



## BRAND PERFORMANCE CHECK

---

Manroof GmbH

PUBLICATION DATE: JULY 2019

this report covers the evaluation period 01-01-2018 to 31-12-2018

## ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# BRAND PERFORMANCE CHECK OVERVIEW

Manroof GmbH

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

MEMBER COMPANY INFORMATION	
Headquarters:	Zürich, Switzerland
Member since:	26-11-2008
Product types:	Promotional
Production in countries where FWF is active:	China, India, Turkey
Production in other countries:	Austria, Germany, Italy, Lithuania, 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	82%
Benchmarking score	50
Category	Good

## Summary:

Manroof has met most of FWF's performance requirements. It monitored 82% of its total purchasing volume, which is above the 80% required by members after three years of membership. The benchmarking score of 50 places Manroof in the 'Good' category.

In 2018, Manroof increased its orders at its main supplier in China. This supplier works together with Manroof's external CSR consultant on the implementation of the FWF Code of Labour Practices. Manroof actively follows up on audit findings and hired an external consultant to start the dialogue with its main Indian supplier on a finding which showed payments below the legal minimum wage. In 2018, Manroof's CEO, who is responsible for CSR within the company, actively contributed to FWF's visibility in Switzerland.

In 2018, Manroof made the gap between the average wage and living wage benchmarks visible for two of its Chinese suppliers. Although this is a good first step, Manroof needs to discuss the gap with its suppliers, agree on a target wage, and start implementing measures to close this gap.

While Manroof does conduct due diligence, a formal process should be in place to evaluate the risks of labour violations. Furthermore, additional risk mitigation measures should be taken and a systematic approach for evaluating Code of Labour Practices compliance of Manroof's entire supplier base should be implemented. Moreover, Manroof is required to actively raise awareness about the FWF Code of Labour Practices and FWF complaints hotline among its suppliers. For the next Brand Performance Check, Manroof needs to make sure to meet the monitoring requirements for its tail-end production locations.

## PERFORMANCE CATEGORY OVERVIEW

**Leader:** This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good:** It is FWF's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement:** Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended:** Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## 1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	74%	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 69% of its total production volume. At four suppliers Manroof buys at least 10% of the suppliers' production capacity, making up 74% of Manroof's total production volume.

It is part of the company's sourcing strategy to cooperate with suppliers that are similar in size to Manroof, thus increasing the influence it has on CoLP implementation.

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 27 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, however, this aim is not explicitly formulated in a sourcing strategy, which makes it vulnerable to changes in case of staff turnover.

**Recommendation:** It is advised to describe Manroof's aim to work with a constant number of suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

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.	88%	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 14 out of its 27 active suppliers that take up 88% 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 longterm business relationships, as it takes time to build the trust needed to work together with suppliers on implementing the CoLP. This aim is not explicitly included in a sourcing policy, which makes it vulnerable to changes in case of staff turnover.

**Recommendation:** FWF recommends Manroof to maintain stable business relationships with suppliers. Long term relationships support most aspects of the CoLP, and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	0	2	0

**Comment:** Manroof stores all signed questionnaires on its server. It could show the signed questionnaires of all new suppliers, except for two European suppliers. Manroof sent three reminders to one of these suppliers and learned after some time that its contact person was no longer working at the company. Manroof is now in direct contact with the owners, who promised to return the questionnaire to Manroof. The other supplier for which the questionnaire is missing turned out to be bankrupted.

Although Manroof showed an effort to get all the signed questionnaires on file, this is not in line with FWF's policy as members need to make sure to receive the signed questionnaires before orders are placed.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0



**Comment:** 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.

The CEO has the final say regarding sourcing decisions. These decisions are influenced by the potential compliance of new suppliers with the CoLP, but this is done in an informal, intuitive way, and is not included in a policy.

Most of Manroof's production takes place in China and Europe. Europe is preferred as working conditions are relevantly 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 FWF 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). However, Manroof has not looked into the country-specific risks for these counties 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.

**Requirement:** A formal process should exist to evaluate the risks of labour violations in the production areas Manroof is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary

**Recommendation:** FWF recommends Manroof to put its approach to human rights due diligence, for example, the steps taken before adding a new supplier and the preferred production countries and country-specific risks on paper as a reference document. Furthermore, FWF recommends to include the total available capacity of suppliers in the evaluation process to get further indications of whether outsourcing may be needed.

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.	No	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.	0	2	0

**Comment:** Manroof uses the Corrective Action Plan (CAP) findings to monitor its main suppliers. Therefore the compliance with the CoLP is only evaluated for its three audited factories. Manroof does not yet have an overview of its suppliers' compliance with the CoLP that can form the basis for sourcing decisions. When suppliers do not show enough improvements to the audit findings, Manroof tries to find alternative suppliers. When moving the entire production is not possible, Manroof places as little orders as possible at the suppliers that show a lack of improvements to audit findings. When suppliers do show progress to the audit findings, Manroof rewards this by placing stable orders.

