



# **Brand Performance Check**

## **Mini Rodini AB**

**Publication date: May 2023**

This report covers the evaluation period 01-01-2022 to 31-12-2022

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

# Scoring overview

Total score: 66

Possible score: 208

Benchmarking Score: 32

Performance Benchmarking Category: Needs Improvement



Sourcing strategy

53%



Identifying continuous human rights risks

27%



Responsible purchasing practices

31%



Quality and coherence of prevention and remediation system

20%



Improvement and prevention

27%



Communication, transparency and evaluation

36%

## Summary:

Mini Rodini AB (Mini Rodini) has shown insufficient progress on performance indicators. With a total benchmarking score of 32, the member is placed in the Needs Improvement category.

The member has scored insufficient on some repeated non-compliance indicators. These need to be resolved in the next performance check, or else Mini Rodini will be automatically placed in Needs Improvement.

Mini Rodini's sourcing strategy is committed to long-term relationships and consolidating its supplier base. The member increased its non-seasonal styles and NOS products to support its suppliers and be more flexible.

Mini Rodini developed a risk analysis matrix in line with the OECD requirements, focusing on different risks, including a gender lens. Mini Rodini uses this matrix to prioritise risks in its supply chain, using a traffic light system to indicate low, medium and high risks. Based on the risk scoping, Mini Rodini did a factory risk assessment for the first time in 2022. This means the member still has to work on a proper implementation and remediation system and improvement and prevention measures based on its risk assessment. The member has not adapted its monitoring approach to ensure thorough identification of potential non-compliance. Mini Rodini has not followed up sufficiently on the enhanced monitoring policy for Türkiye.

Mini Rodini continued the contributions to its living wage projects at four of its main factories in Türkiye.

Mini Rodini could show progress in some areas since the last performance check and will further increase its CSR staff. Due to the short time between the previous performance check report and this check, some topics are still ongoing or must be implemented.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for members. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

## 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.

# Company Profile Mini Rodini AB

## Member company information

Member since: 1 Jan 2016

Product types: Garments, clothing, fashion apparel and Sports & activewear

Percentage of CMT production versus support processes 87%

Percentage of FOB purchased through own or joint venture production 0%

Percentage of FOB purchased directly 52%

Percentage of FOB purchased through agents or intermediaries 62%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? Yes

Comment One CMT supplier of Mini Rodini is vertically integrated by providing knitting, dying, printing and embroidery.

FLA Member No

Number of complaints received last financial year 1

## Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes

Work Plan and projected production location data have been submitted for the current financial year? Yes

Membership fee has been paid? 1

## Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
Türkiye	13	54
China	8	26
Portugal	3	20
Lithuania	1	1

## Layer 1 Foundational system's criteria

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

**Comment & Requirement:** Mini Rodini needs to improve its Responsible Business Conduct Policy, to ensure better alignment with the OECD guidelines.

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.: Yes

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

**Comment & Requirement:** Mini Rodini discloses 92% of production locations internally through Fair Wear's information management system. Fair Wear requires Mini Rodini to disclose its subcontractors to other member brands through Fair Wear's information management system. Due to the short time between the previous performance check report and this check, this topic is still ongoing.

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes



**Comment & Requirement:** Mini Rodini discloses 92% of production locations externally on Fair Wear's transparency portal. Fair Wear requires Mini Rodini to disclose its subcontractors on Fair Wear's transparency portal. Due to the short time between the previous performance check report and this check, this topic is still ongoing.

**1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes**

## Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

**Possible Points: 90**

**Earned Points: 34**

### Indicators on Sourcing strategy

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

**Comment:** Mini Rodini has a sourcing strategy addressing influencing labour conditions. The member has 25 active suppliers. 73% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 6% of the production volume comes from suppliers where Mini Rodini buys less than 2% of its total FOB. This is an improvement compared to the previous year.

**Recommendation:** Fair Wear recommends Mini Rodini to have its sourcing strategy preferably in written form and include SMART goals.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

**Comment:** Mini Rodini has not got a formal sourcing strategy. 60% of the member's total FOB volume comes from suppliers with whom Mini Rodini has a business relationship for at least five years. The member does not commit to long-term contracts yet.

