



Brand Performance Check

Mini Rodini AB

Publication date: July 2021

This report covers the evaluation period 01-01-2020 to 31-12-2020

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.

This years' report covers the response of our members and the impact on their supply chain due to the Covid-19 pandemic which started in 2020. The outbreak of the Covid-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

Brand Performance Check Overview

Mini Rodini AB

Evaluation Period: 01-01-2020 to 31-12-2020

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	86%
Benchmarking score	78
Category	Leader

Summary:

Mini Rodini has met most of Fair Wear's performance requirements. Its monitoring percentage of 86% consists of Fair Wear audits, external audit reports and the fact that the company fulfilled monitoring requirements for production in low-risk countries. The benchmark score of 78 together with the monitoring percentage means the brand returns to the 'Leader' category.

Corona Addendum:

As part of Mini Rodini's production comes from China, the company was quite early informed about the risks regarding COVID-19 and already postponed all travel to China in January 2020. Following the first signs of the pandemic, the brand took a very proactive approach. It reached out to all production locations indicating it needed to assess future orders and requesting information regarding the status of running orders. At the same time, Mini Rodini evaluated its projected sales, which is mainly business to business. Based on the evaluation of running orders and projected sales, the brand decided to reduce specific orders while assuring payment for all materials and already incurred suppliers' costs. From July onwards, sales picked up again, and production was able to grow back to normal.

Between March and June, all employees at Head Quarters worked 60%, and temporary contracts were not renewed, resulting in an understaffing for most of 2020, also on CSR.

Throughout 2020, Mini Rodini kept in close contact with all production locations, although it experienced technical difficulties in communication with the Chinese locations. In Turkey, the local Sustainability Coordinator regularly checked in with factory management and visited when possible. In May, the brand sent out a questionnaire to all suppliers asking for more information about health and safety measures in the production locations, stability of worker's payments and stability of orders. It provided support when needed, such as prepayment of materials and adjusted production planning. The brand kept in close contact with factories and customers, sharing information throughout the year, keeping everyone updated on progress. Throughout the pandemic, the brand made sure to 'leave no one behind'. At the end of 2020, it has been successful, as all suppliers are still in business and producing for Mini Rodini, and the brand maintained its customer base.

Living Wage is a central theme in Mini Rodini's Sustainability approach. Since 2016, the brand contributes to higher wages at their production location in India. Since 2018, the brand also contributes to a living wage at one of their main suppliers and their subcontractors in Turkey. Throughout 2020, the brand was able to uphold this commitment.

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.	58%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

Comment: 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 2020, the percentage of production volume from production locations where Mini Rodini buys at least 10% of the production capacity decreased from 78% to 58%, mainly because of reduced orders at two production locations in China.

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.	6%	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 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.	64%	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. In 2020, the percentage of production volume from production locations where a business relationship exists for at least five years slightly decreased from 70% to 64%.

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: Mini Rodini started production at two new production locations in 2020. For both the questionnaire was 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: 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 unauthorised 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.

In 2020, Mini Rodini made sure to regularly reach out to all production locations to check on how business was going and whether they needed anything. In China, they asked a local consultant to visit some production locations. The process with the new Chinese production location had already started prior and followed the regular procedure. In Turkey, Mini Rodini's Sustainability Coordinator visited when possible, including the new production location. In addition, it asked all production locations to fill out a brief questionnaire asking about the health and safety measures, continuous payment of wages and whether they had any reduced orders. These questionnaires indicated all locations had taken measures to ensure workers' health and safety. Some locations had experienced order losses and some locations indicated they did not pay workers during lockdown when the factory was closed.

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: Mini Rodini has a systematic supplier evaluation system that combines production location compliance with the Code of Labour Practices, focussing on for example wages, overtime, health & safety and worker awareness/representation, with production performance indicators. The results from the supplier evaluation leads to decisions on what and where to place production. Mini Rodini aims to support suppliers that show engagement and willingness to improve labour conditions and recognise that the company might need to increase the volumes at a supplier in order to increase its influence to change the labour conditions.

In March 2020, Mini Rodini sent a letter to all production locations indicating that they expected a reduction in orders and wanted to get an update on all orders. Input from suppliers on the status of orders, combined with an assessment from the sales department determined which orders were reduced or cancelled.

Mini Rodini paid for all materials and other costs production locations had already incurred. Throughout the year, Mini Rodini also placed orders at production locations that experienced a reduction in orders from other customers. In addition, some production locations asked for pre-payments, especially when material suppliers were asking for cash payments. Mini Rodini supported production locations with these pre-payments.

Throughout the year, the company has put the sustainability and well-being of the entire supply chain as its priority. Mini Rodini indicated it felt that if suppliers were doing well, the company would be doing well.

