



Brand Performance Check

Mini Rodini AB

Publication date: November 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

Mini Rodini AB

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

Member company information	
Headquarters:	Stockholm , Sweden
Member since:	2015-12-31
Product types:	Garments, clothing, fashion apparel; sports & activewear
Production in countries where Fair Wear is active:	China, India, Turkey
Production in other countries:	Lithuania, Portugal
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	94%
Benchmarking score	72
Category	Good

Disclaimer

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

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

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

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

Mini Rodini has met most of Fair Wear's performance requirements. In recent years, Mini Rodini changed CSR staff several times. Although some policies are fully integrated into the processes of the brand, such as the due diligence approach, these changes created challenges on closely monitoring progress on remediation. This is reflected in the benchmarking score of 72. This score together with a monitoring percentage of 94% means the brand is now in the 'Good' category.

Mini Rodini's sourcing strategy aims for long-term sustainable business relationships. Part of this strategy is that the company aims to buy no more than 40% of the production capacity. This is to ensure the supplier is not fully dependent on Mini Rodini. Long-term business relationships is demonstrated by the fact that in 2019, the percentage of production volume from production locations where a business relationship exists for at least five years increased from 41% to 70%.

In the past financial year, Mini Rodini continued to contribute to living wages in production locations in Turkey and India. Although it pays this contribution, the company does not have full insight into the link between their prices and wages.

With regard to production planning and pricing, Fair Wear advises Mini Rodini to adopt a more systematic approach. Labour minute costing per style should inform the brand's planning system and price setting. Mini Rodini shows much commitment to follow up on CAP findings and complaints. A next step would be to analyse what CAP and complaint issues are more structural and develop an approach to prevent these issues from occurring throughout the supply chain. Suppliers who do better on issues such as overtime may inspire other suppliers to improve. Therefore, Mini Rodini could explore whether facilitating supplier exchanges, where suppliers can learn from each other, could be a tool to tackle root causes of recurring CAP issues.

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.	78%	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.	4	4	0

Comment: Mini Rodini's sourcing strategy aims for long-term sustainable business relationships. Part of this strategy is that the company aims to buy not more than 40% of the production capacity, to ensure the supplier is not fully dependent on Mini Rodini. In 2019, the percentage of production volume from production locations where Mini Rodini buys at least 10% of the production capacity increased from 74% to 78%.

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.	7%	Fair Wear 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 Fair Wear.	3	4	0

Comment: Mini Rodini has a consolidated supply base and distributes the majority of its FOB to key suppliers. A few suppliers are used for small orders of special/seasonal items. Per product item Mini Rodini mostly only sources from one supplier.

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.	70%	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.	3	4	0

Comment: Mini Rodini highly values their suppliers and aims to create a lasting business relationship. This shows, because in 2019, the percentage of production volume from production locations where a business relationship exists for at least five years increased from 41 to 70%.

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.	2nd years + member and no new production locations selected	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.	N/A	2	0

Comment: Mini Rodini did not add new factories in 2019.

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: Mini Rodini has a clear sourcing policy with human rights due diligence as an important element of the selection process, detailing all steps needed before a production location can be added. This policy addresses environmental standards (for eco-friendly materials and various certifications of factories) and social compliance requirements for new suppliers. It includes prioritised critical risks concerning its specific product assortment such as: unauthorized subcontracting and Syrian refugees in Turkey.

Sourcing of new production locations is done by the Sustainability Manager, which means that working conditions and social compliance is looked at first, using a supplier profile checklist. Suppliers are presented to the responsible buyer and Head of Assortment and Production and an applicable business related interview and quotation takes place by the buyer. After all data is collected, the group takes a mutual decision which supplier to choose to start working with.

When an order is placed, the factory is enrolled in Mini Rodini's social monitoring program. The CoLP posters are hung on their walls, informing workers about their labour rights and providing them with the number of the complaint helpline. When the factory is in a high risk country, Mini Rodini requests an existing audit report.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

Comment: Mini Rodini had a supplier evaluation system in place and realised in 2019 that it was not functioning properly. Although production location's performance is constantly discussed, the company did not manage to develop an alternative mechanism to systematically evaluate production location compliance with the Code of Labour Practices.

