

Brand Performance Check MANROOF GmbH

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.

On COVID-19

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

MANROOF GmbH

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

| Member company information | |
|--|--|
| Headquarters: | Zürich , Switzerland |
| Member since: | 2008-01-01 |
| Product types: | Promotional wear and accessories; Bags |
| Production in countries where Fair Wear is active: | China, India, Turkey |
| Production in other countries: | Austria, Germany, Greece, Italy, Portugal, Slovenia, Switzerland |
| Basic requirements | |
| Workplan and projected production location data for upcoming year have been submitted? | Yes |
| Actual production location data for evaluation period was submitted? | Yes |
| Membership fee has been paid? | Yes |
| Scoring overview | |
| % of own production under monitoring | 93% |
| Benchmarking score | 60 |
| Category | Good |

Summary:

Manroof has met most of Fair Wear's performance requirements. With a benchmark score of 60 points, Manroof find itself again this year in the 'Good' category. Despite the COVID-19 pandemic, Manroof has an impressive monitoring threshold of 93% which far exceeds the needed 80%, for a member in its third year of Fair Wear membership and beyond.

Corona Addendum:

The COVID-19 pandemic had a significant impact on the 2020 business year at Manroof, but despite the major disruption, Manroof came out of the year quite well. At the start of the pandemic, it seemed as if the economy would shut down completely. However, since Manroof had large orders for banners and other materials used in political campaigning and that these campaigns were still happening despite COVID-19, Manroof realised a turnover equal to what it had in 2019.

The company did not enter into furlough and kept its full staff capacity throughout 2020. As it does not rely on retail shops, Manroof stayed clear of the impacts of the lock-downs in the retail sector. Manroof also does not use online sales channels. All orders are produced on a project by project basis, except a few basic items kept on stock in Switzerland for immediate delivery.

Manroof did not cancel any orders. There was a small reduction of orders to certain suppliers. However, this was compensated by placing more orders with new suppliers producing different product groups, such as banners and lunchboxes. Manroof usually pays orders in advance. All orders were paid in full and on time in 2020 as well.

Manroof is working with local freelance CSR representatives in China, India, and Turkey. Its Chinese representative was in Germany during the pandemic and therefore could not operate locally by conducting visits. Manroof did not have a strong and systematic approach to monitoring its suppliers during 2020 when onsite visits primarily could not happen. The brand made phone calls to all suppliers in April to discuss occupational health and safety (OHS) issues, including the wage and the potential job loss situation for workers. It identified some issues, and Manroof offered to support if needed. In one instance, a factory had to close down operation for two months and later relocate to a cheaper location. During that time, workers did not receive their salary. Although Manroof followed up with the factory and provided suggestions, it did not find itself in a position to help. The brand did a follow-up call in December 2020.

Manroof was still able to visit its suppliers in Turkey and India via the local CSR representatives. It kept in contact by phone and email with its Chinese suppliers, but for the rest, it did not use alternative monitoring tools to follow up, cross-check or gain additional information.

Despite the pandemic, Manroof continued its work on paying living wages. At its biggest supplier in China, the brand was already paying 50% of its share towards a living wages with the factory paying the other 50%. In 2020 Manroof's share increased to 75% of the wage gap, demonstrating strong commitment.

Manroof is a small trading company with just eight employees, and for this reason, it managed to stay agile and adapt quickly to the changing needs and circumstances throughout the crises. Flexibility is an integral part of the company's DNA and its way of conducting business when producing more than 300 different products. By being flexible, Manroof was able to quickly start producing face masks or community masks and help fill the growing need for these products. Manroof helped its largest supplier in China by sending face masks from Switzerland to workers, at a time when masks could be purchased in China due to the massive global demand.

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. | 52% | Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes. | Supplier information provided by member company. | 3 | 4 | 0 |

Comment: Manroof has one key supplier in China that is responsible for 49% of its total production volume.

At two suppliers Manroof buys at least 10% of their production capacity. This amounts to 52% of Manroof's total production volume. It is significant drop from last year where this number was 66%.

Recommendation: Fair Wear recommends Manroof to continue consolidating its supplier base where possible, and increase leverage at its main production locations to effectively request improvements of working conditions.

| 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. | 13% | 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. | 2 | 4 | 0 |

Comment: 13% of Manroof's production volume comes from locations where it buys less than two percent of its total production volume. This is the case for 24 out of 29 of Manroof's active suppliers in 2020.

