

## BRAND PERFORMANCE CHECK

# Odd Molly International AB

PUBLICATION DATE: JUNE 2015

this report covers the evaluation period 01-01-2014 to 31-12-2014

#### ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices. They evaluate the parts of affiliate 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 factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory 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 factory 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 affiliate 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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance</a> <a href="https://www.fairwear.org">Check Guide</a> provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

## Odd Molly International AB

Evaluation Period: 01-01-2014 to 31-12-2014

AFFILIATE INFORMATION	
Headquarters:	Stockholm, Sweden
Member since:	01-06-2009
Product types:	Fashion
Production in countries where FWF is active:	China, India
Production in other countries:	Italy, Morocco, Portugal
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	No
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	87%
Benchmarking score	59
Category	Good

#### Summary:

Odd Molly meets most of FWF's management system requirements. The company's sourcing strategy is based on long-term relationships and it works with a stable supplier base. Given that Odd Molly is in process of expanding their product range, several new suppliers were selected in India and Portugal. 20% of Odd Molly's 2014 purchasing volume comes from suppliers located in low risk countries. Together with the suppliers the company has audited the past years, it has reached a monitoring threshold of 87%.

This is just below the 90% required of brands in 3+ years of membership; however, FWF has awarded a good rating. In light of Odd Molly's confirmed plans to conduct audits and WEP trainings in 2015, together with the concrete agreements the affiliate made to systematically follow up on corrective actions with the buyers, FWF is confident the company will make important steps to ensure an effective monitoring system.

Due to lack of capacity, Odd Molly buyers were not sufficiently involved in following up after audits. The day after the performance check, FWF conducted a training for the buyers to enable them with more knowledge to support the implementation of the Code of Labour Practices. For that reason, FWF expects Odd Molly to have a better integrated structure in 2015 for remediating findings after an audit.

In the future, Odd Molly should investigate the root causes of excessive overtime in factories. Odd Molly also needs to develop a pricing policy where the company knows the labour cost of garments. Odd Molly is encouraged to continue enrolling suppliers in the Workplace Education Programme.

#### PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates 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 affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—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 affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates 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. Affiliates 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: Affiliates 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. Affiliates 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
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	33%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	2	4	0

Comment: Odd Molly has a stable supplier base with approximately 30 suppliers based on the products per season. The strategy is not to spread too much in order to be more present in each country, to be able to visit on a regular basis and to place stable orders for suppliers which leads to a stronger position at the factory. Simultaneously, Odd Molly aims not to buy more than 15% of the factory's production capacity in order not to be too dependent. There are a number of suppliers where leverage is low since these are suppliers that present a small percentage of the buying volume and are only used for specific product requests.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	46%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	2	4	0	
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Comment: Odd Molly values long term relationships; some factories have been producing Odd Molly products from the start of the company in 2002. 46% of the 2014 production volume comes from suppliers with a business relationship of at least five years.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before	Yes	The CoLP is the foundation of all work between factories and brands, and the first	Signed CoLPs are on file.	2	2	0
first orders are placed.		step in developing a commitment to improvements.				

Comment: Odd Molly has expanded its product range by adding home textiles, beachwear and rainwear. In order to produce these new product lines, Odd Molly selected several new suppliers in 2014 in India and Portugal. The new suppliers must sign the Code of Labour Practices before the bulk order is placed. Questionnaires are stored and reviewed on file. To date, Odd Molly has received questionnaires from all suppliers.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0	
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Recommendation: FWF recommends Odd Molly to further integrate its due diligence process throughout the buying department. Particularly given the new product groups and different types of suppliers that are needed to expand the product range. Odd Molly could work towards a more structured approached followed by all buyers. The assessment buyers conduct must be documented and discussed within in the team to ensure a systematic sourcing strategy that integrates working conditions.

Comment: Odd Molly has developed a checklist for buyers; the FWF Code of Labour Practices and the guidelines for health and safety are included in the checklist.

Part of the assessment is visiting the

factory, collecting existing audit reports and investigating which other clients source in that factory. This is all done during the sample period which Odd Molly also considers as a trial period for making sure the supplier is

willing to work on improving labour standards. An information package is discussed with suppliers that includes shipping information, contract terms, as well as the Code of Labour Practices and FWF membership. A maximum of one order can take place before a visit takes place. In some countries the company works through production agents who recommends suppliers to them and who do an initial assessment of social compliance.

1.5 Supplier 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.	2	0		
			etc.				

Recommendation: Odd Molly is encouraged to develop a documented evaluation/grading system for suppliers where compliance with labour standards is a criterion for future sourcing decisions; outcomes of audits, complaints and trainings can be included. This will allow the entire buying department to systematically weigh progress on working conditions in the company's buying practices. Especially for the new suppliers it is important to track progress.

