



Brand Performance Check

MANROOF GmbH

This report covers the evaluation period 01-01-2019 to 31-12-2019

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) 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. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear'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 Fair Wear 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 Fair Wear 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 Fair Wear'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

MANROOF GmbH

Evaluation Period: 01-01-2019 to 31-12-2019

Member company information	
Headquarters:	Zürich , Switzerland
Member since:	2008-01-01
Product types:	Promotional wear and accessories;Bags
Production in countries where Fair Wear is active:	Bulgaria, China, India, Turkey
Production in other countries:	Austria, Germany, Italy, Poland, Portugal, Slovenia, Switzerland
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	81%
Benchmarking score	65
Category	Good

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks evaluating the year 2019 in order to maintain fair and comparable data.

Fair Wear's performance checks review the progress that was made in the previous financial year. In this case, the 2019 financial year. Thus, this report does not cover the member's response to COVID-19, which will be monitored during the year and evaluated in the next performance check.

Summary:

Manroof has met most of Fair Wear's performance requirements. The brand monitored 82% of its total purchasing volume, which is above the 80% required by members after three years of membership. The benchmarking score of 60 places Manroof in the 'Good' category.

Manroof has a wide range of suppliers to manufacture its many different product categories and made use of more factories in 2019 compared to the previous year. The production volume at Manroof's biggest supplier decreased and so did the volume at the biggest suppliers, from which Manroof buys at least 10% of its order volume.

In 2019, Manroof took significant steps towards paying living wages at its biggest supplier in China. An agreement was made in which Manroof's share of the gap between the estimated living wage and the paid wages was bridged 50/50 between the supplier and the brand. This resulted in a salary increase for workers.

Manroof employed two external consultants in the past year, working with consultants in China, Turkey and India.

Manroof improved its due diligence procedures by creating a map that lists the labour violation risks per country. In addition, an evaluation of suppliers' compliance with the Fair Wear Code of Labour Practices was created for suppliers in China. A similar evaluation is yet to be created for India and Turkey.

In China, Manroof's consultant is conducting awareness training about the Code of Labour Practices and complaint helpline on a regular basis.

Manroof is expected to continue developing its production country due diligence process and develop an evaluation method to assess how suppliers in all countries (except low risk) are complying with the Code of Labour Practices. Also, Fair Wear expects the monitoring requirements for tail-end production locations to be met

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 Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear 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.	66%	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: Manroof has one key supplier located in China that is responsible for 56% of its total production volume. At four suppliers Manroof buys at least 10% of the suppliers' production capacity, making up 66% of Manroof's total production volume.

Manroof has describe the process of consolidation in their sourcing strategy that is agreed upon with top management/sourcing staff.

Recommendation: Fair Wear recommends Manroof to continue consolidating its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions.

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: 14% of Manroof's production volume comes from locations where it buys less than 2% of its total FOB. This is the case for 21 out of 31 of Manroofs active suppliers.

Manroof produces a wide range of products in order to be able to offer a full package to its customers. As the products are very different, Manroof needs different suppliers for each product. Manroof is aware that a relatively long tail-end is not ideal as this increases its administrative burden but does not see a way to decrease the number of suppliers. Manroof does aim to keep the current number of suppliers, and this aim is explicitly formulated in the companies written sourcing strategy.

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.	78%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: Manroof has a long term relationship with 15 out of its 31 active suppliers that take up 78% of its production volume. As the type of products Manroof produces does not change much over time, there is no need to start working with new suppliers unless existing suppliers do not show enough progress on CoLP implementation. Manroof prefers to work in long-term business relationships, as it takes time to build the trust needed to work together with suppliers on implementing the CoLP. This aim to maintain long-term relationships with suppliers is explicitly included in the companies written sourcing strategy

Recommendation: 5

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: For all new production locations that were added in 2019 Manroof has received back the signed questionnaire with the Code of Labour Practices. For two existing suppliers (one in Austria and one in Switzerland) the questionnaire is still missing. Manroof has very little leverage at these two suppliers and after repeated attempts have they have been unable to obtain the questionnaires. The same situation exists at 3 non-CMT subcontractors where Manroof despite multiple attempts has not been able to obtain the questionnaires.