**Recommendation:** Fair Wear recommends Mini Rodini to maintain stable business relationships with suppliers. Long-term relationships give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long-term business relationships in a sourcing strategy agreed upon with top management/sourcing staff. Fair Wear recommends Mini Rodini to commit to long-term contracts.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

**Comment:** Mini Rodini conducts risk scoping and includes all risk factors (country, sector, business model, sourcing model and product). The risk scoping includes a gender lens. The member particularly looks at all Code of Labour Practices and how women are affected. Input from workers, suppliers, and stakeholders is included in the risk scoping by the information from different audits. The brand has not included its cooperation with partners for design collaborations as a business model risk in its risk scoping. The member has not adjusted its sourcing strategy based on the results of its risk scoping.

**Recommendation:** Fair Wear strongly recommends Mini Rodini to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy. The member is urged to assess the risks of working with licensees or design collaborations. Fair Wear strongly recommends Mini Rodini to adjust its sourcing based on the results of its risk scoping.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

**Comment:** It is the standard process for Mini Rodini to inform new suppliers about Fair Wear membership by sending an information package with all requirements in prior. This process has been followed for all four suppliers added last year. Additionally, the brand started a dialogue with suppliers about human rights and how the supplier and Mini Rodini can cooperate on this topic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Basic	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	2	6	0

**Comment:** Mini Rodini collects human rights information of potential new suppliers by collecting existing audit reports. If audit reports show higher risks or suppliers are reluctant to share information regarding human rights, CSR has the last say and sourcing will be adjusted. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively. Mini Rodini followed this process for the suppliers added in the last previous year.

Mini Rodini is still collecting some of the missing questionnaires from its subcontractors, due to the short time between both performance checks, these follow-ups are still ongoing.

**Recommendation:** Fair Wear recommends Mini Rodini to investigate whether an operational grievance mechanism exists. Fair Wear strongly recommends Mini Rodini to collect all missing information from subcontractors and upload it to the database.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear’s CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

**Comment:** Mini Rodini has added four new suppliers. Mini Rodini has shared information about Fair Wear’s CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted. Mini Rodini is still collecting some of the missing posted Worker Information Sheets from its subcontractors, due to the short time between both performance checks, these follow-ups are still ongoing.

**Recommendation:** Mini Rodini is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business. Fair Wear strongly recommends Mini Rodini to collect all missing information from subcontractors and upload it to the database.

## Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	Basic	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	2	6	0

**Comment:** Mini Rodini has an ad hoc approach to identifying human rights risks in its supply chain. The monitoring of the risks does not happen on a regular basis. The member has not sufficiently monitored suppliers in Türkiye, where Fair Wear has a heightened/enhanced monitoring policy.

There is a discrepancy between the monitoring outcomes and the common risks as identified in Mini Rodini's risk scoping /external sources such as Fair Wear country studies. For instance, while risks related to factories employing Syrian refugees is common in Türkiye, the monitoring tools Mini Rodini uses do not identify non-compliances on this issue. The member has not adapted its monitoring approach to ensure thorough identification of potential non-compliances.

**Recommendation:** Fair Wear recommends Mini Rodini to approach monitoring systematically, identifying the appropriate monitoring tool and frequency depending on the outcome of the risk scoping and risk assessment.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Basic	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	2	6	0

**Comment:** Mini Rodini has a basic understanding of FoA, mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are that women are more vulnerable, it is more challenging to defend their rights and they have a shared responsibility as most of the women are also responsible for the carework.

**Recommendation:** Mini Rodini is recommended to use the Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0

**Comment:** Mini Rodini has included gender in its risk scoping. The member could show it understands the basic gender risks for its sourcing countries and, for instance, identified equal wages, contracts and FoA as important risks prevalent in Türkiye.

**Recommendation:** Mini Rodini is recommended to collect gender data per factory. Examples of country-level data that the member could start collecting: Workforce composition of the garment industry, country-specific beliefs and practices related to gender, the prevalence of Gender Based Violence, provisions for maternity leave in local laws and prohibition of gender-based violence and harassment and/or sexual harassment in the workplace.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Insufficient	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	0	4	0

**Comment:** Suppliers' human rights performance is evaluated systematically every year. The CSR department evaluates by focussing on, for example, wages, overtime, health and safety, and worker awareness/representation. The outcome of this evaluation does not influence purchasing decisions. Mini Rodini has not yet shared the evaluation outcome with its suppliers and their worker representatives.

**Requirement:** Mini Rodini should consider the outcome of the evaluation of the human rights performance of its suppliers in purchasing decisions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Intermediate	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	2	4	0

**Comment:** Mini Rodini uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations in the database. To date, the member has not yet taken active preventive measures, for example, by visiting its suppliers during production in the last financial year. During the performance check, some subcontractors were still missing in the database due to the short time between both performance checks; these follow-ups are still ongoing.