Manroof produces more than 300 different product types to be able to offer a "full package" to its customers. As the products are very different, Manroof needs different suppliers for each product. Manroof is aware that a relatively long "tailend" is not ideal when it comes to having influence on the social standards at suppliers, and that it increases the administrative burden significantly. However Manroof does not see a way to decrease the number of suppliers further. Manroof does aim to keep the current number of suppliers, and this aim is explicitly formulated in the companies written sourcing strategy.

| 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. | 62% | 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: Manroof has a long-term relationship of at least five year with 14 out of 28 suppliers. This amounts to 62% of its production volume. This is a significant drop from 78% in 2019.

Yet another Chinese supplier ended up closing the factory due to COVID-19 and this put an unavoidable stop to the business relationship.

Manroof's decision to onboard seven new suppliers in 2020 was based on market needs and an adaptation strategy. The onboarding process will discussed in detail in indicator 1.4.

| 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: All questionnaires were uploaded in Fair Wears data management system. During the performance check it was verified for the two new Chinese suppliers, that the questionnaires were signed and returned prior to placing the first bulk orders.

| 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. | Insufficient | 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. | 0 | 4 | 0 |

Comment: Manroof has developed a risk map for all specific sourcing countries outside the EU and one generally for EU countries. The risk map scores the countries from 1-10 on how their comply with the Fair Wear Code of Labour Practices (CoLP). The map further outlines specific country risks according to Fair Wear country studies and the past experience of Manroof.

For new production locations in countries with a high risk-profile, Manroof prefers to select suppliers that have already been audited e.g. by BSCI or that are certified by Fairtrade, GOTS, or SA8000. These audits and certifications give Manroof a general impression of the social compliance of a factory. Manroof learned that it facilitates better collaboration on implementation of the CoLP if the supplier is already familiar with the concept of social audits. As part of the selection process Manroof requests basic supplier information like the number of workers, production processes and a list of other clients. When production volume increases at a new supplier, Manroof will plan a visit, and when the production volume goes beyond 50.000 Euros, Manroof request a social audit. The CEO has the final say regarding sourcing decisions. These decisions are influenced by the compliance of new suppliers in regards to the CoLP.

Most of Manroof's production is split between China and Europe. Manroof prefers because working conditions are relatively good, and China is seen as the second best option being more industrialised and the risk of social non-compliance is lower compared to most other Asian countries. In order to be able to meet short delivery times Manroof also produces a small portion of its production volume at two suppliers in Turkey. Some production takes place in India and Manroof has set up the supply chain this way to ensure stable deliveries during Chinese New Year and also to have a sufficient supply of Fairtrade certified production.

Manroof used the Fair Wear country studies to identify country-specific risks. Manroof demonstrated to be aware of most general country-specific risks in China, India, and Italy. This information is informally shared among relevant staff members.

During 2020 a total of seven new production facilities were added. Two of these were located in China, and Manroof could show the collected existing audit reports from these two supplier, along with other certificates. The audit showed findings related to excessive overtime, among other findings. Manroof was not able to visit these production facilities due to COVID-19 travel restrictions, and unfortunately its local CSR representative was stuck in Germany during the height of the pandemic, and was also unable to visit suppliers.

As a response for increased demand for Swiss-made products, Manroof started up with two new suppliers in Switzerland. Both of these were visited by Manroof's CEO in 2020.

In Portugal two new suppliers were added due to the demand for high-quality lanyards. Due to delivery times up to 12 months and the COVID-19 travel restrictions, Manroof did not visit this supplier.

Finally Manroof began collaboration with a supplier in Greece which ended up constituting no less than 30% of its total purchasing volume. Manroofs CEO personally visited this supplier in early 2020, prior to the travel restrictions.

During the performance check, it was not demonstrated sufficiently how Manroof followed up on COVID-19 specific country risks and how these were linked to, and followed up, at its suppliers.

