



# Brand Performance Check

Maier Sports GmbH

August 2013

This report covers the evaluation period  
June 2011 to December 2012

## About the Brand Performance Check

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at multiple levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of the 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.

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.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via [www.fairwear.org](http://www.fairwear.org). The FWF Performance Benchmarking Guide provides more information about the indicators and is available for download.

## Brand Performance Check Details

Date of Brand Performance Check	31-Jan-13	
Conducted by:	Stefanie Santila Karl	
Interviews With:	Simone Mayer Anita Wolpert Sascha Kautschitsch	CEO (CSR) Technician, FWF contact person Marketing

## Scoring

Affiliate Benchmarking scores and Performance Benchmarking categories will be published starting in 2014. During 2013, FWF will be testing out the new system and evaluating the appropriate threshold levels for Benchmarking categories.

# Maier Sports GmbH (hereafter: Maier Sports)

## 2013 Brand Performance Check

Affiliate Information		
Headquarters:	Koengen	Germany
Member Since:	June	2011
Product Types:	Sportswear, Outdoor	
Production countries:	FWF Active Countries: China, India, Turkey Other countries: none	
Basic Requirements		
Workplan for this evaluation period was submitted?	Yes	Must be submitted before start of evaluation period
Projected supplier register for this evaluation was submitted?	Yes	Must be submitted before start of evaluation period
Actual supplier register for this evaluation period has been submitted?	Yes	Must be submitted after the end of the evaluation period.
Membership fee has been paid?	Yes	
All suppliers have been notified of FWF membership?	Yes	
Scoring Overview		
% of suppliers under monitoring	40%	
Summary	<p>Maier Sports meets FWF requirements for first year FWF membership. Maier Sports has high leverage due to own production sites, joint ventures with factories and subsidiary production sites. Production sites are frequently visited. Further action needs to be taken when it comes to the implementation of corrective actions of audit reports. A good step would be to enroll production sites in the FWF Workplace Education Programme. To enrich discussions and implementation at the production sites it is recommended to be more active with regard to sharing/updating information with other FWF affiliates.</p>	

## Purchasing Practices

Basic Measures		Comments
% of production in low-risk countries	0%	Countries with relatively low risk of labour violations as defined by FWF.

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity.</b>	90%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier register provided by affiliate.
<b>1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years.</b>	81%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier register provided by affiliate.
<b>1.3 Labour conditions are considered when selecting new suppliers.</b>	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
	Recommendation: To formalize the process on how Maier Sports checks labour conditions when considering a new supplier (e.g. checklist for evaluation of the social standards at the production site during the decision making process).		
<b>1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.</b>	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.

<p><b>1.5 Company conducts audits at all new suppliers before placing orders.</b></p>	<p>No</p>	<p>An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.</p>	<p>Audit documentation; must meet FWF audit quality standards.</p>
<p><b>1.6 Affiliate sources from an FWF factory member.</b></p>	<p>No</p>	<p>When possible, FWF encourages affiliates to source from FWF factory members. The small number of factories in the programme means sourcing from FWF factory members cannot be a requirement.</p>	<p>Supplier register provided by affiliate.</p>
<p>Recommendation: As Maier Sports has high leverage and also a share in almost all production sites (see 1.7) Maier Sports could discuss possibilities of their suppliers to join FWF as a factory member. Hence the supplier would take own responsibility in the implementation of social standards.</p>			
<p><b>1.7 Percentage of production volume from factories owned by the affiliate.</b></p>	<p>69%</p>	<p>Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.</p>	<p>Supplier register provided by affiliate.</p>
<p>Comment: Except of one production site, Maier Sports has a share at the factories they produce at. 69% is either a joint venture or a subsidiary company of Maier Sports.</p>			
<p><b>1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner.</b></p>	<p>No</p>	<p>A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.</p>	<p>Documentation of systemic approach: rating systems, checklists, databases, etc.</p>
<p>Comment: As Maier Sports has a share in almost all production sites, the company does not see added value in an evaluation of supplier compliance with the CoLP. Recommendation: To still find a way to reward compliance with the CoLP as an incentive for the supplier to work towards high compliance.</p>			
<p><b>1.9 The affiliate's production planning systems support reasonable working hours.</b></p>	<p>General System</p>	<p>Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.</p>	<p>Documentation of robust planning systems.</p>
<p>Comment: Maier Sports has a share in most of their production sites. As overtime payment is higher than regular payment, Maier Sports analyses overtime hours and tries to reduce them as much as possible.</p>			