**Recommendation:** Mini Rodini is recommended to use the outcomes of its human rights monitoring to prevent unauthorised subcontracting. This can mean the member ensures the supplier is visited during production for locations with a higher risk of unauthorised subcontracting. Mini Rodini is recommended to consider working with its own Quality Controllers to monitor its production takes place in the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Insufficient	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	0	4	0

**Comment:** Mini Rodini has not identified whether homework is prevalent in its sourcing countries.

**Requirement:** Mini Rodini should identify whether homeworkers and subcontracted workers are used by its suppliers and assess if there is a risk of exploitation.

## Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Insufficient	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	0	4	0

**Comment:** Mini Rodini signs framework purchase agreements with its suppliers, which form the basis of all orders and stipulate payment terms, liability and penalties. Agreements on individual orders are made separately. Although the framework agreement is accompanied by the Mini Rodini quality manual and Code of Labour Practices, the agreement itself does not support the implementation of human rights due diligence.

**Requirement:** Mini Rodini needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in their decision-making processes.	Basic	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	2	6	0

**Comment:** Mini Rodini's CSR manager shares relevant information with other departments. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

**Recommendation:** Fair Wear recommends that CSR and other relevant departments actively share information leading to coherent responsible business practices. Mini Rodini could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

**Comment:** Mini Rodini plans complete orders (fabric and products) at the same time. Lead time for fabrics, as well as consideration of national holidays, are taken into account. Delivery times are planned together with the factories. Mini Rodini does not know labour minutes per product but does discuss the suppliers' capacity because it is part of the company's sourcing strategy to avoid too much interdependency. Mini Rodini is aware that design changes in later stages can significantly impact working hours. Buyers know that a delay in responding to suppliers asking for confirmations may cause a large production delay. Mini Rodini uses a new system called "CLO" to create 3D sketches of garments to avoid pushing suppliers in case of late samples. The forecast made by Mini Rodini is flexible and focuses a lot on the supplier's side. There is a high tolerance for production delays.

In 2022, Mini Rodini kept close contact with all production locations to monitor production progress. When a delay was expected, it was immediately communicated to the wholesale customers, who showed a general understanding of the situation. Mini Rodini did not put any pressure on production locations. The member increased its NOS amounts and accepts preorders to outbalance peak seasons.

**Recommendation:** Mini Rodini could use the Fair Working Hours Guide to assess its purchasing practices and potential impact on working hours and discuss this with its suppliers. The member is encouraged to evaluate with the supplier the production process after each season and, where needed, adapt its future planning.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Insufficient	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, cost sheets including labour minutes.	0	6	0

**Comment:** Mini Rodini has a basic understanding of the wage levels at its suppliers and does not connect this understanding to its own buying prices. Mini Rodini has no insight into the labour component of its prices.

**Requirement:** Mini Rodini needs to demonstrate an understanding of the link between buying prices and wage levels to ensure its pricing allows for the payment of the legal minimum wage.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Intermediate	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	2	4	0

**Comment:** Mini Rodini has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

**Recommendation:** Fair Wear recommends Mini Rodini to enable its intermediaries to support CoLP implementation actively. The member is recommended to check if the intermediary's purchasing practices are fair and if the intermediary has adequate systems to ensure payments are made on time.



## Layer 3 Remediation and impact

**Possible Points: 96**

**Earned Points: 24**

### Indicators on Quality and coherence of prevention and remediation system

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Insufficient	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	0	6	0

**Comment:** Mini Rodini has not yet integrated the outcomes of the risk assessment on the factory level into prioritisation and follow-up programmes. Besides, the member did not audit and train its suppliers from Türkiye according to the enhanced monitoring guidance.

**Requirement:** Mini Rodini is required to ensure that prioritisation in follow-up matches the factory's risk profile. Besides, Fair Wear advises the member to follow up the enhanced monitoring guidance by auditing all its suppliers from Türkiye and enrol training, especially for the factories with Syrian workers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Insufficient	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	0	6	0

**Comment:** Mini Rodini has not yet applied a gender lens in any of its improvement and prevention programmes.

**Requirement:** Mini Rodini must start including a gender lens in the implementation of improvement or prevention actions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Insufficient	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	0	6	0

**Comment:** Mini Rodini has not yet included steps to encourage FoA and effective social dialogue in its improvement and prevention actions.

