



Brand Performance Check

Mammut Sports Group AG

Publication date: September 2022

This report covers the evaluation period 01-01-2021 to 31-12-2021

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 www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

This year's 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 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

Mammut Sports Group AG

Evaluation Period: 01-01-2021 to 31-12-2021

Member company information	
Headquarters:	Seon , Switzerland
Member since:	2008-09-25
Product types:	Outdoor products, Sports and activewear, Bags
Production in countries where Fair Wear is active:	Bangladesh, China, India, Myanmar, North Macedonia, Romania, Turkey, Viet Nam
Production in other countries:	Germany, Latvia, Lithuania, Philippines, Taiwan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	88%
Benchmarking score	61
Category	Good

Summary:

Mammut Sports Group AG (Mammut) has met most of Fair Wear's performance requirements. With a score of 61 points, Mammut is placed in the Good category. The brand monitored 88% of its suppliers.

Corona Addendum:

At the beginning of 2021, Mammut was bought by a new owner Telemos. In the time leading up to the sale, the company had a reorganisation and after the sale, the company adjusted its strategy. In the new strategy, the company decided to create more focus on its collection, especially mountaineering products. Related to this, the company also decided to create a more focused supply chain, focusing on core suppliers for each of the product groups.

In 2021, Mammut continued to monitor its production locations through regular e-mail and telephone contact and some audits and visits. In the summer of 2021, Vietnam experienced a lockdown, which highly impacted Mammut's production as 51% of FOB comes from Vietnam. Mammut stayed in close contact with production locations, especially monitoring wages at these locations. Throughout the process, Mammut stayed in close contact with other Fair Wear members and the Fair Wear country team and closely followed recommended processes. It collected information on wages and calculated possible contributions to close wage gaps. Based on experiences of other brands, Mammut decided against paying factories to close the wage gap and focused on continuing the business relationship to ensure factories could stay in business.

In 2021, Mammut was also confronted with a military coup in Myanmar. The company had already decided to stop production at one of the production locations and, due to possible legal implications, decided to phase out production at the other location as well. Although the political situation in the country sped up the process, Mammut stayed in touch with the production location and monitored the impact on workers, which was limited as the location was able to attract other orders.

Mammut focused most of its attention on Vietnam and Myanmar. However, the company was also able to maintain the basic level concerning its purchasing practices and monitoring and remediation activities. For the coming years, Fair Wear recommends Mammut to improve its approach from the basic to advanced level, especially related to wages and 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.	34%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	2	4	0

Comment: Mammut sources from 13 countries and 49 production locations. The brand has made a strategic decision not to be too dependent on one country, so ensured a more balanced spread over several countries. Its current sourcing strategy aims to increase the share of production in Europe, to spread delivery risks. Also, the brand decided to move production to bigger factories.

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.	20%	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: Mammut has reduced the total number of production locations slightly from 54 to 49. Mammut's goal remains to consolidate its supplier base in the coming years.

Recommendation: Fair Wear recommends Mammut to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Mammut should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

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.	73%	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: Mammut has been working for a long time with many of its main suppliers. The brand values these long-term relationships. These suppliers often have multiple production locations in various countries. Due to its new sourcing strategy, Mammut is moving production to new production locations but stays with the same main suppliers. Although Mammut knows the main suppliers very well, the brand will have to assess the status of working conditions at the new production locations and will have to build up new relationships with local factory management.

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

Comment: In 2021, Mammut started sourcing from two new production locations. The brand showed that the questionnaires were on file.

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

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

New suppliers selected by Mammut are assessed according to a scoring system. Senior staff explains its position with regards to labour standards and Fair Wear during visits. In 2021, Mammut staff visited the new production location in Turkey. For Vietnam, this was done by local quality control staff. Information from its general country risk assessment and Fair Wear's Health and Safety checklist is taken into account. It also collected existing audit reports. This information is included in the scoring system, which is used to decide where to produce. It is in the company's procedure that there is a limited number of people who are allowed to on-board a factory. These people have been trained on Fair Wear requirements.

In 2021, Mammut made sure to keep in close contact with all production locations and check on the local health situation. In its risk analysis the company focused on health & safety at production locations and regional lockdowns and the possible effect on production. For Vietnam specifically, Mammut cooperated with other Fair Wear members to keep up to date on the situation and explicitly monitor the wage situation.

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

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

The supplier evaluation is used as input for internal discussions with buyers when deciding on core partners as part of the new sourcing strategy. Based on the production location's evaluation and sourcing strategy, some factories were selected to be phased out over a two year period. This is communicated upfront and throughout the process they would not be allocated new designs but would be asked to use the left over materials to continue production. In 2021, one factory, when learning Mammut was phasing out, stopped production from their side.

