



BRAND PERFORMANCE CHECK

Mayerline NV

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this report covers the evaluation period 01-02-2018 to 31-01-2019

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

Mayerline NV

Evaluation Period: 01-02-2018 to 31-01-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Brussel, Belgium
Member since:	15-03-2010
Product types:	Fashion
Production in countries where FWF is active:	China, India, Tunisia, Turkey
Production in other countries:	Italy, Latvia, Lithuania, Portugal, Russia
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	82%
Benchmarking score	47
Category	Needs improvement

Summary:

Mayerline has shown insufficient progress in performance indicators. The brand received a total benchmarking score of 47, which is below the minimum score needed for a 'Good' rating. Its monitoring percentage is 82%, which is just over the required monitoring threshold.

Mayerline had to invest a lot of time in 2018 in laying the foundations for its work with FWF. The brand developed an onboarding process for new suppliers in which due diligence is integrated from the start. While these procedures are now in place, for 2018 there is still a disconnect with what Mayerline could show that had been done for locations added in 2017 and 2018.

Mayerline needs to look closer at country-specific risks that may occur in its supply chain. It is not sufficient to request existing audit reports for suppliers located in Prato and Lombardia in Italy, or Turkey, without follow up. High risk locations need to be visited. This is also helpful in checking on potential unauthorised subcontracting. Where CAP issues have been identified in existing audit reports, the member needs to follow up on them.

FWF also expects members to take steps towards implementing living wages. Mayerline is strongly encouraged to check if its prices are able to cover the legal minimum wage, especially after an increase in wages. The next step for Mayerline is to select suppliers with which it has a close relationship to work on open costing and define the gap between wages paid and living wage benchmarks. The brand then needs to implement measures to close this gap.

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.	72%	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: 72% Of Mayerlines production volume comes from production locations where it buys at least 10% of production capacity. 45% Of the total production volume is placed in low risk countries.

Mayerline is in the process of consolidating its supply chain, this is not yet explicitly formulated in a sourcing strategy though.

Mayerlines financial year that is assessed runs from February 2018 to end of January 2019.

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.	14%	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.	2	4	0

Comment: Only 14% of the production volume comes from locations where Mayerline buys less than 2% of its total FOB. Most of the production locations with low leverage are accessory suppliers.

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.	42%	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: Mayerline prefers to work in longterm relationships, as it takes time to reach optimal quality. It has a steady and long term relationship with suppliers that takes up 54% of its production volume.

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

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.	No	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.	0	2	0

Comment: From the 14 locations added in 2017 and 2018, Mayerline could show a signed questionnaire for four suppliers. With ten suppliers Mayerline is not continuing and therefore did not put effort into collecting the questionnaires.

Requirement: Mayerline needs to ensure that new production locations sign and return the questionnaire before first orders are placed.

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: Mayerline conducts risk assessments for potential new sourcing countries. It's important to Mayerline to check the risks in the garment supply chain before it engages with a supplier in that country. This exercise is meant to assess which risks can be expected and whether Mayerline would be able to manage these. For countries where FWF is active, the country study provides the most information. If that is not available, the member uses the Risk Checker of MVOPlatform. If the member concludes it won't be able to manage, the conclusion is that no production will be started in that country. For this reason, Myanmar, Ethiopia, and Uzbekistan have fallen of Mayerline's radar.

The decision of on-boarding a new supplier is a joint responsibility of the Head of Product and the CSR Manager. The Head of Product takes the lead in the decision about whether onboarding a new supplier is necessary and acceptable, based on production necessities.

After the Head of Product has expressed its' desire to add a new factory, the case is handed over to the CSR Manager who needs to give a final go.

A new supplier will only be accepted when 1. There is a clear need to add a new production location. 2. The factory information sheet is completed. This includes the production processes that are being done in-house. 3. The management of the new factory has signed the FWF Code of Labour Practices. 4. The Worker Information Sheet is posted on the work floor. 5. A recent audit report and CAP are requested, and Mayerline assesses the state of progress. 6. When special risks are applicable, Mayerline asks the supplier to sign a letter of guarantee, which is a way to make suppliers aware of these risks. For example regarding the Sumangali Scheme in India. 7. The supplier has disclosed information about Tier 2 suppliers and these suppliers have signed the FWF CoLP and posted the Worker Information Sheet.