**Requirement:** Mini Rodini must include steps to promote FoA and social dialogue in its improvement or prevention actions. This should be linked with its assessment of risks to FoA and social dialogue as part of its human rights monitoring (see indicator 2.8). Examples of steps that could be included can be found in Fair Wears brand guide on FoA and collective bargaining.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Basic	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	2	6	0

**Comment:** Mini Rodini monitors the effectiveness of internal grievance mechanisms by using audit reports. However, the brand does not yet support these mechanisms through training or actively incorporating its results into improvement and prevention plans.

**Recommendation:** Fair Wear recommends Mini Rodini to always involve suppliers and worker representatives in the assessment of the internal grievance mechanism and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Intermediate	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	4	6	0

**Comment:** Mini Rodini collaborates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints and preventing human rights violation by working together towards a living wage. Mini Rodini has not yet cooperated with customers that are not Fair Wear members.

**Recommendation:** Even though Mini Rodini already works together with other Fair Wear members, Fair Wear recommends to also collaborate with other customers.

## Indicators on Improvement and prevention

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	0%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	-2	6	-2

**Comment:** In the past financial year, Mini Rodini has received one audit report. During the performance check, Mini Rodini could not demonstrate that the CAP issues requiring improvement actions have been followed up.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

Following up CAPs by implementing improvement actions is one of the most important criteria members can do to improve working conditions. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Insufficient progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	-2	6	-2

**Comment:** During the performance check, the member could not demonstrate that any CAP issues requiring preventive actions have been followed up.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

Following up CAPs by implementing preventive steps is one of the most important criteria members can do to improve working conditions. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	Basic	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	2	6	0

**Comment:** Mini Rodini has some suppliers where improvement or prevention programmes are not needed. These cover 21% of the member's total FOB. The member does not have a system to ensure possible human rights risks are regularly discussed with these suppliers. Mini Rodini irregularly reviews changes to the risk situation. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

**Recommendation:** Mini Rodini is recommended to create a systematic plan which details at which interval the member will discuss possible human rights risks at its suppliers and which human rights risks should be discussed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Basic	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	2	6	0

**Comment:** In the previous year, Mini Rodini conducted one audit where excessive overtime was mentioned in the audit report. Mini Rodini analysed the root causes of these findings. According to the member insufficient planning from the supplier is a significant cause for excessive overtime. Some of Mini Rodini's suppliers remain reluctant to be open about working hours. The member has not yet taken action to address the root causes.

**Recommendation:** Fair Wear strongly recommends Mini Rodini to address suppliers' reluctance to be transparent about working hours. With its suppliers where excessive overtime occurs, Fair Wear recommends Mini Rodini to verify whether production is planned with overtime. If production is planned with overtime, the brand should ensure that its products can be produced during regular working hours. Fair Wear advises Mini Rodini to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Intermediate	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	2	4	-2

**Comment:** In the previous year, Mini Rodini conducted one audit. The findings regarding non-payment of legally required wage were: Wages were paid later, workers were not paid during work stoppages, entitled leaves and overtime premiums were not paid then legally required, and the audit included findings regarding failure to provide wage data. Mini Rodini responded immediately to these findings by getting in contact with the supplier and working together on the CAP findings. If the supplier fails to provide consistent wage data, Mini Rodini will stop the cooperation as a final consequence.

**Recommendation:** Fair Wear strongly recommends Mini Rodini to always verify whether legal wage requirement issues have been resolved in case factory management claims so. Mini Rodini could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check remediation.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	4	6	0

**Comment:** Mini Rodini has a basic knowledge of the wage levels at its suppliers, mostly based on audit reports. Mini Rodini discusses the topic of wages with the suppliers, which are included in its living wage projects.

**Recommendation:** Fair Wear encourages Mini Rodini to discuss with all suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship. Mini Rodini should have an overview of wages paid in all its production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	4	6	0

**Comment:** Mini Rodini has set a living wage benchmark at four selected factories and finances these wage increases by paying an additional amount each year.

**Recommendation:** To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models. In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	27%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	2	6	0

**Comment:** Mini Rodini uses fact-based costing to ensure its additional contribution supports the payment of its share of a living wage estimate at suppliers responsible for 27% of Mini Rodini's FOB.

**Recommendation:** Mini Rodini is encouraged to roll out its approach to other suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	Intermediate	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	2	4	-2

**Comment:** Mini Rodini received one complaint in the past financial year about living wages at its supplier in Türkiye. The member actively responded to this complaint per Fair Wear's Complaints Procedure. Mini Rodini exchanged with the supplier and asked for the status and wage documents. The detailed list of wage levels was checked regarding discrimination of wage increases and approved by Fair Wear. The complaints handler could not be contacted any more since the business relationship between the in-house subcontractor and the supplier ended. The complaint was closed.