**Requirement:** 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.

**Recommendation:** FWF recommends Manroof to share and discuss the outcome of the supplier evaluation with all its suppliers

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** 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. 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. At one supplier excessive overtime was found in an audit in November 2017. After the audit, the supplier did not want to work on a follow up with Manroof at all. Therefore, Manroof lowered its production at this supplier as much as possible.

**Recommendation:** Manroof could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. FWF recommends cooperating 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:** FWF 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.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

**Comment:** During the audit in January 2018 at Manroof's Indian supplier, the offside interviews indicated payment below legal minimum wage. Manroof discussed this issue with its supplier. Although the supplier was very cooperative on the other findings, it did not agree on this finding. Together with FWF, Manroof found an external consultant to help with this case. At first, the supplier did not want to have a dialogue with the consultant but when Manroof used its next order as leverage, the supplier did agree on discussing the minimum wage case with the consultant. Unfortunately, Manroof's client delayed the order and therefore the dialogue with the consultant did not take place yet. In the meantime, Manroof is considering moving its production to another Indian supplier.

Manroof's supplier in China did not want to share wage records during an audit in November 2017. As the supplier rejected any dialogue after the audit, Manroof could not follow up on this finding.

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 2018.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

Comment: In 2017 and 2018, Manroof's main supplier, responsible for 69% of its total production volume, shared records on the average wage levels. The wages increased between 2017 and 2018 but are still below the Asia Floor Wage. According to Manroof, the inadequate payment system of the factory is one of the root causes for the wages below the living wage benchmark. The supplier does not differentiate between regular hours and overtime hours in its payment system. Furthermore, statutory holidays and annual leave are not paid correctly. Manroof discussed this issue with its supplier and the supplier agreed on starting to pay leaves as required by law. This could not yet be verified in the available wage records. Another supplier, responsible for 1% of Manroof's production also shared wage information. For this supplier, the wages increased as well between 2017 and 2018 but are still below the Asia Floor Wage.

Recommendation: FWF advises Manroof to continue its assessment of the root causes for wages below living wage benchmarks and verify whether the payment system of its main supplier indeed improved.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	4	0

**Comment:** In 2018, Manroof combined average wage information from two of its suppliers (producing 69% and 1% of its total production volume) with estimations of the Asia Floor Wage, the Anker Floor Wage, the industrial wage, and the legal minimum wage. In these figures the gap between the average wage and the Asia Floor Wage is visible.

Manroof has not discussed this gap with its suppliers yet. It wants to contribute to bridging the gap by increasing its prices. In order to do this, Manroof needs support from its customers as they will have to pay a higher price. A long-term partnership with a supplier and more visibility of FWF in Switzerland could contribute to the willingness of its clients to pay higher prices. In general, Manroof feels that there is not enough support from FWF in the process of working towards living wages in China.

On the supplier side, Manroof wants to understand how to get the money to the workers. The main challenges it foresees is the lack of transparency on this topic. Manroof is planning to draft a contract with its suppliers, ensuring that the extra money they pay, would actually go to the worker.

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

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	0%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	3	0

**Comment:** Manroof has not yet agreed on target wages with suppliers

**Requirement:** Manroof is expected to begin setting a target wage for its suppliers.



---

## PURCHASING PRACTICES

Possible Points: 47

Earned Points: 22

---

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	77%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	5%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	No	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	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.	
Total of own production under monitoring	82%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

Comment: For the Chinese suppliers, Manroof's CSR consultant works 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. For the Chinese audit, Manroof divided the CAP findings into relatively easy and more difficult issues to follow up. For the relatively easy issues, it set a deadline for the supplier. For the audit at Manroof's Indian supplier, it referred to the deadlines in the CAP. 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.	Basic	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.	4	8	-2

**Comment:** Manroof's external CSR consultant is responsible for monitoring the follow up of CAPs in China. She shares proof of improvements with Manroof and updates the CAP reports according to the remediation statuses of the different findings. Manroof stores the evidence (photos, emails, documents) on its server. No follow up was possible after the audit at Manroofs Chinese supplier in November 2017 as this supplier refused to cooperate. Manroof then began sourcing elsewhere and hopes to move all its production away from this supplier.

For the Indian supplier, Manroof follows-up on the CAP findings by sending (reminder) emails to its supplier. The relatively easy issues found during the January 2018 audit are solved and Manroof could show proof of this during the Brand Performance Check. For the more difficult issues, the supplier is reluctant to make progress (see also indicator 1.9). Manroof sent reminder emails to the supplier but could not stimulate any further cooperation of the supplier. Manroof is now looking into alternative suppliers in India.

Recommendation: FWF 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.	76%	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 2018, Manroof (representatives) visited suppliers responsible for 76% of its production volume. During these visits working conditions have been discussed. Manroof uses the FWF checklist for supplier visits.

Recommendation: FWF recommends documenting the outcome of visits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	2	3	0

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average insufficient result on relevant policies	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	Insufficient			-2	6	-2

**Comment:** Manroof sources at one Turkish supplier. This supplier produces less than 1% of Manroofs total production volume. Manroof did not take any risk mitigation steps to deal with the risks related to Turkish garment factories employing Syrian refugees.