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, also because it is part of the company's sourcing strategy to avoid too much interdependency.

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 minimises 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. 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.

In 2020, Mini Rodini was sure to keep in close contact with all production locations to monitor production progress. When a delay was expected it was immediately communicated to the wholesale customers, who were generally understanding of the situation. Mini Rodini did not put any pressure on production locations.

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: 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. Excessive overtime is a priority topic in discussion with production locations, and is also given specific attention when Mini Rodini starts producing at a new production location. The company also recognises the fact that it is a very difficult finding to remediate.

Recommendation: Fair Wear recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours. In addition, the company can consider placing orders in low season, when possible.

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 25% comes from production locations in low risk countries.

Also, Mini Rodini is aware of the effect of COVID-19 on the prices, such as reduced capacity and efficiency and is looking out for price changes because of it.

Recommendation: Mini Rodini is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown to enable them to do a plausibility check.

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.	No problems reported/no audits	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.	N/A	0	-2

Comment: Mini Rodini did a survey with all production locations to gather information on the effect of COVID-19. Two factories in China indicated they would not pay workers when they were in lockdown. Mini Rodini checked on this finding and received a response that lockdown was during workers' absence because of Chinese New Year and the brand was assured production and wages were not affected by lockdowns in the end.

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: Mini Rodini did not delay any payments to its suppliers.

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 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 has already started implementation. The basis for implementation has been 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. At the end of 2020, the brand also started discussion wage increases at another Turkish production location, where other Fair Wear members are also active.

The goal 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 living wage estimates. The goal in Turkey is based on the estimate 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 provide 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 based on an average mark-up from previous calculations. 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 adapted the pay-out of the living wage factor at the Turkish factories. 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.

Mini Rodini was able to maintain its additional payouts throughout 2020.

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.	52%	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 five subcontractors and contributes to higher wages at their main production location in India, totalling 52% of their FOB volume (excluding low risk).

Purchasing Practices

Possible Points: 52

Earned Points: 42

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	61%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	25%	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.)
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:	86%	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. In 2020, Mini Rodini did not have a Sustainability Manager for seven months. During this time the Sustainability Coordinator and Head of Production and Assortment were stepping in.

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.	No	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.	-1	2	-1

Comment: Due to changes in staff and limited resources because of COVID-19, two audit reports that took place in 2020 were not shared with factories upon receipt, but only when the new Sustainability Manager joined.

Requirement: Mini Rodini is required to share and discuss the audit report and CAP findings with the factory within 2 months. A reasonable time frame should be specified for resolving findings. In case worker representation is applicable, the CAP should be shared with worker representative as well as involved in setting the time-frame for realising improvements.

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	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.	6	8	-2

Comment: Mini Rodini has had a shift in staff, which affected the follow-up of Corrective Action Plans as mentioned under 2.3. However, because of COVID-19, the company was in regular contact with all production locations and addressed ad hoc problems as they arose. The company was able to show that it accommodated production delays due to lockdowns and acted when factories indicated they needed pre-payments for orders.

Recommendation: Fair Wear encourages Mini Rodini to continue strengthening their system to keep track of findings and 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.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

Comment: As travel was restricted due to the Covid-19 pandemic, this indicator is not applicable in 2020 for all Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	2	3	0

Comment: Mini Rodini collected external audit reports for different production locations and assessed the quality, but due to different priorities due to COVID-19 did not implement corrective actions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Advanced result on all relevant policies	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.	6	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

Comment: In 2020, Mini Rodini did not produce any denim products.

With over almost half 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.

Around 20% of Mini Rodini's production comes from China. The company is aware of the main problems in China, specifically related to excessive overtime and forced labour in certain provinces. They are also aware of the way most Chinese factory managers communicate about this. In the communication with their main Chinese production locations, Mini Rodini relies on its Swedish agent for information.

For all production locations Mini Rodini actively monitored COVID-19 related risks following Fair Wear guidelines, during regular calls and through a questionnaire. All factories provided health and safety measures for workers and complied with local regulations regarding quarantine. In Turkey, the government covered 60% of the salary costs during lockdowns. Mini Rodini was able to verify that all workers were paid 100% during that time. In the questionnaire Mini Rodini sent out, Chinese locations indicated they would not pay their workers during lockdown (as they pay piece rate and no pieces were made). Mini Rodini checked on this finding and received a response that lockdown was during workers' absence because of Chinese New Year and the brand was assured production and wages were not affected by lockdowns in the end.

