

# Brand Performance Check Marc O'Polo AG

## **Publication date: January 2023**

This report covers the evaluation period 01-06-2021 to 31-05-2022

#### **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 <u>www.fairwear.org</u>. The online <u>Brand Performance Check Guide</u> provides more information about the indicators.

#### On COVID-19

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**

#### Marc O'Polo AG

#### Evaluation Period: 01-06-2021 to 31-05-2022

Member company information	
Headquarters:	Stephanskirchen , Germany
Member since:	2020-09-01
Product types:	Garments, clothing, fashion apparel, accessories, footwear
Production in countries where Fair Wear is active:	Bangladesh, Bulgaria, China, India, North Macedonia, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, Bosnia and Herzegovina, Italy, Madagascar, Mauritius, Portugal, Spain, Taiwan, Ukraine
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	81%
Benchmarking score	59
Category	Good

#### Summary:

Marc O'Polo has shown progress and met most of Fair Wears' performance requirements. With a benchmarking score of 59, Marc O'Polo is placed in the Good category. Although the monitoring threshold does not determine the category this year, Marc O'Polo has monitored 81% of its production volume.

#### **Corona Addendum:**

Marc O'Polo AG (Marc O'Polo) is a German fashion brand that joined Fair Wear in 2020. COVID-19 caused many difficulties for the brand, and lockdowns in Germany and its production country affected the brand operating from Germany. Marc O'Polo was able to find a balance between the loss of sales in its physical stores and the increase in sales in its webstore. The brand is aware of the changing economic climate and trying to sustain its online presence.

Because the brand could find a balance between its sales in physical stores and its online sales, Marc O'Polo did not need to cancel any orders in 2021. Marc O'Polo also started travelling to its suppliers again as soon as it was possible in 2021.

In 2021, Marc O'Polo continued expanding its human rights due diligence processes. There's a clear understanding of responsible purchasing practices and how to integrate that into the brand's human rights due diligence. The brand has created extra head count for the CSR team. Currently, Marc O'Polo has three employees working on following up on CSR-related issues. This is a significant increase since the brand joined Fair Wear in 2020.

As a result, Marc O'Polo has shown progress since last year and, with a benchmarking score of 59, is placed in the 'Good' category. Fair Wear recommends that Marc O'Polo to further amplify its due diligence by standardising more of its processes and its policy statements.

### **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.	75%	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.	4	4	0

**Comment:** Marc O'Polo sources its garments from 135 factories. The brand mainly sources from small and medium enterprises that can meet the brand's high-quality standards. Most of its production volume is sourced through agents and intermediaries, while a smaller part is sourced directly from suppliers. At around 75 of its suppliers, representing 75% of its total production volume, Marc O'Polo places significant production volumes resulting in more than 10% leverage. To calculate the leverage, Marc O'Polo requests the supplier's capacity and the total order quantity produced at that facility in that year. That number is then cross-checked with Marc O'Polo's own order system. Marc O'Polo is aware of its many suppliers and has started consolidating suppliers where it places small order volumes. The aim to consolidate Marc O'Polo's supplier base is written in its responsible sourcing guidelines.

**Recommendation:** Fair Wear recommends Marc O'Polo to consolidate its supplier base further where possible, and increase leverage at main production locations to effectively work on improvements of working conditions. Currently, it only states the brand's goal to consolidate its supplier base, not how its done. It is advised to describe the consolidation process in a sourcing strategy that is agreed upon with top management and sourcing staff.

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.	67%	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.	0	4	0

**Comment:** Marc O'Polo has a broad range of products. According to the brand, in some cases, the member needs specific suppliers to produce certain products. Nonetheless, Marc O'Polo is aware of the significant amount of suppliers. In 2021, the member went to its suppliers to discuss growth opportunities to consolidate its supplier base with them. Marc O'Polo has written its consolidation goals in its responsible sourcing guide but has yet to formulate the exact process or the departments involved in the consolidating process.

**Recommendation:** Fair Wear recommends Marc O'Polo to describe the consolidation process in its responsible sourcing guidelines. The consolidation process should be agreed upon with top management and the sourcing department.

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.	66%	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:** Marc O'Polo stated it wants to focus on long-term relationships where possible. Nonetheless, it had a significant amount of new suppliers (24) in 2021. According to the brand, it is still looking for the right balance of suppliers in the product groups. Compared to the year before (2020), the brand's relationships with production locations that have existed for at least five years remain the same, even with a decrease in total suppliers a year later.

The CSR department has a growing influence in selecting new suppliers. The Division Head CSR and Product Sustainability has a voice in setting the sourcing strategy.

**Recommendation:** Fair Wear recommends Marc O'Polo to maintain stable business relationships with suppliers. Long-term relationships support most aspects of the Code of Labour Practices and 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 that is agreed upon with top management and sourcing staff.

