



Brand Performance Check

Mammut Sports Group AG

Publication date: June 2020

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

About the Brand Performance Check

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

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

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

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

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

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

Brand Performance Check Overview

Mammut Sports Group AG

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

Member company information	
Headquarters:	Seon , Switzerland
Member since:	2008-09-25
Product types:	Outdoor products, Sports & activewear, Bags, Outdoor wear
Production in countries where Fair Wear is active:	Bangladesh, China, India, Myanmar, North Macedonia, Romania, Viet Nam
Production in other countries:	Cambodia, Germany, Latvia, Lithuania, Philippines, Poland, Portugal, Switzerland, Taiwan
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	94%
Benchmarking score	75
Category	Leader

Disclaimer

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

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

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

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

Summary:

Mammut has met most of Fair Wear's performance requirements. The brand monitored 94% of its suppliers, which meets the required monitoring threshold after three years of Fair Wear membership. With a score of 75 points, Mammut returns to the 'Leader' category.

In 2019, Mammut continued with its sourcing strategy to transfer production from China to Vietnam and Bangladesh. The brand made use of 59 production locations, which is a small decrease compared to the previous year. Mammut has long term relationships with its main suppliers, which usually have multiple production locations in various countries. The shift in production locations by its main suppliers meant that Mammut had to build new relationships with those new factories, monitor them and follow up on labour standard violations. Mammut has a strategy in place to further reduce the total number of suppliers.

Mammut has good systems in place to monitor suppliers, evaluate their performance and assess country risks.

In 2019, Mammut also made further progress on the topic of living wages. Using its initial research on price calculations by factories as the basis, the brand continued to research the current labour minutes per style and made an overview of the current wages paid to sewing workers in its most important factories. In addition, the company compared the current wages to the living wage estimate provided by the Global Living Wage Coalition. Fair Wear recommends that Mammut expands its knowledge of cost breakdowns of all product groups. A next step would be to use the labour minute costs of its products to be able to link the prices to wages, in order to be able to influence wage levels.

Fair Wear recommends that Mammut actively raises awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline among a larger portion of its suppliers.

Performance Category Overview

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

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

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

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

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

1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	47%	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.	2	4	0

Comment: Mammut sources from 16 countries and 59 production locations. The brand has made the strategic decision to move its production from China to Vietnam and Bangladesh. In this transitional period, it is building up leverage at the new production locations and the brand aims to consolidate its supplier base.

Recommendation: Fair Wear recommends Mammut to continue to consolidate its supplier base where possible, and increase leverage at the main supplier(s) to effectively request improvements of working conditions. In addition, FWF recommends Mammut to take leverage into consideration when moving its production to Vietnamese and Bangladeshi production locations for its new suppliers. The brand should consider the risk of human rights violations at suppliers, the influence it has to bring change and the impact it can have at factory level.

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.	27%	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.	0	4	0

Comment: Mammut aims to reduce its tail end. Compared to 2018, Mammut has reduced the total number of production locations slightly. Mammut's goal remains to consolidate its supplier base in the coming years.

Recommendation: Fair Wear recommends Mammut to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, members should determine whether suppliers, where they buy less than 2% of their FOB, are of strategic relevance. Shortening the tail of their production will reduce exposure to social compliance risks for Mammut and will allow them to improve working conditions in a more efficient and effective way

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.	29%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	2	4	0

Comment: Mammut has been working for a long time with many of its main suppliers. The brand values these long-term relationships. These suppliers often have multiple production locations in various countries. Due to its new sourcing strategy, Mammut is moving production to new production locations but stays with the same main suppliers. Although Mammut knows the main suppliers very well, the brand will have to assess the status of working conditions at the new production locations and will have to build up new relationships with local factory management.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: In 2019, Mammut started sourcing from 2 new production locations. The brand showed that the questionnaires were on file.

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.	Advanced	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.	4	4	0

Comment: Mammut focuses on a limited number of countries to keep track of the human rights situation. The company uses information like Fair Wear's country studies and other stakeholder information to keep up to date of the general situation in its sourcing countries. The general findings related to excessive overtime in China have contributed to the company's decision to move production to Vietnam, where the brand finds production locations are stricter in managing excessive overtime.

