliers. Mammut has done research about price calculations by factories and how factories calculate overhead, direct and indirect labor costs. As mentioned under 1.8, Mammut has built on this by doing further research on the wage levels of sewing workers in their production locations. The brand has not yet discussed possible solutions towards a living wage with their suppliers.

Recommendation: FWF encourages Mammut to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and long term business relationship.

FWF encourages Mammut to involve worker representatives and local organizations in assessing the root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally at Mammut and with supplier's top management, to form a basis for an embedded strategy.

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

Comment: Mammut does not have any production in factories owned by the member brand.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	None	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.	0	4	0

Comment: Although Mammut has done a lot of preparatory research on living wage in order to analyze wages in their factories, the brand does not yet have a plan on how to determine and finance wage increases to come to a living wage for factory workers. Moreover, the company has not yet selected factories to implement a specific living wage benchmark or target wage.

Requirement: Mammut should analyze what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: To support companies in analyzing the wage gap, FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

It is advised that the strategy for how to finance wage increases is agreed upon by top management.

In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

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	0%	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.	0	3	0

Comment: Mammut was not able to show that the brand had implemented a target wage or living wage benchmark for part of its production volume in 2018.

Requirement: The member is expected to begin setting a target wage for its production locations.

PURCHASING PRACTICES

Possible Points: 47

Earned Points: 24

Additional comments on Purchasing Practices:

Mammut has approximately 600 products in its apparel collection, divided into five different target groups: Alpine Climbing, Rock Climbing, Freeride/Snow, Backpacking/Hiking and Alpine Performance.

Mammut's WECARE strategy was launched in 2018, covering multiple CSR-related topics: animal welfare, clean production, reduced footprint and ethical production. The brand has set targets for all 4 areas. Detailed information on the WECARE strategy can be found in Mammut's social report.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	75%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	11%	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 Mammut's supplier base, FWF requires Mammut to ensure it audits all production locations that: <ul style="list-style-type: none"> • Produce more than 2% of the member's volume • Where the member has more than 10% leverage • Where a high risk policy applies • Where a complaint is submitted. 	
Total of own production under monitoring	92%	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 Head of Vendor is responsible for following up on issues identified by the monitoring system. This happens in close cooperation with other purchasers and technical staff.

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: In 2018, nine FWF audits were conducted. Mammut shares audit reports with the factories as soon as Mammut receives the report from FWF. It ensures that timelines for the corrective action plan (CAP) are set up. Mammut did not share the audit reports with available worker representation at these production locations. The brand requested that FWF makes a contact point available in each factory, e.g. an email address of the worker representation.

Recommendation: In the case of worker representation at a production location, FWF recommends that the CAP should be shared with worker representatives as well as involved in setting the timeframe for realizing improvements. 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.

Before an audit takes place, Mammut is recommended to check with the supplier whether worker representatives are active in the production location. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting.

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: Mammut has set up a traffic light system to track social issues at suppliers based on the audit outcomes and CAPs. The brand marks those issues as red, orange or yellow. Mammut is especially strong in keeping track of the progress towards the resolution of existing CAPs. Despite the fact that Mammut keeps track of the progress made, issues were sometimes closed without proper verification by Mammut or an independent third party.

One of the challenges Mammut faced in following up with suppliers, is that due to a growing number of suppliers, Mammut needed to focus its efforts by mainly resolving significant 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.	84%	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: Mammut regularly visits most of its suppliers by CSR staff, product developers or technical staff to discuss labor standards.

In 2018/2019, the brand has been working on a Standard Operating Procedure (SOP) for factory visits in order to allow all staff traveling to suppliers to collect the required evidence needed by FWF, including an occupational health and safety check, photo proof of the situation in factory, evidence on CAP follow-up and posting of the Worker Information Sheet. The SOP is pending on approval from management for further implementation.

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: Mammut regularly collects existing audit reports of other organizations, like BSCI, Sumations, Elevate or other FWF brands who have their own audit system.

The brand could show evidence of quality assessment of the collected audit reports and its CAP follow up.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	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.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Intermediate			3	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: Mammut sources 14% of its production from two Bangladeshi production locations. Both production locations have been audited by the Bangladesh Accord or the Bangladesh Alliance on Fire, Building and Electrical safety issues in 2018. Both production locations have some CAP issues still open or pending on verification. The brand is not a signatory to the Bangladesh Accord and therefore cannot receive full points on this indicator.

