

# **Brand Performance Check Mayerline NV**

**Publication date: August 2021** 

This report covers the evaluation period 01-02-2020 to 31-01-2021

#### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> 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**

## **Mayerline NV**

**Evaluation Period: 01-02-2020 to 31-01-2021** 

Member company information	
Headquarters:	Brussel , Belgium
Member since:	2010-03-14
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	China, Tunisia, Turkey
Production in other countries:	Italy, Lithuania, Pakistan, Portugal, Russian Federation
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	85%
Benchmarking score	43
Category	Needs Improvement

## **Summary:**

Mayerline NV has shown insufficient progress in performance indicators. Although it was able to maintain its monitoring percentage at 85%, the benchmarking score of 43 means Mayerline is in 'Needs Improvement'.

#### **Corona Addendum:**

Mayerline's shops were fully closed during the pandemic for three months and partly closed for six months. The company had people on an average of 60% furlough between March and June 2020. As the company's main customers are older women, sales dropped by 76% and only improved once the shops were open and general shopping circumstances improved. After the first lockdown, Mayerline improved its online presence and started to guide its customers into the online world.

When Mayerline became aware of the COVID-19 situation in China, the CEO immediately reached out to its Chinese suppliers to show support and ensure production locations there would be no pressure on delivery dates from Mayerline's side. When the pandemic hit Belgium a few months later, the Chinese suppliers returned the well-wishes. The company experienced cash flow problems and asked for a postponement in payments of all fixed costs, such as rent and taxes in Belgium. The company also reached out to suppliers to extend payments. Some agreed to extend payment terms, and others did not. Mayerline paid suppliers within the (newly) agreed timeframe. Mayerline did not cancel any orders.

Mayerline's CSR manager participated in different Fair Wear webinars on COVID-19 related risks. The CSR manager already had limited capacity before the pandemic. Due to furlough and differing priorities in the company, their capacity to address and follow up on risks was further limited. The company kept in close contact with all suppliers but mainly discussed issues related to production. The company did not check in on health and safety issues. Except for Lithuania, where the government paid workers during lockdown, Mayerline did not check if wages were paid during lockdown or factory closure.

Because of the travel restrictions, the company could not visit its production unit in Lithuania as much and had to hand over certain responsibilities to the local office. This has improved some of the internal systems, such as production planning.

## **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.	71%	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:** 71% Of Mayerline's production volume comes from production locations where it buys at least 10% of production capacity. 34% Of the total production volume is placed in low-risk countries.

Mayerline's financial year that is assessed runs from February 2019 to end of January 2020.

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.	5%	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:** 5% of the production volume comes from locations where Mayerline buys less than 2% of its total FOB.

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.	67%	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:** Mayerline prefers to work in long-term relationships. It has a steady and long term relationship with suppliers that takes up 67% of its production volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	2nd years + member and no new production locations selected	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	N/A	2	O

Comment: Mayerline did not start with new production locations in 2020.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: Mayerline conducts risk assessments for potential new sourcing countries. It's important to Mayerline to check the risks in the garment supply chain before it engages with a supplier in that country. This exercise is meant to assess which risks can be expected and whether Mayerline would be able to manage these. For countries where Fair Wear is active, the country study provides the most information. If that is not available, the member uses the Risk Checker of MVO-Platform. If the member concludes it won't be able to manage, the conclusion is that no production will be started in that country. For this reason, Myanmar, Ethiopia, and Uzbekistan have fallen off Mayerline's radar.

The decision of on-boarding a new supplier is a joint responsibility of the Head of Product and the CSR Manager. The Head of Product takes the lead in the decision about whether on-boarding a new supplier is necessary and acceptable, based on production necessities. After the Head of Product has expressed its desire to add a new factory, the case is handed over to the CSR Manager who needs to give a final go.

A new supplier will only be accepted when 1. There is a clear need to add a new production location. 2. The factory information sheet is completed. This includes the production processes that are being done in-house. 3. The management of the new factory has signed the Fair Wear Code of Labour Practices. 4. The Worker Information Sheet is posted on the work floor. 5. A recent audit report and CAP are requested, and Mayerline assesses the state of progress. 6. When special risks are applicable, Mayerline asks the supplier to sign a letter of guarantee, which is a way to make suppliers aware of these risks. For example regarding the Sumangali Scheme in India. 7. The supplier has disclosed information about tier 2 suppliers and these suppliers have signed the Fair Wear CoLP and posted the Worker Information Sheet.

During the performance check Mayerline was able to show that the company has integrated its due diligence system as part of the supply management system.

In 2020, Mayerline's CSR manager participated in several Fair Wear webinars on COVID-19 related risks. The company did not translate this information into more specific due diligence activities. As such, Mayerline did not monitor risks specifically related to COVID-19.