Requirement: Members are required to conduct a risk assessment of the impact of COVID-19 on its suppliers, identifying the most urgent issues per supplier.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|--|---|-------|-----|-----|
| 1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner. | No | A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking. | Documentation of systemic approach: rating systems, checklists, databases, etc. | 0 | 2 | 0 |

Comment: Corrective Action Plans (CAPs) are seen by Manroof as a systematic approach to evaluating suppliers. While CAPs do provide insight into selected issues, they do not provide the type of systematic evaluation required in this indicator. CAPs will only highlight issues that become apparent in the three-year audit cycle, A systematic evaluation would provide broader insight and look into a wide range of preset criteria which in turn should lead to sourcing decisions. A such evaluation system is not yet in place at Manroof.

During COVID-19 there was no close or systematic follow up with Manroofs suppliers regarding the impacts of the pandemic. Manroof was in contact with its suppliers and did COVID-19 related follow-up questions via phone. This happened twice in 2020 - once in April and one more time in December.

There were no cancellation of orders on the part of Manroof in 2020. Manroof did place less orders with existing suppliers, but more orders with new suppliers. It also mentioned, cancellations done by other clients at its main Chinese supplier as one of the issue discussed highlighted. Sourcing decisions were not made unilaterally.

Manroof ended a supplier relationship in India and in China. A responsible exit-strategy was followed in accordance with the Fair Wear guidance, and with Manroof's leverage being less than one percent, the impact on the workers were negligible. One supplier in China closed down due to COVID-19.

During the check-in calls with its suppliers in April and December, Manroof checked if financial support was needed, but the answer to this question was "no" from all suppliers. Manroof did not collect evidence during the follow-up conversations and no production decisions were taken as a result of the suppliers feedback. Manroof also did not collect salary information to see if workers were receiving their regular wages during lock-downs, but asked about this during the calls with suppliers.

In one instance, a Chinese factory had to close down for several months due to a large drop in sales of about 80%. Workers contracts were kept valid, but no wages were paid during the lock-down and workers were free to take up temporary employment elsewhere. The factory opened up again in a new and cheaper location and the workers were offered one weeks salary as compensation. Suggestion by Manroof's external CSR consultant was not followed due to lack of resources available to the factory. The factory did state to have checked that workers were OK during the lock-down, but no evidence was requested to support that.

In general Manroof relied on, and trusted the information given to them by its suppliers without collecting additional evidence to support. The score of zero point is given mainly based on the lack of this evidence as well as the lack of an overall evaluation system other than relying on the CAPs. The absence of a systematic evaluation system inevitable enhances the risk of violations during an unprecedented and extraordinary period like the COVID-19 pandemic turned out to be.

Requirement: A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that Manroof consistently evaluates the entire supplier base and includes information into decision-making procedures.

The member should frequently communicate with its suppliers about the impact of the COVID-19 crisis. Manroof should check whether other clients have cancelled orders and what kind of support suppliers need.

Recommendation: Fair Wear strongly recommends Manroof to collect evidence from its suppliers to demonstrate that workers are receiving at least legal minimum wage during times of a lockdown. Collecting evidence should not be seen as not trusting the supplier, but rather as a part of a solid risk-based approach to strengthen it approach to remediation on areas of the utmost importance. Payment of legal minimum wage at all times are one of these important areas where evidence is needed.

| 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: Manroof decides on lead times together with its suppliers. Lead times are usually four to six weeks. Manroof keeps two of its basic products on stock in Switzerland, allowing these products to be delivered instantly. Manroof knows roughly the number of minutes needed to produce its different products. It tries to place stable orders with as big quantities as possible with its main suppliers. Reordering preferably takes place from the same suppliers to avoid duplication in development. As Manroof is producing promotional articles, the orders it receives are not stable. Clients may want something different every year and Manroof has no direct influence on this. To deal with this aspect of uncertainty, Manroof strives to set up a partnership with a relatively large client that would be able to place more stable and long-term orders.

Manroof asks its clients to place orders as early as possible to avoid creating pressure on its suppliers and sees it as its responsibility to work actively with clients to avoid last minute changes in design that could prolong the lead times. Furthermore, it informs its clients that changes made after the confirmation of the order will result in longer lead times. When unforeseeable delays in production happen, Manroof tries to find a solution by discussing the problem with the client. Sometimes this results in alternative shipping methods, such as, train- or airfreight, or ultimately in the client agreeing to a later delivery date. The costs for this kind of solutions are covered by Manroof.

A recent development is the focus for Manroof on increasing production capacity in Europe and its proximity, which will shorten lead times and make the company less dependent on China, where overtime remains a massive problem.