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: Manroof has developed a risk map for all specific sourcing countries outside the EU and one generally for EU countries. The risk map scores the countries from 1-10 in their compliance with the CoLP and outlines specific country risks according to FW-country studies and the past experience of Manroof.

For new production locations in high risks countries, Manroof prefers to select suppliers that already have been audited e.g. by BSCI or that are certified by Fairtrade, GOTS, or SA8000. These audits and certifications give Manroof a general impression of the social compliance of a factory. Furthermore, Manroof learned that it helps to make progress on the CoLP implementation with a supplier when the supplier is already somewhat familiar with social audits. As part of the selection process of new suppliers, Manroof requests basic supplier information like the number of workers, production processes and other clients. Once production volume increases at a new supplier, Manroof visits the supplier and once the production volume reaches above 50.000 Euro Manroof request a social audit

The CEO has the final say regarding sourcing decisions. These decisions are influenced by the potential compliance of new suppliers with the CoLP.

Most of Manroof's production takes place in China and Europe. Europe is preferred as working conditions are relatively good and China is seen as the second best options as it is more industrialised and the risk of social non-compliance is lower than in most other Asian countries. In order to be able to meet short delivery times via sea freight, Manroof also produces a small portion of its production volume in Turkey. Some production takes place in India to ensure stable delivery dates during Chinese New Year and enough Fairtrade certified production.

Manroof used the FW country studies and the Italy risk assessment to identify country-specific risks. During the Brand Performance Check, Manroof demonstrated to be aware of most country-specific risks in China, India, and Italy. This information is shared among relevant staff verbally, in an informal way. Manroof buys a small part of its production from suppliers in Portugal and Turkey (0.3% and 0.4% respectively). Manroof has not looked into the country-specific risks for these countries yet. The production in Portugal started in 2002 and Manroof visited the production location. According to Manroof the risks of labour rights violations are limited at this supplier as the production entails relatively little manual work.

Recommendation: FWF recommends Manroof to expand on their production country-specific risk mapping, to make a more detailed segmentation of Europe and to include the total available capacity of suppliers in the evaluation process. Fair Wear also recommends Manroof to start making use of the "Factory Guide" in the process working with suppliers and emerging them in the Fair Wear processes.

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: Manroof has partially fulfilled the requirement from 2019 and a systematic approach to integrate social compliance into normal business processes and supports good decision-making for Chinese suppliers making up for 76% of its total FOB.

For suppliers in India (and Turkey) a similar systematic approach has not yet been developed. Also the systematic evaluation approach is weakened by the fact that Manroof did not share the evaluation with their suppliers.

The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

Recommendation: FW recommends Manroof to share and discuss the outcome of the supplier evaluation with all its suppliers and to give suppliers a possibility to evaluate Manroof as a customer as a part of the process to further strengthen the relationship and receive valuable feedback. FW also encourages Manroof to set up a supplier evaluation system for suppliers outside of China.

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: Manroof decides on lead times together with its suppliers. Lead times are usually 4 to 6 weeks. Manroof keeps two of its basic products in stock at the headquarter, allowing these products can be delivered straight away. Manroof knows roughly the number of minutes needed to produce its different products. It tries to place stable order by placing as large orders as possible at its main suppliers and place reorders at the same supplier when possible. As Manroof produces promotional articles, the orders it receives from its clients are not stable. Clients want something different every year and Manroof has no influence on this. To deal with this uncertainty, Manroof is hoping to set up a partnership with a relatively large client and receive stable, long-term orders from that client.

Manroof asks its clients to place orders as soon as possible to avoid creating pressure on its suppliers and sees it as its responsibility to work with its clients in order to avoid last minute changes in design that could affect the lead times. Furthermore, it informs its clients that changes after the confirmation of the order will result in longer lead times. When unforeseeable delays in production happen, Manroof tries to find a solution by discussing the problem with its client. Sometimes this results in train- or airfreight or later delivery dates. The costs of these kinds of solutions are covered by Manroof and sometimes partly by its suppliers.

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: Manroof is aware of the fact that excessive overtime does occur at its suppliers. Due to its small leverage at most of its suppliers, its influence on the working hours at its suppliers is limited. Specific audit findings (2 x Fair Wear audits and 2 external audits) showed findings over excessive overtime at 4 of Manroofs Chinese suppliers.