Comment: Odd Molly is discussing the implementation of a new supplier data system which should enable the company to better monitor supplier performance. Up to now separate documents are used with a CSR column where audit information is included next to quality, price and delivery. Suppliers are evaluated in oral meetings within the buying department.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
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Comment: Odd Molly production lead-times vary between 12-20 weeks, depending on style, quality and quantity. Buyers of Odd Molly are aware of the capacity of the factory; particularly in case of knitting exact calculations of working hours are made. The company has adjusted its production cycle gradually in order to avoid placing orders on speculation. Odd Molly now has 4 selling seasons instead of two which means the company can place orders earlier for early deliveries. Odd Molly produces salesmen sample collections first, then take orders from retailers and then places order for production. Odd Molly cannot demonstrate this new production cycle has had impact on supporting reasonable working hours. However, it did lead to a number of benefits for the supplier in terms of production planning: 1) Sales is more involved at prototype meetings; as result suppliers receive order for the early delivery drops earlier. 2) This cycle helped to set longer lead times and to ease production pressure. Both the company as well as the supplier receive more time in between design and shipment of orders. 3) Given that the design stage is better organised, there are less changes for the supplier in the sample stage.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	3	6	0	
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Recommendation: FWF recommends Odd Molly to investigate the root causes of excessive overtime. As part of such an analysis all incidents of overtime, their origin and severity should be recorded during a period which is representative for an entire production season. After this analysis, a step-by-step plan could be drafted by the factory to bring the amount of working hours down

to legally allowed levels. As an outcome of assessing the root causes of excessive overtime, the plan should specify how the factory can control overtime hours and to what extent Odd Molly could support.

Comment: Despite Odd Molly efforts, excessive overtime still took place at most suppliers where FWF conducted an audit in 2014. Particularly in two factories China where workers did not receive one day off every 7 days. One of the audits in China showed the factory was not transparent in recording working hours.

To avoid production delays, Odd Molly tries to work on better forecasts, making accurate material bookings and by working on earlier prototype and sales meetings. Moreover, if products turn out not to be suitable for first delivery, the company has the possibility to move or replace it with other orders. Odd Molly also has a few carry-over styles. Air freight is possible as a last resort in case of delays.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0	
		the tabout costs of garments.	or country/city tevet.				

Requirement: Odd Molly needs to develop a pricing policy where the company knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries. The company must gain insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

**Recommendation**: It is recommended to use the wage ladder calculations in estimating the costs of every stage of the supply chain.

Comment: Odd Molly has initiated an experiment with one style to gain more insight into labour costs of every stage in the supply chain, but is experiencing it as very difficult given the transparency issues with suppliers.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, 2 CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	-2	
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Recommendation: In order to guarantee payment of minimum wages, factories need to be transparent in their wage and attendance records. Odd Molly is advised to keep stressing this point and working on increased transparency with these suppliers where there were unverifiable records.

Comment: Although there was no verifiable evidence of payments below minimum wage, one audit showed temporary workers were employed with no records and thus no verification of wages to those workers. Specifically with the piece rate system in China, wage records must show piece rate is sufficient to at least cover minimum wage and the correct payment of overtime hours.

1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories 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 factory and affiliate financial documents.	0	0	-1
1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0

Recommendation: FWF encourages Odd Molly to discuss with suppliers about possibilities to work towards higher living wage benchmarks. FWF has developed experience with approaches to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. In China most findings are about not paying overtime correctly; this could be a start to increase wages, although excessive overtime is not to be encouraged, it should be compensated with the correct premium.

Comment: Three out of the four audits conducted by FWF teams in 2014 showed payment below living wage for some departments.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	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 affiliate's score.	Supplier information provided by affiliate.	N/A	2	0

## PURCHASING PRACTICES

Possible Points: 40

Earned Points: 24

#### 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	67%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	20%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Total of own production under monitoring	87%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** Odd Molly buyers in close cooperation with the production manager are responsible for the follow up of CAPs. However, in 2014 the buyers did not have sufficient capacity to efficiently follow up on corrective actions.

existing Corrective Action Plans one affil	VF considers efforts to resolve CAPs to be e of the most important things that filiates can do towards improving working nditions.	Documentation of remediation and followup actions taken by affiliate.	4	8	-2
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Requirement: Resolving and remediating non-compliances is one of the most important criteria FWF affiliates can do towards improving working conditions. FWF expects affiliates to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs. The buyers of Odd Molly should be actively involved in following up of corrective actions. As an additional step, the feedback from factories must be verified by checking the status in the factory.