During COVID-19 Manroof benefited from its new supplier being based in Greece, where orders could be transported by truck and thereby avoiding delays due to lockdowns. Manroof are accepting any delays in delivery times stated by the suppliers and very rarely needs its goods quicker than the offered delivery time. Since there is no year planning, Manroof remains flexible and can accommodate its suppliers, even in the time of a crises.

Although being more of an ad-hoc type of planning due to the nature of the order flow, Fair Wear sees the system as strong and integrated in its implementation.

| 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: Audits conducted at Manroofs factories in China during 2020, revealed several overtime findings. Even with the influence of the pandemic which slowed down orders and generally made deliveries less urgent, excessive overtime was still a major problem.

One audit finding indicated overtime from 60 hours all the way up to 90 working hours per week. This excessive overtime finding was addressed with the factory by Manroofs external CSR Consultant and by sending prof of attendance in the months that followed, Manroof was able to verify that the working hours had come under control by the factory and was now within 60 hours per week, which although still high, is often the norm in Chinese factories.

Another audit revealed a finding of attendance records missing, which made it impossible to verify actual working hours. The issue was that the factory was only registering the in and out time in the morning and evening and was not registering workers lunch break correctly. As follow-up the factory sent new attendance record for a following month as proof of improvement.

Recommendation: Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Manroof to actively take measures when excessive overtime is found. Taking measures to ensure that Manroof knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|--------------|---|--|-------|-----|-----|
| 1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations. | Intermediate | Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages. | Interviews with production staff, documents related to member's pricing policy and system, buying contracts. | 2 | 4 | 0 |

Comment: In order to be able to compare prices, Manroof sends order requests to several suppliers. When the clients' target price is lower than the price Manroof receives, the supplier sometimes uses cheaper materials to hit the lower price-point. Sample orders are usually free for Manroof, but it does pay for transportation. In case Manroof does not approve the quality delivered, it asks for price discounts.

Manroof works with one agent and does not have an agreement with this agent that ensures that prices allow payment of at least the legal minimum wage.

Two main suppliers disclosed their wage data to Manroof. Based on this data, Manroof calculated that on average 25% of the product price is used to cover for the labour cost component. Manroof knows roughly how many minutes are needed to produce its different products, but has not yet calculated the labour minute costs.

In light of COVID-19, Fair Wear finds that more could have been done under this indicator. There were no conversations with suppliers related to the added costs that would potentially follow when implementing the additional occupational health & safety (OHS) measures. Fair Wear expects its members to at least know how COVID-19 restrictions and OHS measures would have affected production prices and check how it would link to workers wages. This would be the only way of knowing if a potential adjustment in its buying prices should at least be discussed.

Requirement: The member should engage in a dialogue with the supplier about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into their prices.

| 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 | 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. | -2 | 0 | -2 |

Comment: One of its Chinese factories had to close down for several months due to a large drop in sales of about 80%. Workers contracts were kept valid, but no wages were paid during the lock-down and workers were free to take up temporary employment elsewhere.

The factory opened up again in a new and cheaper location and the workers were offered one weeks salary as compensation. As a result workers were not receiving their legal minimum wage for the duration of the closure. Manroof did reach out to the supplier via Manroof's external CSR consultant, but no solution was find to cover workers wages, which the factory said it was not able to afford. Support was offered, but the factory said that increased orders were the best support it could received. Manroof did not have a lot of orders for the product group produced at the factory and could therefore not increase production, but the factory is the preferred supplier of Manroof this the specific product group.

Manroof has a leverage of < 10 % in this factory.

Requirement: During COVID-19 the member is expected to thoroughly check with its suppliers whether they foresee any issues with payment of wages.

| Performance indicators Resu | ult | Relevance of Indicator | Documentation | Score | Max | Min |
|--|-----|---|---|-------|-----|-----|
| 1.10 Evidence of late payments to suppliers by member company. | | 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: Manroof is prepaying most of its orders already prior to the pandemic. No discounts or reduced prices were negotiated in 2020.

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

Comment: Manroof is addressing the topic of living wage with at least two of its suppliers. Manroof has maintained its involvement in these two factories, but has not expanded its approach further as a result of COVID-19, which has made it difficult to bring the issue of living wages up when talking with suppliers.