New suppliers selected by Mammut are assessed according to a scoring system. During visits by senior staff, Mammut explains its position with regards to labour standards and Fair Wear. Information from its general country risk assessment and Fair Wear's Health and Safety checklist is taken into account. It also collected several existing audit reports. This information is included in the scoring system, which is used to decide where to produce. It is in the company's procedure that there is a limited number of people who are allowed to on-board a factory. These people have been trained on Fair Wear requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

Comment: Mammut has a supplier evaluation system in which it scores human rights issues per supplier as part of its overall performance. It has set up a traffic light system where issues are marked as red (critical), orange (major) or yellow (minor issue). Supplier performance is evaluated annually and shared in meetings between the supplier and the brand.

The supplier evaluation is used as input for internal discussions with buyers when deciding on production for next season. In the past, the supplier evaluation has been mainly used to phase out production at production locations that were not performing well. In 2019, Mammut has also used the insights from the supplier evaluation to move production to well-performing production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: Mammut has two seasonal types of products (summer and winter) and a range of Never Out of Stock-items. Lead times are between 3 - 8 months, depending on the type of product.

Mammut agrees on a production capacity plan with its suppliers at the beginning of the year indicating order dates and order amounts. To facilitate balanced production planning, Mammut shares detailed forecast information with suppliers, which are updated monthly and include an estimate about the delivery of fabric. All suppliers need to agree on order dates. Mammut is able to shift a part of its Never Out of Stock-production to the low-season.

Mammut made progress in estimating the standard minute per style which it relates to the factory's quotations based on an open costing model. The brand does not know the exact total production capacity of each factory. For some critical products, Mammut reserves specific working lines in the factory.

Mammut has introduced a calculation sheet related to the forecast and actual production that allows the brand to recognize issues with production volumes at a particular factory in an early phase. If they recognize a potential issue, the brand proactively approaches the production location to discuss the issue Mammut observes. Mammut has reserved substantial margin time in its delivery cycles to ensure that order delays can be handled. In case of delay, Mammut either accepts the delay or considers splitting orders or air freight.

In 2019, Mammut shared its planning approach with Fair Wear staff as input for guidance on reducing excessive overtime.

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: In 2018, one factory in China had multiple Fair Wear complaints about excessive overtime. Mammut has often addressed the issue with factory management, including a comprehensive root cause analysis. It turned out that the root cause was related to producing during peak season. The brand has used this information to adjust its planning system and allow for pre-orders and split orders to accommodate a more spread-out production for all production locations.

For another factory in China, the overtime was caused by a declining workforce. There Mammut agreed to adjust its production planning and allow for increased lead times to reduce overtime.

As Mammut is not the only customer at these production locations, these measures have not yet resulted in verifiable reduction of excessive overtime.

Recommendation: As excessive overtime persists in Mammut's production locations despite the efforts of the brand, Fair Wear recommends Mammut to discuss additional measures production locations can take, such as including other customers in addressing the issue.

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.	Advanced	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.	4	4	0

Comment: Mammut follows a partnership approach when negotiating prices. When developing a new style, Mammut involves its suppliers in the process and agrees on a target price based on feedback from suppliers as well as past experience. Part of the process is the discussion of an open costing sheet (fabric, CMT and trims). The open costing sheet includes a standard minute cost provided by the supplier, which is crossed checked with an international database against legal minimum wages.

The starting price can be higher or lower than the target price. Mammut and the supplier then work towards the target price by looking at the design and material costs. Once the price is set, it remains fixed for this specific style and is not renegotiated with every order, except when wages rise. Mammut was able to show that even for carryover styles prices were adjusted for wage increases from year to year.

In follow-up research, Mammut has been analyzing the wage levels of the sewing workers in their factories. As they mostly use Fair Wear audits they have used the wage ladder information for this analysis which does not include all factories Mammut sources from. The brand is now generally aware of the wage levels in their production locations responsible for approximately 70% of FOB and could make a calculation on how it relates to their buying prices as they know the standard minutes per style. However, the company does currently not make this connection.

Recommendation: Fair Wear recommends Mammut to expand their knowledge of cost break downs of all product groups. A next step would be to use the labour minute costs of its products to be able to link the prices to wages, to be able to influence wage levels.