Recommendation: Fair Wear encourages Mini Rodini to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a system can show whether and what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

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: Mini Rodini plans full orders (fabric and products) at the same time. Lead time for fabrics as well as consideration of national holidays are taken into account. Delivery times are planned together with the factories. Mini Rodini does not know labour minutes per product but does discuss capacity of the suppliers.

The work on design specifications is key to reducing overtime hours, and with two pattern makers in house, Mini Rodini is able to sketch as accurate as possible for order sizes. This minimizes the number of sample rounds and consequently there is more time for production. Mini Rodini is aware that changes to designs in later stages can have a significant impact on working hours. Because it sells children's clothing which is less influenced by fashion trends, it is easier to decide not to add changes to the designs. Buyers are aware that a delay in responding to suppliers asking for confirmations may cause a large production delay.

The member has some basic styles which are now treated as seasonal. Mini Rodini aims to make these more of a staple product. The mindset of Mini Rodini's buyers is very solution oriented, and focuses a lot on the suppliers side. There is high tolerance of production delays.

Recommendation: Fair Wear recommends Mini Rodini to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

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 2019, several audits indicated excessive overtime. Mini Rodini has discussed these findings with the factories and it turned out the production volume of Mini Rodini was not causing the overtime. Although the company did continue discussing the topic it was not able to show mitigation of root causes.

Recommendation: Mini Rodini could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, Mini Rodini could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request.

Fair Wear 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: Based on the design and estimated target volume and retail price, suppliers quote a price. Buyers do not work with open costing or run a plausibility check whether the prices they pay can cover the legal minimum wage.

However, it is important to note that almost half of the total production volume comes from production locations where Mini Rodini increased prices to cover (their share) of living wage for workers. An additional 20% comes from production locations in low risk countries.

Recommendation: Fair Wear recommends Mini Rodini to expand their 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. First priority would be to make sure this level of transparency can be achieved with their suppliers.

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, Fair Wear 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, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: In 2019, one audit at a Turkish supplier indicated problems related to payment of legal minimum wage. Since then Mini Rodini has actively addressed the finding with the factory and has been assured it is solved.

Recommendation: Fair Wear strongly recommends Mini Rodini to always verify whether legal minimum wage issues have actually been resolved in case factory management claims so. Mini Rodini could hire a local consultant or plan a monitoring visit of one of Fair Wear'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: In the past financial year there was no evidence of late payments to suppliers by Mini Rodini.

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.	Advanced	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	6	6	0

Comment: Mini Rodini discusses living wage with all suppliers, asking them about the causes for wages lower than living wage. Only one supplier has been so direct as to say that prices are too low for them to pay living wages. The member assumes that this is the case for more suppliers, even if they don't mention this directly. The member company did not only develop an action plan, but has already started implementation. Basis formed the wage calculation sheets to calculate the gap between the existing wage levels and different living wage benchmarks.

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.	Advanced	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.	6	6	0

Comment: Mini Rodini pays their share of living wage at their main production location in India, and a price that covers full living wage at their main factories in Turkey and its subcontractors.

The target wage in India is a living wage that is calculated for one adult. It is based on a worker survey that Mini Rodini conducted, and extensive research into different benchmarks. The target wage in Turkey is based on the benchmark of the Turk-Is trade union, and is informed by a workers' survey conducted at the production locations. It is based on the assumption that a family consisting of two working adults together providing for two children. In both cases, the extra money needed is absorbed by the profit margin and the total extra amount needed was calculated using the figures of the production department.

At the Indian supplier where Mini Rodini pays the living wage factor, the member struggled with the unpredictability of the extra costs, caused by discrepancies between packing lists and orders. To address this, all pieces were marked up with 6% and this percentage will stay the same into the future. This percentage was chosen because in previous calculations the average mark-up margin was between 5-7% higher than the original price. In this way, the member aims to make the living wage strategy more sustainable, as the financial department will know from the start the exact extra costs to budget for.