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

| 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. | Intermediate | Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach. | Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc. | 2 | 6 | 0 |

Comment: At Manroofs biggest supplier in China significant steps have been taken towards paying its share of a living wage. The gap was calculated between what workers were earning and the living wage estimate stated by the Global Living Wage Coalition (a.k.a Anker Methodology). This gap was adjusted to Manroofs share of the production in the factory, and it was agreed that Manroof would pay 50% of the gap in 2019. In 2020 Manroof's share was increased to 75%. As a direct result, workers would receive a salary increase of 2,5 percent. The goal is to move Manroof's share to cover the full 100% in the coming year.

At another supplier in China living wages are being paid in accordance with the estimate set using the Anker Methodology.

At the remaining suppliers of Manroof the leverage is either too small, or the business relationship to brief / order volume too unstable to really start serious efforts to implement living wages.

| 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. | 80% | 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. | 6 | 6 | 0 |

Comment: Manroof has made significant progress in financing target wages at its key supplier. At Manroofs biggest supplier in China where more than 50% of the brands total production volume is being purchased, Manroof is paying 75% of the wage gap up to a living wage. At another Chinese supplier where Manroof buys two percent of its total production volume, workers are receiving living wages already.

Rounded up the total overall percentage comes to 80%, excluding low risk production volume.

Purchasing Practices

Possible Points: 52

Earned Points: 29

2. Monitoring and Remediation

| Basic measurements | Result | Comments |
|--|--------|--|
| % of production volume where an audit took place. | 56% | |
| % of production volume where monitoring requirements for low-risk countries are fulfilled. | 37% | 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. | Yes | |
| Total monitoring threshold: | 93% | 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: In 2020 Manroof is working with external CSR consultants in China, India and Turkey. These consultants work on the follow up on problems identified by the monitoring system. For the suppliers in other countries, Manroof's CEO is responsible for the follow up.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--|---|-----------------------------------|-------|-----|-----|
| 2.2 Quality of own auditing system meets FWF standards. | Member makes use of FWF audits and/or external audits only | In case 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 |

Comment: Member makes use of Fair Wear audits and/or external audits only.

| 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: Audit reports and Corrective Action Plans (CAPs) findings are shared on time with factory management. Manroof divides the CAP findings into relatively easy issues and more complex issues in terms of follow-up. For the relatively easy issues deadlines are set with the suppliers. No worker representatives were active at the audited factories in 2020.

Recommendation: Before an audit takes place, Manroof is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritisation of issues.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------------|---|--|-------|-----|-----|
| 2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems. | Insufficient | 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. | -2 | 8 | -2 |

Comment: Manroof's external CSR consultants are responsible for monitoring the follow-up of the Corrective Action Plans in China, Turkey and India. They share proof of improvements with Manroof and update the CAP reports and the remediation status of the issues. Manroof stores the evidence (photos, emails, documents) on its server.

In 2020 very little was done on the part of Manroof to identify COVID-19 related impacts in its supply chain, and therefore it could not be sufficiently demonstrate that these issues had in fact been remediated. The follow up with suppliers took place in the form of phone calls and according to Manroof, only the cancellation of orders from other clients was reported as an issue by its main manufacturing site. Manroof offered its support, which was stated as being "not needed", but did not take steps to ask for evidence. This step would have verified if workers were still receiving legal minimum wage or if the COVID-19 measures on limiting the spread of the pandemic within its factories had been implemented.

Recommendation: Fair Wear recommends that where applicable, Manroof document meaningful efforts to facilitate resolving similar problems in the rest of the supply chain.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|----------------|--|---|-------|-----|-----|
| 2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year. | 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 | O |

Comment: Due to COVID-19 this indicator is non-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: Audit reports from Amfori/BSCI, Smeta, GOTS, and SA8000 are collected by Manroof. The quality of the reports is assessed using Fair Wear's audit quality assessment tool, and the findings are used by Manroof to get a general impression about the working conditions at its suppliers.

Recommendation: Fair Wear recommends Manroof to systematically follow up on CAP findings when collecting external audit reports and document improvements made on these findings.

| 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. | 1 | 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 | Intermediate | | | 3 | 6 | -2 |
| Other risks specific to the member's supply chain are addressed by its monitoring system | Insufficient | | | -2 | 6 | -2 |

Comment: Manroof is in overall aware of the risks in its production countries and has made a risk map were these risks are listed.