The explanation has previously been that suppliers do not have appropriate planning systems and accept last-minute orders from other customers, resulting in excessive overtime. With its main suppliers, Manroof discussed the issue and stressed that excessive overtime is not acceptable. Until now this only resulted in short term improvements, but no structural changes at the supplier.

Recommendation: FW recommends Manroof to keep discussing the excessive overtime issue with its suppliers, but since this has already been done repeatedly, without noticeable results, FW even more recommends collaborating with other customers at the factory to increase leverage when trying to mitigate excessive overtime hours.

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: In order to be able to compare prices, Manroof sends order requests to several suppliers. When the clients' target price is lower than the price Manroof receives from its supplier, the supplier sometimes uses cheaper materials to be able to offer a lower price. Sample orders are usually free for Manroof but it pays for transportation. In case Manroof does not agree with the quality delivered by its suppliers, it asks for price discounts.

Manroof works with one agent and does not have an agreement with this agent that ensures that the agent pays prices that allow payment of at least the legal minimum wage at the suppliers.

Manroof's two main suppliers disclosed wage data to Manroof. Based on this data, Manroof calculated that on average 25% of the price is used by the supplier to cover for the labour costs. Manroof knows roughly how many minutes are needed to produce its different products, but has not calculated the labour minute costs yet.

Recommendation: FW recommends Manroof to expand its 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. Furthermore, Manroof is encouraged to provide its agent with training on cost breakdown.

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

Comment: No evidence of late payments found in any of the FWF audits conducted in 2019.

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: Manroof is addressing the issue of living wage at at least two of its suppliers

Recommendation: FW advises Manroof to continue its assessment of the root causes for wages below living wage benchmark.

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.	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.	2	6	0

Comment: At Manroofs biggest supplier in China significant steps have been taken towards paying living wages (or the companies share there of) by calculating the gap between what workers were making and the wage estimated by the Anker Methodology and adjusted to Manroofs share of the production in the factory it was agreed that Manroof would pay 50% of the gap and that the factory would pay the other 50 % which amounts to workers getting 2,5 % additional salary. At another supplier in China living wages are already paid. In one factory in India it is estimated that 2/3 of the workers are earning living wages. At the remaining suppliers of Manroof the leverage is either too small or the business relationship too brief or the order volumes too unstable to start serious efforts to implement living wages. The Anker Methodology gives an estimate wage of 4,000 RMB per month which is 882 RMB lower than the estimate using Asian Floor Wage.

Recommendation: FWF advises Manroof to continue the efforts of pushing towards living wages and eventually take on the full share of the cost of the gap at their biggest Chinese suppliers and keep consolidating and building long-term relationships with suppliers to make the living wage efforts feasible at more of the suppliers.

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.	66%	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.	4	6	0

Comment: Manroof has made significant progress financing target wages at key suppliers. At Manroofs biggest supplier in China where more than 50% of the brands total FOB is being purchased, Manroof is paying 50% of the wage gap up to living wage while in another factory in China. At another Chinese supplier where Manroof buys 6% of its total FOB workers are receiving living wages already. In India one supplier is paying living wages to approximately 2/3 of their employees and are paying close to living wage to the remaining 1/3. From this supplier Manroof is purchasing around 5% of the brands total FOB.

Recommendation: Manroof is expected to continue to contribute to higher wages at its suppliers.

Purchasing Practices

Possible Points: 52

Earned Points: 33

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.		
% of production volume where approved external audits took place.		
% of production volume where Fair Wear audits took place.	71%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	10%	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.)
% of production volume where an audit took place.	71%	
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	All tail-end suppliers must be visited by Manroof's staff at least once every three years. During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the FW health and safety check-list must be completed and filed for FW to assess during a Brand Performance Check.	
Total monitoring threshold:	81%	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: In 2019 Manroof is working with external CSR consultants for China, India and Turkey. These consultants work on the follow up on problems identified by the monitoring system. For the suppliers in other countries, Manroof's CEO is responsible for this follow up.