Likewise, Mini Rodini also needed to adapt the pay-out of the living wage factor at the Turkish factories. Initially, the premiums were added to worker's wage slips as an "LW Premium". To add the cost onto the buyers' FOB price, calculations were made on what the added margin per season would be, adding on the additional calculated costs of what was needed to arrive at the living wage levels for the three wage groups. The main supplier then added this margin onto each piece. However, this led to the unpredictability of the budget. Combined with the heavy currency fluctuation that led to the member heavily overpaying, it forced Mini Rodini to adapt. The amount that covers the living wage premiums is now sent in one invoice, without the margin being added to each piece. To make the costs more predictable, the sums will be paid in the same way twice or four times per year to the supplier, while workers will continue to receive the living wage each month.

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.	42%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	4	6	0

Comment: Mini Rodini pays living wage at one of their main factories in Turkey and its six subcontractors and their main production location in India, totalling 42% of their total FOB volume. Because in Turkey the member increased the prices to cover the full living wage, in 28% of Mini Rodini's supply chain workers earn a living wage.

Purchasing Practices

Possible Points: 50

Earned Points: 40

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.	22%	
% of production volume where Fair Wear audits took place.	54%	
% of production volume where an audit took place.	73%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	21%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.g. (N/A = no production in low risk countries.)
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 Mini Rodini's supplier base, FWF requires the member to ensure it audits all production locations that are responsible for over 2% of production and production locations where Mini Rodini is responsible for over 10% of the location's production capacity.	
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 Fair Wear 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 Sustainability Manager - who is part of Mini Rodini's production team - is designated to follow up on problems identified by monitoring system

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 Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear 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: Fair Wear 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: Mini Rodini could show that audit reports were shared with suppliers on time, and improvement timelines were set in a timely manner.

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	Fair Wear 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: Mini Rodini has had a shift in staff, which affected the follow-up of Corrective Action Plans. However, during the performance check it was clear that the company managed to keep track of and contribute to basic progress on the Corrective Action Plans.

Recommendation: Fair Wear encourages Mini Rodini 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.	31%	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.	2	4	0

Comment: Mini Rodini aims to visit all its production locations every year. However, in 2019, the company was not able to visit production locations in China.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

Comment: Mini Rodini collected external audit reports for different production locations but did not assess the quality or implemented corrective actions. Also due to travel restrictions.

Recommendation: Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the Fair Wear audit quality tool and corrective actions are implemented.

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 Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	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.	5	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	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: Mini Rodini's supplier sourcing and due diligence policy includes an abrasive blasting policy that is shared with suppliers. The company does not create designs that need abrasive blasting for their looks. Mini Rodini makes use of other denim finishing processes such as laser and stone washing. These facilities are visited and a health and safety check is included in these visits.

With over one third of the total FOB placed in Turkey, Turkey is the largest production country for Mini Rodini. The member has a clear policy for Syrian refugees in Turkey. This is shared and monitored with both relevant agents and suppliers and always discussed during visits. All production locations in Turkey, including subcontractors, have been audited by Fair Wear. One production location employs two Syrian workers, and Mini Rodini makes sure that there is no discrimination. The audit showed that a required health and safety training was conducted in Turkish only. To ensure that the Syrian workers are also aware of health and safety issues, the training has been repeated in Arabic. Mini Rodini enrolled four Turkish suppliers into the WEP Factory Dialogue module, which gives an introduction on how effective communication can be a tool for problem solving.

The company is aware of the basic risks in their other production countries China and India and addresses these as part of the regular due diligence process.

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: There is active cooperation with several Fair Wear members.

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.	100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

Member undertakes additional activities to monitor suppliers.: Yes (1)

Comment: All locations in low risk countries were visited and have posted the worker information sheet and returned the suppliers questionnaire. Mini Rodini also asks the different wage levels of these suppliers and has collected external audit reports.

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	Fair Wear 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 Fair Wear and recent Audit Reports.	N/A	2	0

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	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear 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	Fair Wear 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 Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear 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.	No licensees	Fair Wear 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: 30

Earned Points: 21

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.	1	
Number of worker complaints resolved since last check.	1	

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 Fair Wear 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 Sustainability Manager is appointed to address 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 Fair Wear 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: Mini Rodini could demonstrate that all production locations have the Worker Information Sheets posted. Mini Rodini distributes worker information cards to workers during visits, putting them in canteens and other accessible places.