<p><b>1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF.</b></p>	<p>50%</p>	<p>Excessive overtime is one of the most common labour rights violations in high-risk production countries. It is often caused by poor production planning by brands.</p>	<p>Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.</p>
<p>Comment: Two audits have been conducted by FWF during the reporting period. One production site did well with regard to working hours. At the other production site, FWF found excessive overtime. Requirement: The affiliate has to take adequate steps to ensure reasonable working hours at the production sites.</p>			
<p><b>1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime, if found.</b></p>	<p>No/Inadequate actions taken</p>	<p>Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.</p>	<p>Examples of root cause analyses and resulting changes in production planning/policy.</p>
<p>Comment: Maier Sports did not invest in root causes of excessive overtime if found. Recommendation: It is recommended to evaluate the difference between the production sites when it comes to overtime hours to find out how to ensure that working hours at all production sites are according to law.</p>			
<p><b>1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.</b></p>	<p>Affiliate can demonstrate a pricing policy based on country level data. Minimum wage levels are known by affiliate in all production countries.</p>	<p>The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.</p>	<p>Formal systems to calculate labour costs on per-product or country/city level.</p>
<p>Comment: Maier Sports makes its own calculation for each product and cross-checks the supplier information with this information. As Maier sports takes a decision on where to produce what style before final costs are fixed, changing the supplier because of the price is not possible. The price is either agreed to as suggested by the supplier or discussed considering country wages.</p>			
<p><b>1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages.</b></p>	<p>Not applicable</p>	<p>If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.</p>	<p>Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.</p>
<p>Comment: None of the audits showed evidence for the production sites to fail the payment of minimum wages.</p>			
<p><b>1.14 Evidence of late payments to suppliers by affiliate.</b></p>	<p>No</p>	<p>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.</p>	<p>Based on a complaint or audit report; review of factory and affiliate financial documents.</p>

<p><b>1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers.</b></p>	<p>No efforts shown.</p>	<p>Sustained progress towards living wages requires adjustments to affiliates' policies.</p>	<p>Wage ladders, correspondance with supplier, other relevant documentation.</p>
<p>Comment: Maier Sports did not assess root causes of wages lower than living wages with suppliers.                  Recommendation: It is recommended to use the wage ladder of the audit reports as a first step to discuss wages according to what is considered a living wage. Especially at the production sites which are owned by Maier Sports, the company and suppliers should find solutions to ensure a wage to live for the workers.                  Requirement: Sustained progress towards living wages requires adjustments to affiliates' policies.</p>			

**Purchasing Practices Comments:**

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## Monitoring & Remediation

Basic Measures		Comments
% of own production under monitoring	40%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership:	40% (meets threshold)	1 year: 40%; 2 years 60%; 3 years+: 90%

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>2.1 Specific staff person is designated to follow up on problems identified by monitoring system.</b>	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.
<b>2.2 Degree of progress towards resolution of existing Corrective Action Plans.</b>	Moderate efforts have been made to address most CAPs.	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate
	<p>Comment: Corrective actions are discussed with the supplier either during factory meetings or on the phone. Agreements for remediation are made but not structured in a way that Maier Sports is able to follow up on what is already done and what still needs to be improved.</p> <p>Recommendation: It is recommended to structure the follow up of corrective actions that Maier Sports is able to state what implementations have been done when and what the company is currently working on together with the production site.</p> <p>Recommendation: It is important to enhance activities towards remediation of findings at the production sites.</p>		
<b>2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year.</b>	91%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.
	Comment: Factories are regularly visited by staff from Maier Sports.		