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: Audit reports and Corrective Action Plan (CAP) findings are shared on time with factory management. Manroof divide the CAP findings into relatively easy issues and more difficult issues in terms of follow up. For the relatively easy issues deadlines are set with the supplier. No worker representatives are active at the audited factories

Recommendation: Before an audit takes place, Manroof is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

Comment: Manroof's external CSR consultants are responsible for monitoring the follow up of CAPs in China, Turkey and India. They share proof of improvements with Manroof and update the CAP reports according to the remediation status of the different findings. Manroof stores the evidence (photos, emails, documents) on its server.

Recommendation: FW recommends that where applicable, Manroof document meaningful efforts to facilitate resolving similar problems in the rest of the supply chain.

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.	82%	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: In 2019, Manroof (representatives) visited suppliers responsible for 82 % of its production volume. During these visits working conditions were discussed. Manroof uses the FW checklist for supplier visits. Manroof were able to document the outcome of their visits in a well structured way.

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: Audit reports from BSCI, Amfori, GOTS, and SA8000 are collected by Manroof. The quality of the reports is assessed with FW's quality assessment tool, and the findings are used by Manroof to get a general impression about the working conditions at its suppliers.

Recommendation: FW recommends Manroof to systematically follow up on CAP findings and document improvements made on these findings

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

Comment: Manroof visited two Turkish suppliers in 2019. These suppliers were producing less than 1% of Manroofs total production volume. Manroof did however still not take any steps to mitigate risks related to Turkish garment factories employing Syrian refugees although this was set as a requirement from the previous Brand Performance Check.

Manroof is in general aware of the risks in production countries and has made a risk map where these risks are listed. The risk of Syrian refugees is included in Manroofs risk mapping of Turkey, but since Manroof failed to document that a written policy on this matter was shared with their Turkish suppliers in 2019 the scoring remains insufficient.

Requirement: FWF requires Manroof to formulate a policy on the employment of Syrian refugees in Turkey.

Recommendation: The member brand could schedule a Workplace Education Program (WEP) module on Syrian refugee workers at a Turkish supplier that employs Syrian refugee workers or that is located in an area where many Syrian refugees are working. WEP module on Syrian refugee workers is developed for management and for Turkish and Syrian workers. FW has established an Arabic-language version of its worker helpline and developed worker information sheets in Arabic, with contact information for the helpline. Member brand could distribute these cards to all suppliers and subcontractors during factory visits.

Furthermore, FW encourages Manroof to enroll its main Indian supplier in the Workplace Education Program on violence prevention.

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

Comment: No active CAPs to collaborate on

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.	0-49%	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.	1	3	0

Comment: Except for one supplier, Manroof collected the signed questionnaires and proof of the posted Worker Information Sheets for all its suppliers in low-risk countries. In the last three years, Manroof only visited its main low-risk supplier in Italy, accounting for 10% of its low-risk production volume.

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

For all production sites in low-risk countries must:

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

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: Manroof does not meet the monitoring requirements for all its tail-end production location (not all have been visited in the last three years), and therefore it cannot get points for this indicator

Recommendation: FWF recommends Manroof to meet the monitoring requirements for its tail-end production locations and visit these at least every 3 years

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.	Yes, and member has collected necessary information	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.	2	2	0

Comment: Manroof could show the signed questionnaires from all its external producers.

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).	4%	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.	1	3	0

Comment: Two of Manroof's external producers are FWF members, accounting for 4% of Manroofs external sales volume

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: 33

Earned Points: 22

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	2	
Number of worker complaints resolved since last check	2	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: Manroof's CEO is responsible to address worker complaints if there are any.

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: Manroof and its local consultant check during visits whether the Worker Information Sheets are posted at accessible locations at the suppliers. Manroof could show photos of posted Worker Information Sheets during the Brand Performance Check. However, some of the photos were that much zoomed in, that the location of the posted Sheets was not visible. For these Sheets, Manroof could not check whether these were posted at an accessible location.

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.	68%	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: Manroof did not do any WEP Basic trainings during 2019. The effort awareness raising efforts could be documented in 68% of Manroofs total production volume excluding low risk countries.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

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: Manroof collaborated with another Fair Wear Member on solving complaints in two of their Indian production facilities

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: FWF membership is discussed regularly in meetings with all staff. New employees are trained on FWF membership and requested to read the social report.

Recommendation: It is advised to develop a standard procedure for all new employees to get familiar with FWF membership. FWF has material available that can be used to inform (sales) staff.