Comment: Progress on a few issues from a Corrective Action Plan were demonstrated by an audit to verify improvements at a supplier in India. The production manager discussed the status of findings with the suppliers. However, not all CAPs have been followed up systematically by Odd Molly's production department.

2.3 Percentage of production volume from	97%	Formal audits should be augmented by annual		4	4	0	
suppliers that have been visited by the		visits by affiliate staff or local representatives.	document all factory				ĺ
affiliate in the past financial year		They reinforce to factory managers that	visits with at least				
		affiliates are serious about implementing the	the date and name of				
		Code of Labour Practices.	the visitor.				

**Requirement**: As part of setting up the integrated approach of buyers to implement the Code of Labour Practices, part of their visit should include discussing labour standards and if applicable the status of a Corrective Action Plan.

Comment: Factories are visited at least twice a year by buyers. In addition, the production manager travels to specifically discuss CAPs.

2.4 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF affiliate	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.	N/A	3	0	
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Comment: Odd Molly checked for existing audit report, but found no reports available.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. 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	
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2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Different countries and products have different risks associated with them; monitoring systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0	
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Recommendation: FWF suggest to specifically look into its own buying practices where it has found excessive overtime taking place at Chinese suppliers. Regarding gender based violence, it is recommended to further enrol suppliers in FWF's Workplace Education Programme; a process Odd Molly is already initiating in 2015.

Comment: Odd Molly is aware of the risks in the countries it is producing in. Social security and excessive overtime remain the biggest challenges in China. Odd Molly has investigated the situation with homeworkers in Morocco with an external audit in 2012.

2.6a High risk issues specific to Bangladesh are identified and adressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0	
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2.6b High risk issues specific to Myanmar are identified and adressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: Odd Molly has been working with another FWF affiliate on the follow up an earlier shared audit.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	2	0
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Comment: Suppliers in Portugal and Italy are regularly visited; during these visits it is checked whether the CoLP is posted. Buying houses that Odd Molly works with also visit the factories frequently.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales	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	Questionnaires are on file.	N/A	3	0
volume)		or a similar organisation, and in which countries those brands produce goods.				

	2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	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	
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## MONITORING AND REMEDIATION

Possible Points: 26

Earned Points: 19

#### 3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	3	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	3	
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
3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0

Recommendation: FWF suggest Odd Molly buyers to systematically include checking whether the Code of Labour Practices is posted when visiting suppliers.

Comment: Odd Molly checks during visits whether the CoLP is posted. Some audits showed the CoLP was not posted. Odd Molly responded by means of requiring the factory to send a picture of the CoLP in the factory's workplace.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Factory participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme.	1	4	-2
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Recommendation: FWF encourages Odd Molly to ensure workers are better informed about the labour standards and the existence of the FWF helpline. Awareness can be raised by taking part in WEP trainings. In addition to sending the worker information sheet, affiliates can use the worker information cards available for download on FWF's website.

Comment: The majority showed workers interviewed during FWF audits were not aware of the Code of Labour Practices and the complaints system. One factory in India took part in FWF's Workplace Education Programme.

3.4 All complaints received from factory 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. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	3	6	-2	
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Requirement: Odd Molly is expected to follow up on the remediation steps of the two complaint cases that are ongoing. Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier, specifically acting on the remediation plan.

Comment: Odd Molly is no longer sourcing at one of the suppliers where an active complaints case is in process for another FWF affiliate. A complaint was submitted from a worker at a supplier in India regarding overtime, leave payment and the fact that workers do not receive a payslip. After active follow up by Odd Molly, the last point has been remediated; the first to points are still in process.

A third complaint case dealt with complex resignation issues, where the worker partly aims to resolve the issues with local court. Odd Molly has followed up by requiring the supplier to provide documents for evidence, but the investigation is still ongoing.

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	customers by the FWF affiliate can be critical	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	-2	
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#### **COMPLAINTS HANDLING**

Possible Points: 13

Earned Points: 7

#### 4. TRAINING AND CAPACITY BUILDING

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

Comment: Odd Molly has weekly meetings with the production department and design team. Status and outcomes of Corrective Action Plans are discussed during those meetings. Monthly meetings take place with the whole company where the general CSR issues are presented. Sales staff and in-shop staff are also aware of FWF membership requirements. The social report that is submitted to FWF is shared with the entire company. The company has internal mailings that occasionally include a FWF topic and new employees are trained on the FWF membership requirements.

equirements is provided to staff in direct contact with suppliers.	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.	0	2	0	
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Comment: Following the performance check in May 2015, FWF conducted a training for all buyers in the production department. However, in 2014 this was not yet the case.