Mini Rodini works with one production location in India. They are aware of the main risks in the country, such as gender based violence, and closely monitored the situation at this specific factory during 2020.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

Comment: None of the active CAPs is from a production location that is shared with other 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 production locations in low risk countries were visited in the last three years 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. Throughout 2020, Mini Rodini actively engaged with all production locations to check in on the situation regarding COVID-19 and to discuss possibilities to support.

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: 24

Earned Points: 18

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	3	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	2	
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. In the absence of the Sustainability Manager, the Sustainability Coordinator and Head of Product and Assortment addressed 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. Because of travel restrictions in 2020, Mini Rodini had a meeting with a group of workers from their main production location in Turkey, to get information about their situation in general, on wages and related to COVID-19. The company tried to organise something similar for India, but there it was difficult to get access to workers.

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.	9%	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 one Chinese and one Turkish supplier 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 9% of Mini Rodini's production volume (excluding production in low-risk countries).

Recommendation: Fair Wear recommends Mini Rodini to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. Mini Rodini should ensure good quality systematic training of workers and management on these topics. To this end, Mini Rodini can either use Fair Wear's WEP Basic module, or implement training related to the Fair Wear CoLP and complaint helpline through third-party 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
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

Comment: Mini Rodini received three complaints in 2020, one in India and two in Turkey. The Indian complaint was related to health and safety violations and corresponding unfair dismissal. The complaints in Turkey were at the same production location, one related to misbehaviour of administrative staff and one related to overtime. The company addressed all complaints in accordance with the Fair Wear Complaints Procedure. Two complaints were resolved in 2020, the other one was resolved prior to the performance check. However, it was decided that there will be a training at the location in Turkey to make sure a similar situation will not occur. Mini Rodini has not taken preventive steps at other production locations.

Recommendation: It is recommended to uncover the root causes of complaints and prevent them from recurring. When appropriate, the investigation includes incidents at other factories.

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 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.	2	2	0

Comment: Mini Rodini cooperated with other Fair Wear members in addressing the Turkish complaints at a shared supplier.

Complaints Handling

Possible Points: 17

Earned Points: 12

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's CSR guide includes Fair Wear information is handed out to new employees. Due to COVID-19, there were no additional activities to share information about Fair Wear with all staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement 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. Information on suppliers was shared in the team when visits were not possible. 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, Mini Rodini works with a Swedish agent. 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.

Recommendation: As Mini Rodini delegates CAP follow up and monitoring to agents, it should inform them about the Fair Wear COVID-19 guidance and ensure agents are enabled to monitor the impact of COVID-19 on suppliers.

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.	14%	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.	2	6	0

Comment: Five Turkish production locations, including two subcontractors, have been enrolled in the WEP Factory Dialogue module, collectively accounting for 27% of Mini Rodini's production volume in high risk countries. These trainings are counted for half of the FOB value.

Recommendation: For the capacity building in China, Fair Wear recommends to participate in the ILO Score module Workplace Cooperation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No follow-up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	0	2	0

Comment: Mini Rodini did not follow up on the advanced trainings.

Requirement: Fair Wear requires Mini Rodini to discuss the outcome of advanced training with their supplier and agree on next steps such as regular dialogue or committee meetings.

Recommendation: Fair Wear recommends members to discuss outcomes of factory dialogue sessions with 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: 13

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: 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. In 2020, Mini Rodini had a local Sustainability Coordinator in Turkey to check-in with factories and visit when possible to closely monitor the process.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Comment: Production staff and the Sustainability Manager frequently update each other on each supplier.

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	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 the communication guidelines.

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 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.	2	2	0

Comment: Mini Rodini has disclosed 76-99% of production locations through Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with 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: 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 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.	No requirements were included in previous Check	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.	N/A	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. Due to COVID-19 this requirement has been considered non applicable.

Evaluation

Possible Points: 2

Earned Points: 2

Recommendations to Fair Wear

Mini Rodini provided the following recommendations to Fair Wear:

- Please provide more guidance on where to start, especially on more systemic problems where there is no clear solution.
- There should be more differentiation in evaluation based on member specifics.
- Fair Wear puts too much focus on documentation. Mini Rodini is more interested in moving and acting.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	42	52
Monitoring and Remediation	18	24
Complaints Handling	12	17
Training and Capacity Building	7	13
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	94	121

Benchmarking Score (earned points divided by possible points)

78

Performance Benchmarking Category

Leader

Brand Performance Check details

Date of Brand Performance Check:

01-06-2021

Conducted by:

Anne van Lakerveld

Interviews with:

Songul Can - Head of Production and Assortment

Elin Linden - Sustainability Manager

Ozlem Sahbaz Umdu - Sustainability Coordinator

Emeli Stenqvist - Wholesale Manager