While on paper this process looks diligent, in 2017 and 2018 some suppliers have been added where this process has stalled or not been followed thoroughly. There are suppliers active for the previous year who have yet to return a signed questionnaire and post the Worker Information Sheet.

Recommendation: FWF recommends to include the total available capacity in the factory information sheet to get further indications whether outsourcing may be needed. FWF further recommends that locations in countries or regions where unauthorized subcontracting is a high risk are visited.

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: Mayerline has a supplier rating system that evaluates all audit reports by all labour standards and gives every supplier a rating colour. It is a visual system that shows the CSR-performance of a factory at a glance. Suppliers are informed about their score. The evaluation has not led to production decisions yet. Mayerline does not see many opportunities to reward suppliers who perform well, as quality and other criteria are leading to the placement of orders. Mayerline started developing a vendor-rating-system where CSR, buying, and quality criteria are integrated.

Recommendation: Mayerline is encouraged to integrate social compliance in the supplier rating system in which quality, relationship, and communication are assessed is one system. CSR should be weighted equally to other criteria. While it is important to look at the different labour standards when evaluating CoLP compliance, the commitment to cooperate and resolve issues should at least be equally important.

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: Mayerline knows the capacity of its suppliers, and together with them discusses when orders need to be placed to be able to get to a certain delivery date. Throughout the production process they get weekly updates from suppliers. Mayerline preorders fabrics, and therefore fabric delays can be mostly prevented. In case when fabrics or trims are late, Mayerline is informed and will try to find a solution, including extending lead time.

The process that leads up to a confirmed sample can often take much time and would be a factor that squeezes production time. Therefore lead time for Mayerline only starts after sample confirmation. It does occasionally occur that designs need to be slightly changed after sample confirmation, and Mayerline will discuss with the supplier if this is feasible within the given lead time, or look for solutions. Mayerline has some NOSstyles that can be used by suppliers to smoothen out production throughout the year.

Recommendation: FWF recommends Mayerline to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	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.	N/A	6	0

Comment: One audit has been conducted in 2018 but as the report was only shared late January 2019, follow up from Mayerline can only be assessed in the 2020 performance check.

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: Mayerline works with CMT and therefore can differentiate between material costs and the rest; overhead, labour costs, profit margin. Further differentiation is not available, and there are no suppliers with whom Mayerline works based on open costing.

Prices quoted by suppliers are accepted, and via the audit reports the member checks whether Legal Minimum Wage is paid.

Mayerline does not like to work with requesting price discounts when there are problems such as late delivery or quality deviations and accepts the same price for repeat orders.

Recommendation: After a legal minimum wage increase, FWF recommends the member to check actively that prices reflect the new legal minimum wage. FWF recommends Mayerline to expand their knowledge of cost break downs of all 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.

The first priority would be to make sure this level of transparency can be achieved with their suppliers, starting with suppliers where Mayerline has some leverage.

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.	No problems reported/no audits	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.	N/A	0	-2

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.	Insufficient	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	6	0

Comment: Mayerline's production is based on a very high-quality delivery standard, meaning on average Mayerline is paying relatively higher prices. The member has neither assessed nor responded to root causes for wages that are lower than living wages in production locations. Suppliers are hesitant to share details on what they are paying to workers.

Requirement: Mayerline must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. The member is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

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	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: Mayerline has not determined and financed wage increases yet.

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

Recommendation: To support companies in analysing 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.

We advise companies to avoid the concept of a one-time charitable contribution. FWF strongly recommends members to integrate the financing of wage increases it in its own systems, herewith committing to a long term process that leads to sustainable implementation of living wages.

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	9%	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.	1	3	0

Comment: Even though Mayerline is not actively working on living wages, the audit of December 2018 at one of their Chinese suppliers found that 12% of the wage samples that were looked into show that these workers are being paid the Asia Floor Wage or more. The Asia Floor Wage is one of the highest living wage benchmarks. These workers are from the knitting/weaving units or are special functions operators. This supplier is good for 9% of Mayerlines total production volume. Mayerline buys 10% of the total production volume of the supplier.

Recommendation: We encourage the member to show that discussions and plans for wage increases have resulted in the payment of a target wage, and start discussing with the supplier how the wages of other workers can be increased to a living wage benchmark.