<p><b>2.4 Existing audit reports are collected.</b></p>	<p>Yes</p>	<p>Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.</p>	<p>Audit reports are on file; evidence of followup on prior CAPs.</p>
<p>Comment: Existing audit reports are collected but quality not assessed.                  Recommendation: It is recommended to assess the quality of existing audit reports and to use existing findings of non-compliance at the production sites for remediation together with the supplier.</p>			
<p><b>2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner.</b></p>	<p>Yes</p>	<p>FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.</p>	<p>Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.</p>
<p><b>2.6 A structured approach is used to address issues that occur at multiple suppliers.</b></p>	<p>No</p>	<p>Issues that occur in multiple factories often need to be addressed in a systemic manner, especially when the root causes are located in brand management choices.</p>	<p>Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.</p>
<p>Recommendation: Recommendation is to use a structured approach to address issues that occur at multiple suppliers.</p>			
<p><b>2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers.</b></p>	<p>Not applicable</p>	<p>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.</p>	<p>Shared CAPs, evidence of cooperation with other customers.</p>
<p>Comment: Actions taken in the evaluation period have been in-house or with suppliers where no other FWF affiliate is sourcing from.</p>			
<p><b>2.8 Monitoring requirements are fulfilled for production in low-risk countries.</b></p>	<p>Not applicable</p>	<p>Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.</p>	<p>Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.</p>

<p><b>2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)</b></p>	<p>Not applicable</p>	<p>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.</p>	<p>Questionnaires are on file.</p>
<p><b>2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)</b></p>	<p>Not applicable</p>	<p>FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.</p>	<p>Supplier register; Documentation of sales volumes of products made by FWF or FLA members.</p>

**Monitoring Comments:**

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# Complaints Handling

Basic Measures		Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	N/A	
Number of worker complaints resolved since last check.	N/A	

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>3.1 A specific employee has been designated to address worker complaints.</b>	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.
	Comment: Maier Sports has a person in designated to address worker complaints and has not yet received a complaint from a worker at one of their production sites. Recommendation: Nevertheless it is recommended to have an internal approach and idea on what to follow/who to inform/when to act in case a complaint is received.		
<b>3.2 System exists to check that the Worker Information Sheet is posted in factories.</b>	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.
	Comment: Travelling staff is checking the posting of the CoLP.		

<p><b>3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline.</b></p>	<p>50%</p>	<p>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.</p>	<p>Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.</p>
<p>Comment: Most of the workers in one of the two production sites have been neither aware of the CoLP nor the FWF worker helpline. Recommendation: Aside posting the CoLP at the production sites, management of the production sites needs to inform the workers on the CoLP. A good step to ensure worker awareness on their rights and grievance mechanisms is to enrol the factories in the FWF workplace education programme.</p>			
<p><b>3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure.</b></p>	<p>Not applicable</p>	<p>Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.</p>	<p>Documentation that affiliate has completed all required steps in the complaints handling process.</p>
<p><b>3.5 Cooperation with other customers in addressing worker complaints at shared suppliers</b></p>	<p>Not applicable</p>	<p>Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.</p>	<p>Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.</p>

**Complaints Comments**

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## Training & Capacity Building

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>4.1 Staff at affiliate is made aware of FWF membership requirements.</b>	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.
	Comment: Maier Sports staff took place in the FWF seminar for affiliates. Newsletter to staff at Maier Sports includes audit report findings.		
<b>4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements.</b>	No	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.
	Recommendation: To ensure high and detailed knowledge on social standards especially at staff in direct contact with suppliers, FWF recommends trainings on FWF requirements and the CoLP. FWF can be of support upon request.		
<b>4.3 Agents are informed of CoLP requirements and act to support their implementation.</b>	Not applicable	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.
<b>4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume).</b>	0%	Lack of knowledge on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.
	Comment: Maier Sports produces only in production countries where FWF offers the workplace education programme. Recommendation: It is recommended to Maier Sports to actively approach their suppliers to join the FWF workplace education programme to train factory employees on labour rights and grievance mechanisms.		