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 affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	2	2	-2	
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Comment: Odd Molly actively informs the local production agents who help to follow up on the CAP's. Sales agents are informed through agent meetings. Before the selling of collection period, sales agents receive material that includes written information on CSR in addition to updates with audit results. One of Odd Molly's agents in Portugal attended the seminar that was organised by FWF in Portugal.

Education Programme (where WEP is offered; by production volume) related to labour standards is acommon issue relevant trainings; participation in and managers is a key step towards sustainable improvements. Programme.
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Recommendation: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. FWF encourages Odd Molly to further motivate its main supplier(s) to join WEP trainings; a process that is already ongoing.

Comment: One factory in India participated in FWF's Workplace Education Programme. That factory accounted for less than 1% of production volume of the countries where the Workplace Education Programme is offered. More trainings as part of this programme are scheduled in 2015.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	0	4	0	
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Recommendation: Manufacturers and their workers should be systematically informed about FWF and the implementation of the Code of Labour Practices. All factory management and workers should be informed and aware about the relevant labour standards and grievance mechanisms. FWF recommends Ofdd Molly to ensure the supplier in Morocco participate in a training given that this supplier accounts for 7% of Odd Molly's 2014 production volume. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

#### TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 3

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

**Recommendation**: Odd Molly is advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

Comment: Odd Molly is in process of identifying all production locations for subcontractors. All first-tier suppliers are known. A process is initiated to gather information on subcontractor level as well. An intern at Odd Molly has conducted a trial with one style produced in Portugal to gain insight into the whole supply chain, from finished product to raw material of all components in the garment. The trial is used as a baseline in the efforts to make the supply chain more transparent and also to start to analyse the prices.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	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	
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**Recommendation**: It is recommended to set up systemic procedures that are structurally integrated for all buyers in order to align sourcing decisions with CSR goals and objectives.

Comment: All buyers at Odd Molly are responsible for monitoring and remediating corrective action plan. Information on the status of working conditions are shared with the CSR manager who is also the product manager. However, buyers are not yet systematically involved in remediating corrective action plans.

Internal meetings are held to discuss the social report with production staff.

#### INFORMATION MANAGEMENT

Possible Points: 7
Earned Points: 4

#### 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.	1	1	-2

Requirement: NEW WEBSITE DOES NOT SAY ANYTHING ABOUT FWF!

Comment: Odd Molly communicates about FWF on its website and through their sales agents in own shops. Description of FWF is in correct wording. A new website is launched following a new communications strategy to expand the Odd Molly story-telling. As part of this process, a marketing staff person conducted factory visits to learn more about production and sustainability.

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

Comment: The brand performance

6.3 Social Report is submitted to FWF and is published on affiliate's website

Published on affiliate's website

The Social Report is an important tool for affiliate to transparently share their efforts with stakeholders.

Report adheres to FWF guidelines for Social Report content.

## **TRANSPARENCY**

Possible Points: 4

Earned Points: 4

#### 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

Recommendation: It is recommended to discuss the outcomes of this performance check with the production manager and buyers to further set priorities for this year.

**Comment:** Odd Molly evaluates FWF membership regularly. When writing the workplan, the company looks at its ambitions and goals again with staff from management and purchasing.

7.2 Changes from previous Brand Performance Check implemented by affiliate	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.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	-2
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Comment: The previous performance check listed to requirements: 1) develop a pricing policy where the company knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries and 2) Inform all factory manager and workers of the Code of Labour Practices. Odd Molly is still working on gaining more insight into the cost of labour in relation to their pricing policy. Secondly, it has made progress to increase awareness of the Code of Labour practices by enrolling more factories in WEP. In 2014, one training took place, but agreements are made on scheduling more trainings.

## **EVALUATION**

Possible Points: 6

Earned Points: 4

## RECOMMENDATIONS TO FWF

Odd Molly made several suggestions that the company would appreciate:

- more guidance on subcontractor requirements and information used in database.
- more material/brochures in Swedish.
- share more practices among brands to facilitate learnings among FWF membership base.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	24	40
Monitoring and Remediation	19	26
Complaints Handling	7	13
Training and Capacity Building	3	15
Information Management	4	7
Transparency	4	4
Evaluation	4	6
Totals:	65	111

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

59

#### PERFORMANCE BENCHMARKING CATEGORY

Good

#### BRAND PERFORMANCE CHECK DETAILS

#### Date of Brand Performance Check:

11-05-2015

Conducted by:

Annabel Meurs

#### Interviews with:

Anna Attemark (CEO)
Kristin Roos (Production Manager/FWF contact person)
Carola Nolte (buyer for knitwear)
Martina Jall (buyer for India)
Jenny Annerhult (marketing)

#### Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data.