PURCHASING PRACTICES

Possible Points: 41

Earned Points: 15

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	24%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	33%	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	for those production locations eligible for 'tail-end monitoring' the following steps must be taken: all factories must be visited at least once every three years. During visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented and the FWF health and safety checklist must be completed.	
Total of own production under monitoring	82%	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 CSR manager is the end responsible and gets informed by the Lithuanian and Chinese Quality Control 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.	No Corrective Action Plans were active during the previous year	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.	N/A	2	-1

Comment: One audit has been conducted in 2018 but as the report was only shared late January 2019 follow up from Mayerline can only be assessed in the 2020 performance check.

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.	No Caps Active	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.	N/A	8	-2

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.	78%	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: 78% of Mayerline's production volume comes from production locations that have been visited by the member in the past year. Mayerline's QC staff in Lithuania and China visit all the suppliers in their country. The Chinese staff debriefs the CSR Manager when something is wrong.

Recommendation: FWF recommends Mayerline to agree with Lithuanian and Chinese QC to share regular debriefs, even if there have been no serious findings during the visits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0

Comment: For six production locations in India, China and Turkey external audit reports were collected. One audit report dates from March 2019 but is included as Mayerline did not want to work with an outdated report. Mayerline could show that it assessed the quality of the reports and has started to begin addressing CAP issues.

Recommendation: If existing audit reports do not include details about the wages paid to workers, FWF recommends Mayerline to request this additional information. In case of existing audit reports being very positive compared to what can be expected, Mayerline is urged to check if the location of the audited facility is a sewing facility. In case of doubt, FWF recommends Mayerline to organize a FWF audit.

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.	1	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	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

Comment: Mayerline sources jeans only from their Tunisian supplier that has been audited by FWF in the past. The Head of Products has worked with this facility for over 20 years. Mayerline has a policy that sandblasting is forbidden, which is part of the quality manual that suppliers receive. Alternative methods that are used are chemicals and sandpaper. Mayerline checks that PPEs are used and the processes are taking place in open and well-ventilated spaces.

Mayerline sources from one Turkish supplier since 2015 and this supplier accounts for one-tenth of Mayerlines total production volume. The supplier was sent information about the FWF Turkey policy regarding Syrian workers, and the Head of Production discussed this with the supplier. The member has requested an existing audit report for this location but this report did not include any CAP issues. Mayerline, therefore, suspects the audited location may not have been the stitching unit, but has not followed up yet. Mayerline has not visited the supplier yet to check on the locations for stitching and identify if all production processes can actually be delivered by the factory.

China is good for 39% of Mayerlines total production volume. Specific risks to sourcing in China are excessive overtime and limited Freedom of Association. The member has not taken special efforts to look into these issues and mitigate where needed.

In India, where Mayerline sources from three suppliers producing accessories, gender-based violence and sumangali are specific risks. The member sent information to suppliers about the risk of sumangali, but the suppliers are not located in Tamil Nadu. As Mayerline is a very small customer it is difficult to get the suppliers to enroll in A FWF WEP focusing on anti-harassment.

In Tunisia, one of the risks that members may be confronted with is short term contracting. An overall risk for the textile industry is gender discrimination and violence against women. Mayerline has not taken action to identify these risks for its supply chain, or put in efforts to mitigate them.

Requirement: FWF members should schedule visits to Turkish suppliers and their known subcontractors at least annually and check if all production processes can actually be delivered at the known locations. The member's monitoring system should identify and address high risk issues that are specific to the member's sourcing practices. FWF provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies.

Recommendation: To ensure that unauthorized subcontracting is not taking place at the Turkish supplier, the member needs to put in more efforts than sending the Turkey guidance document. When an existing audit report does not include any violations, in a country where it occurs that audited locations are offices and not stitching facilities, the member is recommended to arrange a FWF audit for that location.

In China, Mayerline is recommended to discuss with suppliers how they may contribute to excessive overtime, and how this can be mitigated. WEPs can be organized to make workers aware of the complaints hotline. Even when Mayerline has only small leverage at their Indian suppliers, the member can discuss gender discrimination with them. Mayerline can look into the functioning of the anti-harassment committees at their Indian suppliers.