Turkey:

In 2020, Manroof was able to monitor its two suppliers in Turkey via its external CSR representative. Manroof has a very small leverage of around 1% at both of these suppliers. Manroof has since last year, developed and implemented a policy on Syrian refugees working at Turkish garment factories. Through its local representative Manroof is well aware of the situation in Turkey.

For India, also here Manroof is working with an external CSR representative who was in contact with the supplier and able to follow up on the CAPs. There was an audit conducted in November of 2020, which showed that most issues had been remediated and that the factory is complying with the Governmental regulation on COVID-19. Manroof checked up on the payment of workers during the one month lock-down, and was told that workers were receiving their regular wages. Manroof was however not able to show proof of this in terms of salary slips from workers.

Through its local CSR representative (and many visits in past years) Manroof is well aware of the country specific risks related to China. In the external audit reports for the new Chinese suppliers there were no mentions of COVID-19 safety measures being upheld, but also no findings related to this, so this could not be fully verified if sufficient measures had indeed been taken. The local CSR representative worked from Germany during 2020 and was therefore not able to visit the factories in person, but kept in contact with them via phone.

Regarding COVID-19 there was no systematic follow-up and also no evidence related to prove that occupational health & safety measures were sufficiently implemented at any of Manroofs suppliers. Manroof followed up twice in 2020, but it did not record the collected replies systematically. The overall message Manroof received was that its suppliers were not in need of financial support.

The Fair Wear Worker Information Videos were shared with factories, where applicable but Manroof did not follow up on how/if the factories used these videos.

Fair Wear has concluded that the efforts of Manroof in terms of identifying, managing and remediating risks related to COVID-19 were overall insufficient.

Requirement: Manroof monitoring system should identify and address high risk issues that are specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies.

Recommendation: Manroof is advised to discuss with its suppliers which support they can provide in implementing OHS measures in response to COVID-19.

Fair Wear further strongly advises Manroof to conduct systematic follow-up and track the replies received from its suppliers and collect evidence that clearly shows that wages were safe-guarded during lock-down periods and that sewerage was paid according to law if dismissals took place as a result of COVID-19.

| 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: No active CAPs to collaborate on.

| 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.: No (o)

Comment: Manroof collected the signed questionnaires and proof of the posted Worker Information Sheets (WIS) for all its suppliers in low-risk countries. In 2020, Manroof managed to visit its suppliers in Greece and Switzerland.

| 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). | Yes | 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. | 2 | 2 | 0 |

Comment: Manroof conducted an audit at one of its Chinese tail-end suppliers in 2020.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|---|--|-----------------------------|-------|-----|-----|
| 2.11 Questionnaire is sent and information is collected from external brands resold by the member company. | Yes, and member has collected necessary information | 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. | 2 | 2 | 0 |

Comment: Manroof could show the signed questionnaires from all its external producers.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|--|---|-------|-----|-----|
| 2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume). | 16% | 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. | 1 | 3 | 0 |

Comment: Three of Manroof's external producers are Fair Wear members, accounting for 16% of Manroofs external sales volume.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------------|---|---|-------|-----|-----|
| 2.13 Questionnaire is sent and information is collected from licensees. | No licensees | 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: 29

Earned Points: 12

3. Complaints Handling

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

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--------|--|--|-------|-----|-----|
| 3.1 A specific employee has been designated to address worker complaints. | Yes | Followup is a serious part of 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: Manroof's CEO is responsible to address worker complaints if any are received.

| 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: Manroof and its local consultants check during visits whether the Worker Information Sheets (WIS) are posted at accessible locations at the suppliers. Manroof could show photos of posted Worker Information Sheets during the Brand Performance Check.

Some of the checked WIS for China were in the old format (FWF Global Service) and Manroof should take care and see do that these are exchanged to the new GS visual layout.

| 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. | 79% | 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 workermanagement 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. | 6 | 6 | O |

| 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: 9

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: Fair Wear membership is discussed regularly in meetings with all staff. New employees are trained on Fair Wear membership and requested to read the social report. The benefits of ordering with Manroof should be known to all employees and so should the difference between Fair Wear and other initiatives in the field of social sustainability.

| 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: Staff in direct contact with suppliers are informed about Fair Wear requirements by emails, meetings, and documents on Manroof's server. As the team is relatively small, this is done in an informal way on an ad-hoc basis.

| 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 | 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. | 1 | 2 | 0 |

Comment: Manroof has one agent in China. This agent is supporting the awareness raising of the Fair Wear Code of Labour Practises (CoLP) on a very basic level.