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: In 2019, there were two audits in factories in Myanmar where the legal minimum wage was not paid to apprentices and people in their probation period. The audit also showed that the factories had an offline and online system to track attendance, which made it difficult for the auditors to verify wages. Mammut followed-up on these findings. Regarding the first finding, the factories replied it was within legal regulations. Regarding the second finding, the factories have indicated they have fixed the system, this has not been verified.

Recommendation: Fair Wear recommends Mammut to more actively follow-up on audits indicating wages could not be verified. In addition, members are recommended to investigate the wage levels at supplier factories to ensure that at least the legal minimum wage i.e. no payment at trainee (50% of LMW), or probation period (75%) levels, is paid to workers. Fair Wear recommends Mammut to verify whether legal minimum wage issues have actually been resolved in case factory management claims so. Mammut could hire a local consultant or plan a monitoring visit of one of FWF's auditors to check whether the issue has actually been resolved.

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 late payments were observed in 2019.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

Comment: Mammut has done research about price calculations by factories and how factories calculate overhead, direct and indirect labour costs, through a supplier survey. As mentioned under 1.8, Mammut has built on this by doing further research on the wage levels of sewing workers in their production locations. The results of the research have been discussed with the factories, but so far factories have not been willing to discuss wage increases.

Recommendation: Fair Wear encourages Mammut to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and long term business relationship.

Fair Wear encourages Mammut to involve worker representatives and local organizations in assessing the root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally at Mammut and with supplier's top management, to form a basis for an embedded strategy.

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

Comment: Mammut does not have any production in factories owned by the member brand.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	6	0

Comment: In 2019, Mammut has done a wage gap analysis, comparing current mode wage levels of the sewing department of 21 factories against the local union demanded wage level or Global Living Wage Coalition estimate. In addition, the company has calculated what it would cost to raise wages to Asia Floor Wage. At the moment the company has not started to develop a financing strategy, as they are discussing how to approach this with the factories.

Recommendation: It is advised that the strategy for how to finance wage increases is agreed upon by top management.

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.	2%	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.	2	6	0

Comment: Mammut used the Global Living Wage Coalition estimates as a reference point for wages in Vietnam and China and Trade Union demands in other countries. Based on the mode wage plus benefits there are two factories where this living wage is paid - representing 2 % of FOB.

Recommendation: We encourage Mammut to show that discussions and plans for wage increases have resulted in the payment of a target wage.

Purchasing Practices

Possible Points: 52

Earned Points: 31

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.		
% of production volume where approved external audits took place.	11%	
% of production volume where Fair Wear audits took place.	74%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	9%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
% of production volume where an audit took place.	85%	
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	In the tail end of Mammut's supplier base, FWF requires Mammut to ensure it audits all production locations that: <ul style="list-style-type: none"> • Produce more than 2% of the member's volume • Where the member has more than 10% leverage • Where a high risk policy applies • Where a complaint is submitted. 	
Total monitoring threshold:	94%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: The Head of Vendor is responsible for following up on issues identified by the monitoring system. This happens in close cooperation with other purchasers and technical staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	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: In 2019, thirteen FWF audits were conducted. Mammut shares audit reports with the factories as soon as Mammut receives the report from FWF. It ensures that timelines for the corrective action plan (CAP) are set up. Mammut did not share the audit reports with available worker representation at these production locations. The brand requested Fair Wear to make a contact point available in each factory, e.g. an email address of the worker representation.

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

Comment: Mammut has set up a traffic light system to track social issues at suppliers based on the audit outcomes and CAPs. The brand marks those issues as red, orange or yellow. Mammut is especially strong in keeping track of the progress towards the resolution of existing CAPs. Despite the fact that Mammut keeps track of the progress made, issues were sometimes closed without proper verification by Mammut or an independent third party.

Recommendation: Fair Wear encourages Mammut to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices.

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.	51%	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.	3	4	0

Comment: Mammut has a Far East Quality Office (FEQO), with people based in China, Vietnam and the Philippines. Some of the people in the Quality office have been trained on CSR specifically and will also include this topic when visiting. In 2019, Mammut visited production locations responsible for 51% of the total FOB.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	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.	3	3	0

Comment: Mammut regularly collects existing audit reports of other organizations, like BSCI, Sumations, Elevate or other Fair Wear brands who have their own audit system. The brand could show evidence of active follow-up, but did not do an audit quality assessment on recent external audits, because it was a repeat audit with the same company.