Manroof did discuss gender-based violence risks with its Indian supplier and excessive overtime risks with its main Chinese supplier but did not take any other concrete actions to mitigate these risks. For Portugal and Italy, no risk mitigation took place in 2018.

**Requirement:** FWF requires Manroof to take concrete steps by mapping its supply chains in Turkey and ensure that audits take place in first tier production locations including all authorized subcontractors. Alongside this process, 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.

Manroof's monitoring system should identify and address high-risk issues that are specific to its sourcing practices. FWF provides policies and country-specific requirements for Member companies. Priorities in remediation efforts are guided by these policies.

**Recommendation:** The member brand could schedule a 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 refugee workers are working. WEP module on Syrian refugee workers is developed for management and for Turkish and Syrian workers.

FWF 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, FWF 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

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 15% 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. All production sites in low-risk countries must:

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



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: One tail-end production location has been audited by another FWF member in 2018 but since Manroof does not meet the monitoring requirements for all its tail-end production (not all have been visited in the last three years), it cannot earn points for this indicator.

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 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).	9%	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 9% 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: 16

---

### 3. COMPLAINTS HANDLING

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

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

Comment: 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.

**Recommendation:** It is suggested to ask suppliers to submit a photo of the posted Worker Information Sheet in such a way that the location is visible.

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.	0%	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.	0	6	0

**Comment:** Over the last three years, Manroof did not take steps to actively raise awareness of the FWF CoLP and complaints hotline. Its external consultant did implement a training program at Manroof's main supplier in China but as this was in 2019, it does not count for this Brand Performance Check.

**Requirement:** FWF requires Manroof to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline. Manroof should ensure good quality systematic training of workers and management on these topics. To this end, Manroof can either use FWF's Workplace Education Programme (WEP) basic module or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF's guidance on training quality standards is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

## COMPLAINTS HANDLING

Possible Points: 9

Earned Points: 3

## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** 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. Manroof hosted the FWF National Swiss Members and Stakeholder annual meeting and participated in the FWF Live Q&A Marathon on Facebook.

**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.	1%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	1	6	0

**Comment:** Another FWF member implemented the Workplace Education Program (WEP) on violence prevention at one of Manroof's Indian suppliers.

**Recommendation:** FWF 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 behavioural change and long-term structures to improve working conditions. To this end, Manroof can make use of FWF's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No 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 was not involved in follow up activities after the WEP mentioned at indicator 4.4.

Recommendation: FWF recommends Manroof to check whether their 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: 6

---



## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Manroof uses the questionnaires to find out whether production is subcontracted or not and actively checks production facilities and capacity during on-site visits. As its Chinese supplier was not willing to cooperate after the FWF audit, Manroof could not follow up on the finding of outsourced printing. During the Brand Performance Check, it became clear that not all subcontractors of Manroof's main supplier were included in FWF's information system. The missing subcontractors were added soon after the Check. However, Manroof also indicated that some suppliers source part of the production via agents and Manroof does not know where these agents place their orders.

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

**Recommendation:** Manroof is advised to develop a systematic approach to complete the production location list. Part of the approach can be:

1. Automatically include information from the questionnaire, 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.

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 shared its social report with FWF and posted it on its website.

## TRANSPARENCY

Possible Points: 6

Earned Points: 5

### Additional comments on Transparency:

In 2018, Manroof invested time and money in increasing FWF's visibility in Switzerland. It organised meetings with other FWF brands and FWF's consultant and suggested follow up actions for FWF. Furthermore, Manroof made sure that FWF was added to two Swiss CSR standard overviews.

## 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.	10%	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.	2	4	-2

Comment: In last year's Brand Performance Check, two requirements were included:

- For indicator 1.11, Manroof was required to take adequate steps to move towards living wages as estimated by local stakeholders. In 2018, Manroof took additional steps in this process by creating a graph showing the gap between the current wage and living wage benchmarks for two suppliers. As the gap was not yet discussed with suppliers, we count this as 10% progress on this requirement.

- For indicator 5.1, Manroof was required to find out the FOB figures of its subcontractors and include the figures in the factory list in FWF's information system. In 2018, some subcontractors were added to FWF's information system, none of these are CMT subcontractors, hence no FOB is required. However, Manroof also shared that it is not aware of all subcontracting as some suppliers source via agents and Manroof does not know where these agents source. We count this is also as 10% progress on this requirement.

---

## EVALUATION

Possible Points: 6

Earned Points: 4

---

## RECOMMENDATIONS TO FWF

- FWF could reward members for which top management is responsible for CSR.
- FWF could reward Manroof's engagement in increasing FWF's visibility in Switzerland.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	22	47
Monitoring and Remediation	16	33
Complaints Handling	3	9
Training and Capacity Building	6	13
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	60	121

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

50

### PERFORMANCE BENCHMARKING CATEGORY

Good



## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

29-05-2019

Conducted by:

Linda van IJendoorn

Interviews with:

Jacques von Mandach - CEO

Zuzana Valient - Backoffice & Finance