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, all of the new suppliers signed and returned the questionnaires. However, two suppliers out of 135 total did not return the signed questionnaires. At one factory in Taiwan, this was because the questionnaire was unavailable in the local language. However, the brand confirmed that the factory did not accept new orders from Marc O'Polo before the WIS was available. At another factory in Portugal, Marc O'Polo decided to stop the business as the factory was unwilling to sign the questionnaire.

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

**Comment:** To onboard a new supplier, Marc O'Polo looks at its country-specific risk assessment to determine possible risks. Then, the brand requires at least an active audit report from BSCI - Amfori to assess working conditions further. If this supplier 'passes' these fundamental steps, a visit is planned by the CSR Team or Buying and Production Team. If all seems feasible, the questionnaire with the Code of Labour Practices is sent to the supplier along with the workers' information sheet. The onboarding process is documented in the brand's ethical sourcing standard and responsible sourcing guidelines, which describe the adherence to its code of conduct, specific human rights, and environmental and animal welfare standards. However, this defined process in the responsible sourcing guidelines focuses mainly on new suppliers and needs to contain specifics about how due diligence occurs at current suppliers. When unknown risks are found, the brand discusses these findings with its suppliers, but it has yet to formalise a process.

The brand has stated that working conditions play a significant role in the decision-making process and focuses specifically on the supplier's willingness to cooperate if essential health and safety are no issue. In 2021, Marc O'Polo hired a consulting company to conduct country-specific risk assessments. Marc O'Polo's risk assessment is based on the consulting company's primary audit data and international labour standards. Risks are measured to standards set out by the International Labour Organisation, United Nations Guiding Principles on Business and Human Rights and other resources aligned with Fair Wear's Human Rights Due Diligence Policy. The risk tool gives an idea of the potential risks in a specific country or region and is linked to each brand's suppliers.

The buying director has the final say on whether new suppliers can be onboarded. Still, the CSR department can use a veto and has a direct line to the Chief Product Officer should there be any objections.

Since Marc O'Polo was still affected by COVID-19 in 2021, the brand documented its dialogue with its suppliers in a designated COVID-19 overview. The brand kept an overview of lockdowns, payment dates, mode of payment, production status, health and safety measures, and other notable issues. The progress of actions taken based on information from the overview is kept up to date in the same document. The brand demonstrated continuous dialogue with its suppliers throughout the year.

**Recommendation:** Fair Wear recommends Marc O'Polo to describe in more detail the processes it follows when conducting human rights due diligence, especially for existing suppliers.

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	ο

**Comment:** Marc O'Polo evaluates its supplier annually based on quality, price, logistics, service, product security and sustainability. Social compliance belongs to sustainability. Currently, social compliance evaluation is based on the audit findings (BSCI rating or Fair Wear audit findings). Social compliance represents 40% of sustainability, and sustainability covers 40% of the overall rating. The supplier evaluation is shared with the suppliers every year. The supplier evaluation, however, does currently not include an evaluation of the suppliers' compliance with the the Code of Labour Practices.

The member brand stopped business with 27 suppliers, for which it followed its responsible exit policy. In 2021, the brand stopped business with 27 suppliers with whom they do not have an existing relationship for at least five years, which means its turnover rate with new suppliers is relatively high. Marc O'Polo's responsible exit policy is formalised in the responsible sourcing guidelines document. The brand's exit policy is based on Fair Wear's responsible exit strategy, but is missing four out of six steps. The brand also stated that human rights violations should never be the sole reason to exit a supplier, as this takes away the opportunity to remediate the violation and help the worker. However, if the supplier is unwilling to solve the issue, Marc O'Polo will not hesitate to end the relationship. According to its responsible exit policy, Marc O'Polo must exhaust all other options to remediate and mitigate before exiting a supplier. If this is not feasible, the team will analyse it to determine the social impact based on leverage. The exact steps the member should follow has not been entirely written out in the responsible exit strategy.

**Recommendation:** Fair Wear encourages Marc O'Polo to develop further its evaluation system for suppliers where the CSR component goes beyond the score of an audit report, for example by including progress resolving specific (corrective) actions that were agreed upon between the brand and supplier. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Marc O'Polo is also encouraged to include a step-by-step procedure that entails the entire responsible exit process.

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:** Marc O'Polo is a fashion brand with four main collections per year, where products are delivered three times per season, meaning deliveries occur every month. The brand plans its production process by developing a critical path per product. Together with the supplier, the brand plans back from the moment of delivery to production to the delivery of material and the last date for order placement. For specific products, the brand nominates the material supplier. Forecasts are provided 3-4 months before order placement. The brand knows the total and available production capacity per supplier (in pieces) and compares this to the required capacity and lead times.

The member brand has a written agreement with all of its suppliers. The written agreement also includes the consequences for late deliveries, including penalties when a supplier fails to meet the delivery their error.