Recommendation: Fair Wear recommends Mammut to use the Audit Quality Assessment Tool and immediately discuss with the supplier what information is missing and how to collect that information.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	4	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Intermediate			3	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	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

Comment: Mammut sources 16% of its production from two Bangladeshi production locations. Both production locations have been audited by the Bangladesh Accord or the Bangladesh Alliance on Fire, Building and Electrical safety issues in 2018. Both production locations have some CAP issues still open or pending on verification. The brand is not a signatory to the Bangladesh Accord and therefore cannot receive full points on this indicator.

The Burmese factories (2% of production) have been audited and received training (WEP basic) by FWF. Mammut addressed the basic items of the Fair Wear Enhanced Monitoring Programme on Myanmar. In its social report, the brand publishes per labour standard what issues have been found in the factories and how Mammut is addressing this, including wage ladders. This factory underwent training on the WEP communication module of Fair Wear and participated in the first testing of the age verification guidance which we organized at the factory in 2017. The factory has not participated in subsequent supplier seminars on age verification that Fair Wear organized. As mentioned under 1.9, the audits showed that the legal minimum wage was not paid to apprentices and people in their probation period.

Mammut keeps track of specific risks per country by analyzing the outcomes of audit reports and creating an overview of most common risks. Furthermore, the Corporate Responsibility department assesses each new country individually in relation to specific human rights risks before it starts sourcing from a country, which is then also linked to individual factory visits. For 2019, migrant workers were a topic Mammut had identified as a priority. At first mainly in Taiwanese hardware production locations. However, during a regular discussion with their Lithuanian production location, it turned out they had Vietnamese migrant workers. Mammut addressed the topic with the production location and ensured proper remediation.

Recommendation: Mammut is advised to enrol factories in Fair Wear's training on age verification for Myanmar. The training will be arranged by Fair Wear on an annual basis and is (for the moment) free of charge.

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.	Active cooperation	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.	2	2	-1

Comment: Mammut shares several factories with other FWF-members. Mammut actively cooperates with those members to resolve issues, such as CAPs or complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100% AND member undertakes additional activities to monitor suppliers	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.	3	3	0

Comment: Mammut has production at 11 production locations in Latvia, Lithuania, Germany, Portugal, and Switzerland. The brand ensured that it received a signed FWF questionnaire and the FWF Code of Labour Practices was posted. In 2019, it also started to collect audit reports for production locations in low-risk countries.

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: Mammut does not meet the tail end requirements. Therefore, the indicator is rated n/a.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	Yes, and member has information of production locations	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.	1	1	0

Comment: Mammut has two licensees, who are both Fair Wear member and filled out the Fair Wear questionnaire and informed Mammut of the production locations.

Monitoring and Remediation

Possible Points: 31

Earned Points: 26

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check	4	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	5	

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: The Head of Vendor is responsible for addressing worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	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: Mammut regularly checks with suppliers whether the supplier posted the Worker Information Sheet by visiting the supplier or by asking for a picture.

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.	20%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: In the last three years, Mammut invested in WEP Basic training modules. In total, 12 factories were trained to increase the awareness of management and workers on the Fair Wear worker helpline.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes + Preventive steps taken	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.	6	6	-2

Comment: In 2019, Mammut received five complaints at four factories. All complaints have been dealt with in a timely manner and been resolved to date. Mammut has actively taken steps are taken to uncover root causes of the problem and prevent them from recurring. In addition, Mammut could explain two cases where they acted to prevent complaints from happening. When appropriate Mammut has followed up with the brands that were active on these complaints and supports where possible. When complaints come in regarding excessive overtime Mammut will analyse their own process and adjust where possible.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

Comment: In 2019, Mammut actively worked with other (Fair Wear) brands to resolve multiple complaints.