**Recommendation:** The member is recommended to have frequent meetings with its suppliers to check areas of risk and closely monitor the COVID-19 situation and its challenges. To help the conversation, Mayerline could use the ETI/FW brand/supplier conversation framework that is referred to in the 'Handbook Covid-19 Lost wages and jobs series'.

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

**Comment:** Mayerline has a supplier rating system that evaluates all audit reports by all labour standards. The evaluation is shared with the responsible buyers to be discussed with the suppliers. At the moment the rating system has not led to production decisions yet.

Mayerline kept in close contact with all production locations to monitor the production process. It did not cancel any orders, but did allow for delays, because Mayerline's shops were closed.

In the beginning of 2020, Mayerline recognised the risks to production due to COVID-19 and the CEO immediately reached out to all Chinese suppliers to show support and stress that Mayerline would not cancel any orders or put pressure on production. Later in the year, suppliers sent a similar message to the brand. Throughout the year the economic partnerships with suppliers have been maintained.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or adhoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

Comment: In the production process Mayerline works closely together with its main production location in Lithuania. In 2020, the company was forced to work more online and delegate responsibilities. This improved the alignment between the Lithuanian and Belgian offices and reduced the inefficiencies in the process. Throughout the production process Mayerline maintains close contact with the suppliers. In 2020, the planning was continuously adjusted based on information from factories on closures and lockdowns. Mayerline accepted late deliveries. As shops were closed there were less strict deadlines.

**Recommendation:** It is advised to establish a system for sharing and updating forecasts with suppliers to facilitate their planning. The system may include assurance of early delivery of materials and trimmings to suppliers, ensuring samples are approved in time and that late changes are discussed with the supplier.

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 production locations indicated previously that Mayerline's production planning was contributing to excessive overtime. In 2020, the company was forced to work differently, which improved the planning process. The lockdowns at different countries did not influence production much and therefore limited overtime was reported.

**Recommendation:** Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Mayerline to actively take measures when excessive overtime is found. Taking measures to ensure that Mayerline 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	O

**Comment:** Mayerline works with CMT and therefore can differentiate between material costs and the rest; overhead, labour costs, profit margin. Further differentiation is not available, and there are no suppliers with whom Mayerline works based on open costing.

Prices quoted by suppliers are accepted, and via the audit reports the member checks whether Legal Minimum Wage is paid.

**Recommendation:** Fair Wear recommends Mayerline to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. First priority would be to make sure this level of transparency can be achieved with their suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	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:** For production in Lithuania Mayerline was informed that workers received unemployment contribution for at least legal minimum wage. Mayerline did not verify whether workers received at least legal minimum wage during lockdowns or factory closure in other countries, although information provided by Fair Wear has indicated this was a high risk.

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

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

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:** As stores were closed, Mayerline had cashflow problems. The company asked for postponement of payments of fixed costs in Belgium such as rent and taxes and also asked for an extension of payment terms from suppliers. Some suppliers agreed to extending payment terms and others did not. Mayerline paid suppliers within the (newly) agreed timeframe.

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

**Comment:** Mayerline has neither assessed nor responded to root causes for wages that are lower than living wages in production locations. Suppliers are hesitant to share details on what they are paying to workers.

**Requirement:** Mayerline must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. Mayerline is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

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	O

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** Mayerline has not determined and financed wage increases yet.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	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.	0	6	O

**Comment:** Based on available information, none of Mayerline's production locations pay living wage.

# **Purchasing Practices**

**Possible Points: 50** 

**Earned Points: 17** 

# 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	53%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	32%	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	audits all production locations	supplier base, Fair Wear requires the member to ensure it is that are responsible for over 2% of production and layerline is responsible for over 10% of the location's
Total monitoring threshold:	85%	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 CSR manager is the end responsible and gets informed by the Lithuanian and Chinese Quality Control staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case 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 Corrective Action Plans were active during the previous year	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.	N/A	2	-1

Comment: In the past financial year, none of the production locations was audited.

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:** Due to a lack of resources Mayerline has not been able to follow-up on Corrective Action Plans or remediate findings related to COVID-19.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

Resolving and remediating non-compliances is one of the most important criteria member companies can do towards improving working conditions. Fair Wear expects Mayerline to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

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, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

**Comment:** Mayerline collects external audit reports and assesses the quality as part of the on-boarding and due diligence process. In 2019, Mayerline could show follow-up on the external audit reports, which means these count towards the monitoring threshold. As the company did not add new production locations in 2020 and had limited resources available for monitoring and remediation the company did not add any new external audit reports for 2020.

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.	2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	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:** Mayerline sources jeans only from their Tunisian supplier that has been audited by Fair Wear in the past. The Head of Products has worked with this facility for over 20 years. Mayerline has a policy that sandblasting is forbidden, which is part of the quality manual that suppliers receive. Alternative methods that are used are chemicals and sandpaper. Mayerline checks that PPEs are used and the processes are taking place in open and well-ventilated spaces.