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

Comment: Mammut has two seasonal types of products (summer and winter) and a range of Never Out of Stock-items. Lead times are between three to eight months, depending on the type of product. In 2021, lead times were extended based on supplier request, for some production locations this meant an extension of lead times from six to 14 months

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

Throughout 2021, the buyers kept in close contact with production locations to monitor production planning and to accommodate any problems. Priorities were adjusted based on customer requests and the company decided to fly in certain orders to meet customer demands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient 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.	0	6	0

Comment: Excessive overtime is high on the agenda for Mammut, which is also reflected in its general sourcing strategy. Mammut recognises that it is not the only customer influencing the working hours. Therefore the company contributed greatly to Fair Wear's guidance on addressing excessive overtime in 2019, resulting in Fair Wear's Fair Working Hour Guide.

Although the company is aware of the root causes in general, it did not discuss the topic with specific production locations. For one production location, where excessive overtime has been an issue raised during the audit, Mammut realised the reason for the excessive overtime was an overall increase in demand for the products from this production location. However, while discussing that the production location should limit excessive overtime, Mammut also contributed to this increased demand.

Recommendation: In collaboration with suppliers, the member could prioritise orders based on real demand and accept extended lead times while pushing back sales meetings to allow for later delivery. Mammut can also investigate whether slowing down capacity and spreading orders over a longer period is an option. The member could also opt for splitting orders.

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

The starting price can be higher or lower than the target price. Mammut and the supplier then work towards the target price by looking at the design and material costs. Once the price is set, it remains fixed for this specific style and is not renegotiated with every order, except when wages rise.

Recommendation: Fair Wear recommends Mammut 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, for example by using the Fair Price app. The Fair Price app also enables suppliers to include any COVID-19 related costs. Mammut could consider offering training by a local representative on Fair Price to its suppliers. Such training is available in all Fair Wear countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: Following the past performance check, Mammut continued discussions with the affected production locations to monitor progress. In 2021, Vietnam was in lockdown, which highly impacted workers wages. Mammut closely monitored the wage situation in its Vietnamese factories. They closely cooperated with other Fair Wear members sourcing in Vietnam and Fair Wear country staff to be able to verify information provided by factories. In the process, it closely followed Fair Wear's guidelines. It turned out some factories were unable to provide workers with at least legal minimum wage. Mammut discussed the possibilities to contribute financially, but realised there were legal implications. Mammut therefore clearly communicated continued commitment to producing in the affected production location, ensuring workers would be able to return to work and continue to earn wages that are above legal minimum wage.

Recommendation: Mammut could help its suppliers by directing them to available local governmental support schemes that they may be eligible for.

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: Mammut paid all invoices in time.

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: Mammut collects wage data from all production locations through the audit reports. However, in 2021, Mammut did not discuss wages with production locations.

Requirement: Mammut 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. Mammut 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	0

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: In 2019, Mammut has done a wage gap analysis, comparing current mode wage levels of the sewing department of 21 factories against the local union demanded wage level or Global Living Wage Coalition estimate. In addition, the company has calculated what it would cost to raise wages to Asia Floor Wage. Since 2020, the company has not updated information about wage levels. Instead, Mammut focused on staying in business and keeping losses due to the pandemic to a minimum. Therefore it did not put any effort into developing a strategy to finance wage increases.

Recommendation: Fair Wear recommends members to integrate the financing of wage increases in its own systems, herewith committing to a long-term process that leads to sustainable implementation of 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.	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	0

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

Purchasing Practices

Possible Points: 52

Earned Points: 21

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	81%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	7%	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		
Total monitoring threshold:	88%	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 Head of Vendor is responsible for following up on issues identified by the monitoring system. This happens in close cooperation with other purchasers and technical staff.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: In 2021, Mammut had one Fair Wear audit, and it was shared with the production location in a timely manner.

Recommendation: Before an audit takes place, Mammut 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 to 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.	Basic	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

Comment: Mammut has set up a traffic light system to track social issues at suppliers based on the audit outcomes and CAPs. The brand marks those issues as red, orange or yellow. In 2021, Mammut could show continued follow-up on existing audits, but the company has not put as much effort into following up on findings as in previous years.

Because of COVID-19, the company was in regular contact with all production locations and specifically with its Vietnamese production locations. The company was able to show that it actively collected information on wages and accommodated production delays due to lockdowns.

Recommendation: Fair Wear encourages Mammut to continue strengthening its system to analyse how it might have contributed to findings, what changes it can make in its purchasing practices and how it can support in remediating findings.

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 2021.

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: Mammut regularly collects existing audit reports of other organisations, like BSCI, Sumations, Elevate or other Fair Wear brands that have their own audit system. The brand assesses the quality of the external audit and includes it in its supplier evaluation system. During the performance check, Mammut was not able to show follow-up on external audit reports from 2021.

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.	4	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Advanced			6	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	Intermediate			3	6	-2

Comment: Mammut sources 15% of its production from one Bangladeshi production location. This production locations has been audited by the Bangladesh Accord on Fire, Building and Electrical safety issues. Mammut is not a signatory to the Bangladesh Accord and therefore cannot receive full points on this indicator.