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: Staff in direct contact with suppliers are informed about FWF requirements by emails, meetings, and documents on Manroof's server. As the team is relatively small, this is done in an ad-hoc, informal way.

Recommendation: FWF encourages purchasing staff or agents to observe factory audits by FWF audit teams to learn about the audit process and to be able to better follow up on corrective action plans.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	2	2	0

Comment: Manroof works with one agent in China. The agent is informed about FWF membership by sending the questionnaire with the CoLP. The agent sent pictures of the posted Worker Information Sheets at the suppliers to Manroof and plays an important role in CAP remediation.

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: No capacity building trainings to support transformative processes were done in 2019. In 2018 another FW member implemented the Workplace Education Program (WEP) on violence prevention at one of Manroof's Indian suppliers

Recommendation: Fair Wear recommends Manroof 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 behavioral change and long-term structures to improve working conditions. To this end, members can make use of Fair Wear's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. Fair Wear 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 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.	0	2	0

Comment: Manroof did not follow up actively on trainings the 2018 training mention in Indicator 4.4 and no further trainings were conducted in 2019

Recommendation: FW recommends Manroof to check whether its supplier conducts regular anti-harassment committee meetings, whether an external expert attends these meetings and whether complaints are reported to the committee. Manroof should also communicate to suppliers that reported incidents will not result in negative consequences (such as withdrawing orders) as long as the factory investigates and remediates them accordingly. Manroof could also check whether committee members and management are organizing awareness-raising activities about sexual harassment and whether re-elections of the committee and/or re-training are needed, e.g. due to worker turnover.

Training and Capacity Building

Possible Points: 13

Earned Points: 5

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: Manroof uses the FW questionnaires as well as asking for a list with name, address and product from all their suppliers to find out whether production is subcontracted or not and actively checks production facilities and capacity during on-site visits. The use of external CSR consultants in China, India and Turkey further helps Manroof keep track of their supplier base and this should help reduce the risk of unauthorized contracting.

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: For each supplier, Manroof stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails, in an informal way.

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: Manroof communicates about FWF at its website, brochures, and via social media.

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: Manroof published Brand Performance Check reports on its website.

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: Manroof has a made a comprehensive and strong social report that gives a good and accurate description of the companies CSR efforts of 2019. The social report is shared on Manroof's website.

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: FWF membership is evaluated by the CEO and other relevant staff. This is done in an informal, ad-hoc way. Supplier feedback is taken into account in these evaluations. The Brand Performance Check report is used to set priorities for the next year.

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.	70%	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: There were 10 requirements included in the last years Brand Performance Check Of these Manroof managed to successfully address 7. They did not manage to address the following 3 requirements:

Manroof did not visit all tail end suppliers minimum every third year

Supplier evaluation done for China but not done for suppliers in Turkey and India. Since 76% of the FOB is covered by Manroofs Chinese suppliers FW consider this partially improved

Syrian refugee policy not written or implemented with factories in Turkey.

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

All tail-end suppliers must be visited by Manroof's staff at least once every three years. During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the FWF health and safety check-list must be completed and filed for FWF to assess during a Brand Performance Check

Indicator 1.5: A systematic approach is required to integrate social compliance into normal business processes and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

Indicator 2.7: (Partially improved)formulating policies on the employment of Syrian refugees in Turkey is a necessary step. This policy should encourage the disclosure of unauthorized subcontractors. Manroof should schedule visits to Turkish suppliers and their known subcontractors at least on an annual basis. When conducting in-person visits, Manroof must notify its suppliers on their policies concerning Syrian migrant workers....

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

- Manroof would like to receive feedback on how other FW members are working without external consultants.
- Manroof would like FW to give extra points to brands that are employing external consultants locally in the production countries.
- Manroof would like to get information on the Asian Floor wage and Anker Methodology for living wages.
- A request to FW to be sharing more best practices on living wages.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	33	52
Monitoring and Remediation	22	33
Complaints Handling	12	17
Training and Capacity Building	5	13
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	87	134

Benchmarking Score (earned points divided by possible points)

65

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

12-05-2020

Conducted by:

Peter Jahns

Interviews with:

Jacques von Mandach, CEO