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.	50%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Mini Rodini enrolled two Chinese and one Turkish suppliers into the Fair Wear Workplace Education Programme, which raises awareness about the eight labour standards and the Fair Wear complaints helpline, which together account for 50% of Mini Rodini's production volume in high risk countries.

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 Fair Wear 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: 7

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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: Mini Rodini organises an annual CSR conference for all employees in which general sustainability discussions are held, and performance check results are shared. Mini Rodini's CSR guide includes Fair Wear information is handed out to new employees.

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 Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: Mini Rodini's sustainability manager is part of the production team. Before buyers plan a factory visit, the sustainability manager shares information and specific points for attention during a meeting. Often the buyer and sustainability manager visit suppliers together. When suppliers are evaluated by the production team, logistics and warehouse staff can also give input.

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, Fair Wear audit findings.	2	2	0

Comment: In China, the agent always accompanies Mini Rodini on visit. As the factory management does not speak English, the agent communicates with them, and discusses follow up on the CAP. The agent is very solution-oriented. The agents in Turkey also follow up on the CAP issues.

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.	25%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Mini Rodini enrolled four Turkish production locations, including two subcontractors, into the WEP Factory Dialogue module, collectively accounting for 49% of Mini Rodini's production volume in high risk countries. These trainings are counted for half of the FOB value.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	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.	N/A	2	0

Comment: The reports on the WEP Factory Dialogue module for Turkey did not include recommendations how the member could follow up on these trainings.

Recommendation: Fair Wear recommends Mini Rodini 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. Mini Rodini 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: 9

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: Each CMT location is visited regularly, by either Mini Rodini staff or agents. Some non CMT locations are visited as well. During those visits, it is checked if the needed material is present at the location and Mini Rodini ensures to be aware of the production processes of each factory, to double check potential subcontracting.

Mini Rodini has a subcontractor policy and agrees with suppliers that subcontractors can be used as long as they are already included in Mini Rodini's monitoring. The process stipulates that the member should be informed when more volume is placed at these subcontractors than initially foreseen.

During the performance check it turned out the company had difficulty linking specific FOB or specific production to specific subcontractors.

Recommendation: Fair Wear recommends Mini Rodini to adjust its systems in such a way that production volume can more easily linked to a specific production location.

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: Production staff and the Sustainability Manager travel usually together to factories. Frequent briefs and updates are given and the relevant staff is involved in the evaluation of each supplier.

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	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: Mini Rodini communicates about Fair Wear and this communication is in line with our communication guidelines.

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 Fair Wear'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: Mini Rodini publishes the brand performance check on its website. There are internal discussions about disclosing the supplier list to the public. Until now this has not been done.

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 Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: Mini Rodini submitted the social report to Fair Wear and published it on their website.

Transparency

Possible Points: 6

Earned Points: 5

7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Evaluation of Fair Wear membership is conducted throughout the year, with top management being involved. CSR is discussed a lot in the management team and it is key for Mini Rodini's founder and Board.

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.	0%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear 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 the previous performance check Fair Wear required Mini Rodini to ensure it audits all production locations that are responsible for over 2% of production and production locations where Mini Rodini is responsible for over 10% of the location's production capacity. This requirement still holds.

Evaluation

Possible Points: 6

Earned Points: 0

Recommendations to Fair Wear

The system is difficult to manage, where to find things

When it comes to living wage it is difficult to find out what is exactly needed

How do we ensure workers are actually paid a living wage, how can we include it in our price and do not have to take responsibility for other customers

More awareness with consumers about Fair Wear, so they understand better what it means.

More awareness also with other stakeholders about Fair Wear

More joined communication towards consumers, where Fair Wear is project coordinated

Scoring Overview

Category	Earned	Possible
Purchasing Practices	40	50
Monitoring and Remediation	21	30
Complaints Handling	7	9
Training and Capacity Building	9	11
Information Management	4	7
Transparency	5	6
Evaluation	0	6
Totals:	86	119

Benchmarking Score (earned points divided by possible points)

72

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

10-09-2020

Conducted by:

Anne van Lakerveld

Interviews with:

Songul Can - Head of Buying Assortment & Production

Ozlem Umdu - CSR coordinator