**Recommendation:** Mini Rodini could use the outcome of complaints to determine follow-up actions in its broader improvement and prevention plans.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Insufficient	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	0	6	0

**Comment:** The member has not yet enrolled its suppliers with findings on no awareness about CoLP and Syrian workers in the following training modules: Onboarding training and Migrant Refugee Module for Türkiye.

**Requirement:** Mini Rodini needs to implement training per the requirements in its improvement and prevention programmes, with a particular focus on the requirements of enhanced monitoring guidance. The member needs to follow up on CAP findings that show workers are not aware of the Code of Labour Practices by enrolling those suppliers in an appropriate training module.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Basic	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	2	6	0

**Comment:** Mini Rodini followed up on the implemented "FairPrice App" training by extensive exchange with the supplier and adding additional living wage contributions. The member is thinking about planning an assessment of the training outcome.

**Recommendation:** We encourage Mini Rodini to expand its follow-up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	Intermediate	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0

**Comment:** Mini Rodini's human rights risk monitoring includes a responsible exit strategy. In the past financial year, the member stopped with seven suppliers. The member followed the steps in the responsible exit strategy. Mini Rodini has discussed the responsible exit strategy with the suppliers, where the cooperation stopped. The communication took place in most cases verbally and could not be shown as written proof.

**Recommendation:** Fair Wear encourages Mini Rodini to implement a clear responsible exit strategy and ensure all relevant staff is informed about this. Please see Fair Wear's guidelines on a responsible exit strategy. Mini Rodini could discuss the responsible exit strategy with its suppliers, for instance, as part of its supplier evaluation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

**Comment:** Mini Rodini does not undertake activities beyond Fair Wear scope.

## Layer 4 External communication, outreach, learning, and evaluation

**Possible Points: 22**

**Earned Points: 8**

### Indicators on Communication, transparency and evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

**Comment:** Mini Rodini communicates about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. Through LinkedIn, brand packaging, and newsletters, Mini Rodini actively spreads the Fair Wear message.

**Recommendation:** Mini Rodini could develop materials about Fair Wear membership to share with retailers and (web)shops. The Fair Wear third-party resellers flyer can support in explaining Fair Wear, Fair Wear’s work and the communication rules for third parties.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear’s information management system, collected information about other brands’ human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

**Comment:** Mini Rodini does not sell external brands.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 Social report is submitted to Fair Wear and is published on the member company's website.	Intermediate	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	2	4	0

**Comment:** Mini Rodini has submitted its social report, which Fair Wear approved.

**Recommendation:** A social report is an important tool for member companies to share their efforts with stakeholders transparently. Therefore, Fair Wear strongly recommends that Mini Rodini publishes the social report on its website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Insufficient	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	0	4	0

**Comment:** Mini Rodini does not report on factory-level data and remediation results.

**Requirement:** Mini Rodini should report on factory-level data and remediation results. Good reporting by members helps to ensure the transparency of the member and Fair Wear's work.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

**Comment:** Mini Rodini has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. In its evaluation system, the member does not yet include triangulated information from external sources, such as workers and suppliers.

**Recommendation:** The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	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 should show documentation related to the specific requirements made in the previous Brand Performance Check.	0	4	-2

**Comment:** The previous performance check included six requirements related to onboarding new suppliers, monitoring, following up on legal minimum wage violations, implementing Fair Wear's enhanced policy for Türkiye and following up after training.

Mini Rodini followed up on one of them by conducting a FairPrice App training in 2022 at one of its suppliers in Türkiye, following-up after the training and defining the next steps. Mini Rodini started collecting the signed questionnaires from its subcontractors and checking if Worker Information Sheet is posted; due to the short time between both performance checks, these follow-ups are still ongoing.

Together, less than half of the requirements were addressed.

**Recommendation:** Mini Rodini is strongly recommended to address the requirements that are still outstanding.

## 5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Not applicable

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

## Recommendations to Fair Wear

Mini Rodini would like fewer administrative tasks and more alignment and efficiency between Fair Wear and other platforms/organisations. More clear step-by-step guidance on how to reach the requirements that Fair Wear expects from member brands would be helpful.

# Brand Performance Check details

Date of Brand Performance Check: **12-04-2023**

Conducted by: **Adele Kolos**

Interviews with: - Håkan Ström (CEO)

- Elin Lindén (Sustainability Manager)

- Nicole Peira (Assortment Manager)

- Sofie Nyström (Assortment Manager)

- Agostina Romano (Accounting)