The Burmese factories (2% of production) have been audited and received training (WEP basic) by FWF. Mammut complies with the FWF Enhanced Monitoring Programme on Myanmar. In its social report, the brand publishes per labor standard what issues have been found in the factories and how Mammut is addressing this, including wage ladders. Like last year, Mammut has not taken measures to actively promote social dialogue in its production locations despite the fact that one of the factories has an active trade union.

Mammut keeps track of specific risks per country by analyzing the outcomes of audit reports and creating an overview of most common risks. Furthermore, the Corporate Responsibility department assesses each new country individually in relation to specific human rights risks before it starts sourcing from a country.

Recommendation: In terms of ensuring women's safety at work in the Bangladeshi and Indian context, 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 in supporting both employees and employers in setting up anti-harassment systems. The FWF local team could provide training and regular support to suppliers upon request.

For Vietnam, Mammut could consider supporting freedom of association by investigating trade union structure and request minutes of dialogue meetings or by facilitating the possibilities for an Advanced WEP module on communication.

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: Mammut shares several factories with other FWF-members. Mammut actively cooperates with those members to resolve issues, such as CAPs or complaints.

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. 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.	2	3	0

Comment: Mammut has production at 11 production locations in Latvia, Lithuania, Germany, Portugal, and Switzerland. The brand ensured that it received a signed FWF questionnaire and the FWF Code of Labour Practices was posted.

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

Comment: Mammut does not meet the tail end requirements. Therefore, the indicator is rated n/a.

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: Mammot does not sell garments from 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).	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.	Yes, and member has information of production locations	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.	1	1	0

Comment: Mammot has two licensees, who are both an FWF member. One member filled out the FWF questionnaire and informed Mammot of the production locations. Although the other member was not sent the FWF questionnaire, Mammot was informed about the production location.

MONITORING AND REMEDIATION

Possible Points: 31

Earned Points: 25

Additional comments on Monitoring and Remediation:

As a general observation, it became evident during the brand performance check that much of the evidence is not structurally stored or easy to trace back. FWF recommends Mammüt to do an annual document check to make sure that the required documentation and evidence is available in order to have proof of proper due diligence and show evidence of follow-up of activities with suppliers, such as audit and CAP follow-up, follow-up on complaints etc.

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	7	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	5	

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 Head of Vendor is responsible for addressing 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: Mammut regularly checks with suppliers whether the supplier posted the Worker Information Sheet by visiting the supplier or by asking for a picture. In some cases, Mammut asked for a picture which was not provided and therefore could also not be shown during the Brand Performance Check.

Recommendation: FWF strongly recommends Mammut to include photographic evidence of posted Worker Information Sheets (WIS) in their Standard Operating Procedures for factory visits.

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.	38%	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: In the last three years, Mammut invested in WEP Basic training modules. In total, 15 factories were trained to increase the awareness of management and workers on the FWF worker helpline.

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: In 2018, Mammut received seven complaints at six factories. Five of the complaints have been resolved to date. One complaint is still in remediation as it is awaiting verification by FWF with an upcoming audit before the complaint can be resolved. Due to a mistake in FWF's database, the other unresolved complaint was only brought to Mammut's attention until it was at a late stage of remediation. Mammut has followed up with the brands that were active on these complaints and supports where possible.

The brand was not able to show that it took preventive steps regarding the complaints.

Recommendation: FWF recommends Mammut to uncover the root causes of complaints and prevent them from recurring. When appropriate, the investigation includes incidents at other factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	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.	2	2	0

Comment: Mammut actively worked with other FWF members to resolve multiple complaints in 2018.

COMPLAINTS HANDLING

Possible Points: 17

Earned Points: 12

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: The staff of Mammut is well-informed about FWF membership. Mammut informs staff through:

- A quarterly employee newsletter
- Quarterly management information for staff
- An internal blog
- Special training for sales and distribution employees
- Special training for employees in the Purchasing, Quality Control, Product Development departments (at least once a year)

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: All staff in regular contact with suppliers are well aware of FWF membership requirements and briefed regularly. In addition, all staff in direct contact with suppliers receive training on social compliance, risks per country and how FWF supports to mitigate risks.

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.	Member does not use agents/contractors	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.	N/A	2	0

Comment: Mammut does not use contractors or agents. However, their main suppliers do act as contractors. Mammut is supported by them to actively underwrite the CoLP. They help out in the process of receiving questionnaires and assuring the WIS is posted in production locations.

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.	6%	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.	1	6	0

Comment: The brand has two factories in the Better Work Programme which also focuses on supporting transformative processes related to human rights.