The Burmese factories (2% of production) have been audited in 2019. Mammut addressed the basic items of the Fair Wear Enhanced Monitoring Programme on Myanmar. In its social report, the brand publishes per labour standard what issues have been found in the factories and how Mammut is addressing this, including wage ladders. At the end of 2020 Mammut decided to start phasing out production at one production location in Myanmar, which was communicated at that time. Once the coup happened, Mammut decided to stop production in Myanmar completely, following Fair Wear's policy and recommendations. It finalised production and kept in close contact with the production locations throughout the process to monitor the situation for the workers. Both production locations continue to produce for other customers.

Mammut started production in Turkey in 2020. Mammut checked possible risks based on Fair Wear guidance and reached out to the other Fair Wear member sourcing from the same location. It checked on policies regarding refugees and on existing audits and trainings. It used the knowledge and experience from its first production locations when starting with a new production location in Turkey in 2021, checking information regarding refugees and subcontracting. Mammut has not developed a general internal policy outlining expectations regarding specific country risk for production in Turkey.

Mammut closely monitored all Fair Wear information on COVID-19 related risks. The company reached out to factories to gather information on local health and safety issues and preventive measures, on wage situation and on production planning issues. In its approach to address these risks the company balanced the interests of the customer, of the brand and of the factory. As such it only indirectly addressed risks for workers.

Recommendation: Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. Mammut can provide additional measures for support and integrate that into the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

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

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

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

Comment: Mammut has production at seven production locations in Latvia, Lithuania and Germany. The brand ensured that it received a signed Fair Wear questionnaire and the Code of Labour Practices was posted. Mammut collects audit reports for production locations in low-risk countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	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: Mammut does not meet the tail end requirements. Therefore, the indicator is rated n/a.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	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.	Yes, and member has information of production locations	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.	1	1	0

Comment: Mammut has one licensee, who is a Fair Wear member. They filled out the Fair Wear questionnaire and informed Mammut of the production locations.

Monitoring and Remediation

Possible Points: 27

Earned Points: 20

3. Complaints Handling

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

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

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

Recommendation: Fair Wear recommends Mammut to regularly update the Worker Information Sheets, specifically for production locations in China.

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.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

Comment: Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

Comment: In 2021, Mammut received five complaints at four factories, all related to wages and working hours, closely connected to COVID-19, such as late payment of government subsidies or required overtime to catch up on production. All complaints have been dealt with in a timely manner and four complaints have been solved in 2021.

In its complaint handling process Mammut usually includes preventative steps, however, this year, due to lack of resources Mammut was not able to analyse the complaints and take preventive steps.

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

Comment: In 2021, Mammut actively worked with other (Fair Wear) brands to resolve multiple complaints.

Complaints Handling

Possible Points: 11

Earned Points: 8

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	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.	N/A	6	0

Comment: Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

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

Comment: Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

Training and Capacity Building

Possible Points: 3

Earned Points: 3

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: Mammut has strengthened the quality department and has trained them on CSR issues. They are the eyes and ears in the factory during the production process and are closely following where production takes place. People from the Quality department are more actively involved in CSR follow-up and their input is documented in the central supplier evaluation system. In 2021, local QC staff was able to visit production locations.

In addition, the company has strengthened procedures to prevent any unauthorised subcontracting - checking prior to production, during production and after production where goods are made. However, during the FOB check as part of the Performance Check it turned out that production happened in 2021 at a subcontractor that was not yet known.

Recommendation: Fair Wear recommends Mammut to periodically check with its agents whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including 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: All relevant staff has access to audit reports and CAPs. Purchasers, quality control staff and technicians that visit suppliers are regularly updated on CAP issues and instructed by the Head of Vendor. Staff members are actively involved in discussing CAP follow-ups. Relevant feedback from Mammut's staff is included in the CAP follow-up.

Information Management

Possible Points: 7

Earned Points: 4

6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	2	2	0

Comment: Mammut publishes its production locations through the Open Apparel Registry. It has disclosed production locations responsible for 85% of FOB to other Fair Wear members and through the Fair Wear website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: Mammut published the social report on its website.

Transparency

Possible Points: 6

Earned Points: 6

7. Evaluation

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	75%	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: Mammut ensured follow-up on requirements regarding its monitoring system and CAP follow-up. It did not discuss root causes of wages below living wage with its production locations.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

Mammut recommends Fair Wear to provide clearer guidance on Higg's Facility Social and Labour Module (FSLM) and how to 'create' a CAP. It also recommends Fair Wear to more regularly update country studies, so the company can use them as input on risk assessment. In addition, Mammut indicated they would have wanted more guidance on the special situation in Vietnam. And Mammut recommends Fair Wear to ensure it aligns with other standards.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	21	52
Monitoring and Remediation	20	27
Complaints Handling	8	11
Training and Capacity Building	3	3
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	68	112

Benchmarking Score (earned points divided by possible points)

61

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

23-06-2022

Conducted by:

Anne van Lakerveld

Interviews with:

Tobias Steinegger – Sustainability Analyst

Sara Marty – Intern Corporate Responsibility

Michael Rammelsberger - Head of Supply Chain

Andreas Buchberger – Head of Buying

Michael Farnworth - Purchasing Manager Hardware