Mayerline sources from one production locations in Turkey (9% of FOB). The supplier was sent information about the Fair Wear Turkey policy regarding Syrian workers. The CSR manager visited the production location and discussed the topic of Syrian refugees as well. In addition, the importance of transparency of production locations was discussed and monitored. As the Turkish suppliers have not received any trainings, full points cannot be awarded.

Mayerline keeps up to date on general risks in all its production countries. For India and Italy specifically the company has a document outlining the highest generic risks. These documents have been shared and discussed with the production location and signed to make sure the supplier understands and cooperates to prevent issues related to these risks.

Due to a lack of resources Mayerline was not able to properly address COVID-19 related risks related to health & safety and workers' wages.

**Requirement:** Mayerline needs to address the most urgent issues first, following its prioritisation of COVID-19 issues in collaboration with suppliers. Eventually, the member should show additional steps to remediate all COVID-19 related issues.

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:** Mayerline did not have active CAPs and does not share production locations with other Fair Wear brands.

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.	95%	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:** 34% of the total production volume is placed in low risk countries, spread over six suppliers. All suppliers have returned a signed questionnaire and posted the worker information sheet. Mayerline has visited five production locations in the past three years. This means that for 87% of the production in low-risk countries the monitoring requirements are fulfilled.

One production location in Lithuania has also been audited.

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

**Comment:** Mayerline has not audited all production locations where it buys over 2% of total FOB or where it is responsible for more than 10% of production and therefore this indicator does not apply.

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: 22** 

**Earned Points: 8** 

# 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:** Mayerline has a designated staff member that follows-up and addresses 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:** For all production locations Mayerline was able to show worker information sheets were posted.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	0%	After informing workers and management of the 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.	0	6	0

**Comment:** None of Mayerline's production locations participated in WEP training or other activities to raise awareness among workers and management on the Fair Wear Code of Labour Practices and complaints helpline.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the 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: 3** 

## 4. Training and Capacity Building

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

**Comment:** The CSR Manager has meetings with Lithuanian and Chinese QC and with CEO and Head of Products. While staff knows about Fair Wear membership, Mayerline recognises that knowledge can be enhanced and aims to organise training for all staff, conducted by the CSR manager.

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:** The Lithuanian and Chinese QC and Head of Products are informed by the CSR manager, and procedures are written down.

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:** Mayerline works with different agents. They have been informed about Fair Wear's Code of Labour Practices.

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:** Suppliers have not been enrolled in training that supports transformative processes.

**Recommendation:** Fair Wear recommends Mayerline to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural and structural change to improve working conditions. To this end, Mayerline can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

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

# **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:** Mayerline knows all production locations and explaining the importance of transparency on production locations. None of the audits or visits indicated unknown subcontractors.

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:** Top management is updated when there are severe problems. The CSR manager has monthly meetings with the Head of Production and has had regular calls with QC staff in Lithuania and China to inform them about all steps they need to take to monitor production locations.

# **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:** Information about Fair Wear membership is shared in catalogues and brochures and during company presentation. After Mayerline had to remove communication from its website it did not put information back up.

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:** Mayerline has signed the Transparency Pledge and is planning to its factory list in 2021.

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:** Mayerline plans to publish its social report on the website in August.

# **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:** The CSR manager has a quarterly meeting with the mother company on CSR performance of Mayerline. In these meetings, the vision for the direction of CSR is discussed. The outcome of these meetings is to continue the sustainability activities and deepen the efforts. Meetings with the CEO have mostly been focused on how to improve procedures.

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.	20%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

**Comment:** Mayerline received several requirements in the past performance check. Most are still not addressed. The company did manage to improve its planning system.

**Recommendation:** Although the member was not able to execute the requirements included in the previous performance check due to the COVID-19 pandemic, the member should resort to following up on these requirements when the situation allows.

# **Evaluation**

**Possible Points: 6** 

**Earned Points: 4** 

## **Recommendations to Fair Wear**

Mayerline recommends Fair Wear to support the company with training to better integrate CSR in the company and to help to organise all the information that is available.

# **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	17	50
Monitoring and Remediation	8	22
Complaints Handling	3	9
Training and Capacity Building	4	11
Information Management	7	7
Transparency	5	6
Evaluation	4	6
Totals:	48	111

Benchmarking Score (earned points divided by possible points)

43

**Performance Benchmarking Category** 

Needs Improvement

### **Brand Performance Check details**

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U	ate	OT	Brand	Perrorma	ince Check:

12-07-2021

Conducted by:

Anne van Lakerveld

Interviews with:

Mimi Lamote - CEO Isabel De Rocker - head of production Mayerline Belgium Valerie Geluykens - CSR manager Gintare Malinauskiene - general manager Mayerline Lithuanian Office (MLI) Lolita Kitkauskiene - production Mayerline Lithuanian Office (MLI)