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.	No CAPs active, no shared production locations or refusal of other company to cooperate	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.	N/A	2	-1

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: In total 73% of the low risk volume is monitored. 45% Of the total production volume is placed in low risk countries, spread over 15 suppliers. Six suppliers have not returned a signed questionnaire, and nine have not posted the worker information sheet.

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

- Ensure up to date information on the labour conditions in the location either by a regular visit and/or a report by a third party;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

Recommendation: If the pictures of a posted Worker Information Sheet are zoomed in too closely it is unclear whether it is posted in a place accessible for workers. FWF recommends the member to ensure that pictures show more of the surroundings.

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: 18

Earned Points: 11

3. COMPLAINTS HANDLING

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

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

Comment: Mayerline has a designated staff member that follows-up and addresses 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.	No	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: Pictures of a posted Worker Information Sheet could not be shown for all new production locations. For the locations that will remain active for Mayerline in 2019, all WiS are posted.

Requirement: The member must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers. Member company should check by means of a visit whether the Worker Information Sheet is posted in the factories.

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.	9%	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 2016 one Chinese supplier was enrolled in the FWF WEP training, raising awareness among workers and management on the FWF CoLP and complaints helpline.

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. The member 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	No complaints received	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.	N/A	6	-2

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: 9

Earned Points: 3

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 CSR Manager has meetings with Lithuanian and Chinese QC and with CEO and Head of Products. While staff knows about FWF membership, Mayerline recognizes that knowledge can be enhanced and aims to organize training for all staff, conducted by the CSR manager, in 2019.

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: The Lithuanian and Chinese QC and Head of Products are informed by the CSR manager, and procedures are written down.

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

Comment: Mayerline stopped with the agent in Turkey and now sources directly from the supplier. There is one agent for China for outerwear products, who is informed about FWF's CoLP. It could not be demonstrated yet how the agent supports with CoLP compliance.

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.	0%	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.	0	6	0

Comment: Suppliers have not been enrolled in training that supports transformative processes.

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

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 4

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: Mayerline talks with suppliers to get to know if there are subcontractors. They check on the production processes that are available in the factory when they visit, and check with the audit reports. Mayerline is aware that audit reports in Turkey may only have audited the office and cutting section, and not the actual stitching or ironing and will have a closer look at that in 2019. Once Mayerline has information about the subcontractors, the member requests a signed questionnaire and to have the WIS posted.

In Lithuania, Mayerline works with a supplier platform who distributes orders between different production locations, but they can only use production locations that have been approved by Mayerline.

Mayerline had mistakenly not entered any subcontractors in the database for this financial year, while they know the subcontractors used in Lithuania and Tunisia. This has been fixed during the performance check.

Requirement: After the end of each financial year, members must confirm their list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production.

Non-CMT production location should also be included in the database. With fob figures for production locations where the member has a direct relationship (direct exchange of goods for money or direct communications). If there is no direct relationship, no fob figures need to be included but the member should select that the location is active.

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: Top management is updated when there are severe problems. The CSR manager has monthly meetings with the Head of Production and has had regular calls with QC staff in Lithuania and China to inform them about all steps they need to take to monitor production locations.

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

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: Before the member was is Suspended, it published the brand performance check, and aims to do so again with this check.

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: A social report was submitted to FWF but because of Suspended status could not yet be published online. This will be done as soon as this performance check, which gives the member a Good rating, is online.

TRANSPARENCY

Possible Points: 6

Earned Points: 5

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: The CSR manager has a quarterly meeting with the mother company on CSR performance of Mayerline. In these meetings, the vision for the direction of CSR is discussed. The outcome of these meetings is to continue the sustainability activities and deepen the efforts. Meetings with the CEO have mostly been focused on how to improve procedures.

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

Comment: Because of the suspension status, there was no performance check conducted last year.

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

The company would like to receive more guidance on how to improve on different labour rights.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	15	41
Monitoring and Remediation	11	18
Complaints Handling	3	9
Training and Capacity Building	4	11
Information Management	4	7
Transparency	5	6
Evaluation	2	2
Totals:	44	94

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

47

PERFORMANCE BENCHMARKING CATEGORY

Needs improvement

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

15-05-2019

Conducted by:

Niki Janssen

Interviews with:

Valerie Geluykens - CSR Manager

Isabel De Rocker - Head of Products

Lolita Kitkauskiene - Production Manager

Mimi Lamote- CEO