Complaints Handling

Possible Points: 17

Earned Points: 15

4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: The staff of Mammut is well-informed about Fair Wear membership. Mammut informs staff through:

- A quarterly employee newsletter
- Quarterly management information for staff
- An internal blog
- Special training for sales and distribution employees
- Special training for employees in the Purchasing, Quality Control, Product Development departments (at least once a year)

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: All staff in regular contact with suppliers are well aware of Fair Wear membership requirements and briefed regularly. In addition, all staff in direct contact with suppliers receive training on social compliance, risks per country and how Fair Wear supports to mitigate risks.

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.	Member does not use agents/contractors	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.	N/A	2	0

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.	12%	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.	2	6	0

Comment: In 2018, the brand had two factories in the Better Work Programme, responsible for 6% of FOB. In addition, Mammut started the WEP communications module in one factory in Vietnam and one factory in Myanmar at the end of 2019, responsible for 6% of FOB.

Recommendation: Fair Wear recommends Mammut 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 and structural change to improve working conditions. To this end, Mammut can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist 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.	Active 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.	2	2	0

Comment: Mammut is discussing the progress on the Better Work programme with their Vietnamese factories. Follow-up on WEP communications will be evaluated in the next performance check.

Recommendation: Fair Wear recommends Mammut to discuss outcomes of dialogue sessions with their supplier and what steps management is planning to further strengthen dialogue between workers and management. This may include holding an independent worker representative election; regular meetings between worker representatives and management to discuss improvements to working conditions or allowing worker representatives to conduct a worker survey on specific issues. Mammut should also investigate how they can contribute to implementing the action plan workers and management have agreed on (e.g. by adjusting sourcing practices).

Training and Capacity Building

Possible Points: 11

Earned Points: 7

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	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.	6	6	-2

Comment: In 2019, Mammut has strengthened the quality department and has trained them on CSR issues. They are the eyes and ears in the factory during the production process and are closely following where production takes place. People from the Quality department are more actively involved in CSR follow-up and their input is documented in the central supplier evaluation system.

In addition, the company has strengthened procedures to prevent any unauthorized subcontracting - checking prior to production, during production and after production where goods are made. Audits in 2019 did not show any unauthorised subcontracting.

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: All relevant staff has access to audit reports and CAPs. Purchasers, quality control staff and technicians that visit suppliers are regularly updated on CAP issues and instructed by the Head of Vendor. Staff members are actively involved in discussing CAP follow up. Relevant feedback of Mammut's staff is included in the CAP follow up system.

Information Management

Possible Points: 7

Earned Points: 7

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: All communication adheres to the Fair Wear communication policy. Mammut communicates about Fair Wear on its website, in its supply chain newsletter, product flyers, etc.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	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.	2	2	0

Comment: Mammut publishes the Brand Performance Check reports on its website. Furthermore, the brand published all its 2018 production locations in its social report. It is also transparent about most issues that are found at the suppliers. As of 2018, Mammut participated in the Fashion Transparency Index.

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: Mammut published the social report on its website.

Transparency

Possible Points: 6

Earned Points: 6

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: Mammut evaluates steps taken in the context of FWF membership as part of regular internal discussions. Performance on monitoring and improving labor standards in the supply chain is measured and evaluated during quarterly Corporate Responsibility (CR) meetings that involve the CSR coordinators and top management. A yearly evaluation of FWF membership is made during the process of writing the work plan and receiving FWFs performance check report.

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.	66%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: In the previous performance check Mammut received requirements for indicator 1.13 and 1.14 and a requirement regarding its tail-end monitoring. In 2019, the company was able to show progress on indicator 1.13 and 1.14. Unfortunately, the requirement regarding tail-end monitoring remains.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

What is not visible in the system is all the additional efforts Mammut puts into Fair Wear, it would be good if it was reflected in the scoring as some sort of bonus.

- Living Wage Incubator
- Overtime project
- Member expert group
- COVID response
- Support peer-learning for first-year members

Scoring Overview

Category	Earned	Possible
Purchasing Practices	31	52
Monitoring and Remediation	26	31
Complaints Handling	15	17
Training and Capacity Building	7	11
Information Management	7	7
Transparency	6	6
Evaluation	6	6
Totals:	98	130

Benchmarking Score (earned points divided by possible points)

75

Performance Benchmarking Category

Leader

Brand Performance Check details

Date of Brand Performance Check:

29-05-2020

Conducted by:

Anne van Lakerveld

Interviews with:

Michael Farnworth - Head of Vendor Control