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.	Active follow-up	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.	2	2	0

Comment: Mammüt was able to show that they share the report with the factories after a training program and follows up with factory management on issues that need to be taken up in combination with existing CAPs.

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 6

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: Mammut has a system in place to identify all production locations. Through the FWF questionnaire and FWF audits it is aware of subcontractors at suppliers. The brand has an open dialogue with factories about the use of subcontractors and asks the suppliers whether the listed subcontractors are used for the production of Mammut.

At the same time, it has a policy in place that does not allow for unannounced subcontracting. Despite the fact that contracts between Mammut and suppliers do not allow for subcontracting, Mammut sometimes only finds out at which (approved) production location production took place after the goods have been delivered. In 2017, the Japanese subsidiary was an important reason for unannounced subcontracting by Mammut. This practice has been stopped in 2018 as all orders made by the Japanese subsidiary are now made via the Head of Purchasing at headquarters in Switzerland.

Regular on-site visits of quality control staff during production limit the risk of unauthorized subcontracting. In 2018, Mammut's vendor, purchasing, quality control and technical departments have improved their collaboration and actively share findings and even do additional checks in case of doubt. For example, Mammut inspected one factory in 2018 where the production volume seemed too big for the respective factory.

In one FWF audit, it showed that the production location was using subcontractors. Mammut did not follow up to ensure that these subcontractors weren't used for Mammut's garment production.

Recommendation: FWF recommends Mammut to take additional efforts to ensure that the brand is always informed beforehand about the placement of production at production locations. Furthermore, the brand could also agree with its main suppliers that only a pre-selected number of production locations can be used for production.

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: All relevant staff has access to audit reports and CAPs. Purchasers, quality control staff and technicians that visit suppliers are regularly updated on CAP issues and instructed by the Head of Vendor. Staff members are actively involved in discussing CAP follow up. Relevant feedback of Mammut's staff is included in the CAP follow up system.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 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: All communication adheres to the FWF communication policy. Mammut communicates about FWF on its website, in its supply chain newsletter, product flyers, etc. As Mammut went from leader to the good category, the brand needs to change its communication on hangtags. In 2018/2019, the brand has changed its hangtags. These will be used for the current collections.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Supplier list is disclosed to the public.	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.	2	2	0

Comment: Mammut publishes the Brand Performance Check reports on its website. Furthermore, the brand published all its 2018 production locations in its social report. It is also transparent about most issues that are found at the suppliers. As of 2018, Mammut participated in the Fashion Transparency Index.

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	Complete and accurate report submitted to FWF AND published on member's website.	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.	2	2	-1

Comment: Mammut published the social report on its website.

TRANSPARENCY

Possible Points: 6

Earned Points: 6

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: Mammut evaluates steps taken in the context of FWF membership as part of regular internal discussions. Performance on monitoring and improving labor standards in the supply chain is measured and evaluated during quarterly Corporate Responsibility (CR) meetings that involve the CSR coordinators and top management. A yearly evaluation of FWF membership is made during the process of writing the work plan and receiving FWFs performance check report.

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.	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: In Mammut's 2018 performance check two requirements were registered:

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

1.4: Mammut needs to ensure that its human rights due diligence approach is integrated throughout the entire company. The selection of new suppliers should be done in the same manner by Mammut and its Japanese subsidiary.

Mammut ensured that both requirements were dealt with. Mammut assured that all new suppliers sign and return the questionnaire before orders are placed. Furthermore, the orders of the Japanese subsidiary are now regulated via Mammut headquarters and therefore taken along in Mammut's standard due diligence approach.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

Mammut recommends FWF to:

- Not only provide guidance on priority issues but also on what verification should look like;
- Provide contact details of the trade unionists or worker representatives;
- Provide the questionnaire in other languages, especially when it comes to subcontractors who can only speak the local language.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	24	47
Monitoring and Remediation	25	31
Complaints Handling	12	17
Training and Capacity Building	6	11
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	83	125

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

66

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

06-06-2019

Conducted by:

Jesse Bloemendaal

Interviews with:

Josef Lingg - COO

Adrian Huber - Head of Innovation and Corporate Responsibility

Adrian Margelist - Chief Creative Officer

Frank Trommer - Purchasing Manager Apparel

Peter Hollenstein - Corporate Responsibility Manager

Michael Farnsworth - Head of Vendor Control

Barbara Kuschel - Head of Quality Control

Erich Felbabel - Head of Purchasing, Footwear & Hardware