<p><b>4.5 Factory participation in trainings (where WEP is not offered; by production volume).</b></p>	<p>Not applicable</p>	<p>In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own. Trainings must meet FWF quality standards to receive credit for this indicator.</p>	<p>Curricula, other documentation of training content, participation and outcomes.</p>
<p>Comment: Maier Sports does not produce in production countries where FWF does not offer WEP.</p>			

**Training & Capacity Building Comments**

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# Information Management

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>5.1 Supplier register for the previous financial year is verified as being complete and accurate.</b>	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.
<b>5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers.</b>	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.
Comment: Every Monday a meeting takes place with the top management. Every two weeks a meeting with staff in direct contact with suppliers takes place. An update on social standards is part of the agenda.			

## Information Management Comments:

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# Transparency

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>6.1 Communication about FWF membership adheres to the FWF communications policy.</b>	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.
	Comment: Until end of 2012, FWF membership was communicated very little. Since end of 2012, more communication activities have started. Future plan is to also use the FWF Logo at products (once allowed according to FWF communication requirements).		
<b>6.2 Affiliate engages in advanced reporting activities.</b>	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.
	Recommendation: Since reporting activities on FWF membership are planned to be increased, Maier Sports is recommended to publish e.g. the Brand Performance Check, audit reports or the supplier list on their website.		
<b>6.3 Social Report is submitted to FWF and is published on affiliate's website</b>	Published on affiliate's website	The Social Report is an important tool for brands to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.

**Transparency Comments:**

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# Evaluation

Performance Indicators	Result	Relevance of Indicator	Documentation
<b>7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.</b>	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.
	Comment: FWF is integrated on a strategic level including top management in the evaluation process. The outcome of the evaluation is applied in practices but not in policies.		
<b>7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate.</b>	Not applicable	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.

## Evaluation Comments:

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## Comments to FWF

This area provides an opportunity for affiliates to provide feedback to FWF.

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## Appendix 1: FWF Audit Finding Summary by Country

This chart summarizes the number of time each finding was reported during an FWF Audit in each country.

	China	Turkey
<b>Total Number of Audits:</b>	1	1
<b>Standard Findings</b>		
<b>Sourcing practices</b>		
According to the supplier the prices of the affiliate do not support the payment of living wages.	1	1
Other		1: Order amounts are not balanced.
<b>Monitoring system</b>		
No areas for improvement	1	1
<b>Management system of factory to improve working conditions</b>		
The factory has not posted the Code of Labour Practices in local language with the contact details of the local complaints handler at an easily accessible location for workers.	1	
No areas for improvement		1
Other	1: Subcontractors are not informed about the CoLP.	
<b>Communication and consultation</b>		
There is no effective internal grievance mechanism in place.	1	1
<b>Employment is freely chosen</b>		
No areas for improvement	1	1

<b>No discrimination in employment</b>		
No areas for improvement	1	1
<b>No exploitation of child labour</b>		
No areas for improvement	1	1
<b>Freedom of association and the right to collective bargaining</b>		
There is no independent workers' organisation or union, which is run by workers without management's involvement.	1	1
<b>Payment of a living wage</b>		
Wages are below living wage level as estimated by local stakeholders.	1	1
The factory does not pay leaves and benefits to workers according to legal requirements.	1	
Other		1: Compensation work is applied in factory but OT hours are not paid extra.
<b>Reasonable hours of work</b>		
Excessive overtime was found: <i>please specify:</i>	1: Audit team finds that the monthly overtime hours are around 100 hours as per analysis of the attendance records from Jun to Sept 2012, which exceeds the legal requirements of 36 hours/month. Audit team finds that the weekly working hours around 65 hours up to 70 hours as per analysis of the attendance records from Jun to Sept 2012, which exceeds the limit of 60 hours a week. Workers do not receive at least one day off in a 7-day period and the maximum consecutive working days are 13 days, as per analysis of the attendance records from Jun to Sept 2012.	1: Some workers (especially cutting section) are in dept of 250-300 hours.

<b>Safe and healthy working conditions</b>		
Critical/minor issues regarding fire safety are found		1
Critical/minor issues regarding chemical safety are found	1	1
Critical/minor issues regarding ergonomics are found	1	
Noise, ventilation, temperature and lightening do not comply with legal requirements.		1
<b>Legally binding employment relationship</b>		
No areas for improvement	1	
Other		1: Subcontracting contract is missing.