Orders through this agent are relatively small and unstable, so the agent has not yet started to conduct workshops at suppliers to facilitate the improvement process. At Manroof there is a policy to intensify improvements via audits, workshops and visits at suppliers when Manroof gets a minimum of five percent leverage. For any smaller leverage, only the basics are implemented, such as the Fair Wear questionnaire with the CoLP, the Worker Information Sheet and gathering of external audit reports.

Recommendation: Manroof 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. | 0% | 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. | 0 | 6 | 0 |

Comment: No capacity building training to support transformative processes were done in 2020.

Recommendation: Fair Wear recommends Manroof to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioral change and long-term structures to improve working conditions. To this end, members can make use of Fair Wear's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. Fair Wear guidance on good quality training is available on the Member Hub.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|---|--|---|--|-------|-----|-----|
| 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 | o |

Training and Capacity Building

Possible Points: 11

Earned Points: 4

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: Manroof uses the Fair Wear questionnaire, as well as asking for a list with names, addresses and products from all its suppliers to find out whether production is being subcontracted. It actively checks production facilities and capacity during on-site visits.

In 2020, Manroofs local CSR team in India and Turkey were still able to conduct factory visits, while in China, no visits were possible because the local CSR representative was in Germany during COVID-19. The use of external CSR consultants is an asset to Manroof as it helps keeping track of its supplier base and thereby reduce the risk of unauthorised subcontracting.

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

Comment: For each supplier, Manroof stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails, in an informal way.

Information Management

Possible Points: 7

Earned Points: 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: Manroof communicates extensively about Fair Wear on its website as well as via brochures and on social media.

| Performance indicators | Result | Relevance of Indicator | Documentation | Score | Max | Min |
|--|---|---|--|-------|-----|-----|
| 6.2 Member company engages in advanced reporting activities. | Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency. | Good reporting by members helps to ensure the transparency of 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: On the website of Manroof (www.manroof.ch) links to Fair Wear's website and has the most recent performance check report, social report, member confirmation letter, a brochure and relevant Fair Wear country studies available for download.

Manroof discloses all production facilities internally to other Fair Wear members.

| 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: Manroof has a made a comprehensive social report that gives a good and accurate description of the companies CSR efforts of 2020. The social report is shared on Manroof's 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: Fair Wear membership is evaluated by the CEO and other relevant staff. This is done in an informal and ad-hoc way. Supplier feedback is taken into account in these evaluations. The performance check report is used to set priorities for the year ahead.

| 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. | 100% | 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. | 4 | 4 | -2 |

Comment: Manroof had made progress of 3 out of 3 recommendations given in the previous performance check.

A policy is in place for Syrian refugees related to Indicator 2.7 and monitoring requirements for low risk and tail-end have been met in 2020.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

Manroof expressed that there is a lot of information to organise and prepare before the brand performance check and is requesting further help from Fair Wear on how to prioritise this information.

A clear wish was expressed for better recognisability in Switzerland and in particular a collaboration with Swizz Fair Trade could be of great benefit.

Fair Wear was recommended to participate in local Swiss events such as "Fair Trade Town" and make it explicitly known through communication that there is a standard on social sustainability called Fair Wear and what out label actively stands for.

Scoring Overview

| Category | Earned | Possible |
|--------------------------------|--------|----------|
| Purchasing Practices | 29 | 52 |
| Monitoring and Remediation | 12 | 29 |
| Complaints Handling | 9 | 9 |
| Training and Capacity Building | 4 | 11 |
| Information Management | 7 | 7 |
| Transparency | 5 | 6 |
| Evaluation | 6 | 6 |
| Totals: | 72 | 120 |

Benchmarking Score (earned points divided by possible points)

60

Performance Benchmarking Category

Good

Brand Performance Check details

| Date of Brand Performance Check: |
|----------------------------------|
| 12-05-2021 |
| Conducted by: |
| Peter Jahns |
| Interviews with: |
| Jacques von Mandach, CEO |