In 2021, during the COVID-19 pandemic, delivery of the members' products was disrupted due to lockdowns, factory closures, lower productivity, and late material delivery. The brand took several measures to adapt its production planning to prevent excessive overtime and ensure on-time delivery. If suppliers flagged delivery dates not being met, the brand accepted late deliveries without penalties. In several instances, the brand split orders and/or moved from boat shipment to air freight. Furthermore, for the additional orders the brand placed, no fixed delivery dates were given, but the brand discussed with the supplier what the earliest available delivery date could be.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** In 2021, Marc O'Polo had several findings of excessive overtime. According to the brand, this is mainly caused by peak and low seasons. Marc O'Polo engages with its suppliers to gather information about possible reasons for excessive overtime. To give the suppliers longer lead times, and to mitigate the peak season, the brand has extended the production period with pre-bookings of yarns and fabrics. However, the brand did not yet conduct a root cause analysis at specific suppliers structurally.

During the COVID-19 pandemic, the brand was aware of the risk of excessive overtime taking place at suppliers due to factory closures, late material deliveries and additional order placement by customers after the first lockdown period in Europe. To mitigate the risk of excessive overtime and to support suppliers, the brand took several measures. In dialogue with suppliers, the brand assessed available production capacity, sent orders without a fixed delivery date, split orders over different factories and subcontractors, was lenient with delivery dates and used air freight where needed.

**Recommendation:** Marc O'Polo could discuss with factory management the causes of excessive overtime and provide support to manage overtime. If necessary, the member could hire local experts to analyse the root cause of excessive overtime in cooperation with the supplier. Fair Wear can recommend qualified persons upon request.

Fair Wear also recommends cooperating with other customers at the factory to increase leverage when trying to mitigate excessive overtime hours. Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Marc O'Polo to take measures when excessive overtime is found actively. Taking steps to ensure that Marc O'Polo knows and shows whether excessive overtime occurs at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, document checking and interviewing workers help assess whether excessive overtime occurs.

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.	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.	0	4	0

**Comment:** Marc O'Polo can break down the cost of a garment up to the cut-make-trim level but is still missing essential components to use the labour minute costing method correctly. Because of this, the brand has started to familiarise itself with the Fair Price App through training. In 2021, Marc O'Polo planned to introduce the Fair Price App to its biggest supplier in India. However, the supplier did not have the data available (productivity, efficiency) needed to work with the App. Through the same agent that manages its biggest supplier in India, Marc O'Polo introduced the Fair Price App to a different supplier in Bangladesh. The reason Marc O'Polo involved the same agent was intending to carry the knowledge over to its biggest supplier in India, should they be ready. The brand has shown efforts to initialise working on demonstrating the link between buying prices and wage levels but has not yet been able to.

Marc O'Polo has also introduced the Fair Price App at another factory in North Macedonia.

**Requirement:** Marc O'Polo needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

**Recommendation:** At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of Fair Wear's Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

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:** In 2020, Marc O'Polo received an insufficient score for this indicator. The reason was that the brand did not systematically assess the risk of non-payment of legal minimum wages by keeping track of lockdowns, factory closures, and governmental measures and support. In 2021, Marc O'Polo created an extensive COVID-19 monitoring document that keeps track of all mentioned issues by entering a dialogue with suppliers. The brand considers the information it has in regard to COVID-19 valid because several audits verified these findings at a later stage. The audit findings from 2020 that resulted in an insufficient score for this indicator were addressed accordingly by remediating the problems alone and, where possible, with other member brands.

In 2021, however, there are new findings regarding the payment of legal minimum wage. Some of these findings were previously identified by engaging in dialogue with suppliers and are documented in the COVID-19 monitoring document. Marc O'Polo has shown that it actively follows up on those findings to remediate them within the suggested timeline. Fair Wear requested proof of three samples, which active follow-up was shown with supporting documents.

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	Ο	-1

**Comment:** In 2021. no late payments were found.

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:** Marc O'Polo started learning about factory wage levels through audit reports. However, the brand has not yet assessed the root causes for wages lower than living wages. In 2021, the brand did engage in dialogue with suppliers about missed wages due to COVID-19 lockdowns or temporarily lowered legal minimum wage.

**Requirement:** Marc O'Polo 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. Marc O'Polo 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.

Recommendation: Marc O'Polo is advised to start collecting living wage benchmarks for 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

Comment: In 2021, Marc O'Polo did not own any factories.

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:** Marc O'Polo does not yet have a strategy in place to determine and finance wage increases.

**Recommendation:** It is strongly advised that the strategy for how to finance wage increases is agreed upon by top management.

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:** Marc O'Polo has not yet set target wages with suppliers yet.

**Recommendation:** Marc O'Polo AG is strongly recommended to begin setting a target wage for its production locations.

## **Purchasing Practices**

**Possible Points: 52** 

**Earned Points: 20** 

## **2. Monitoring and Remediation**

Basic measurements	Result	Comments
% of production volume where an audit took place.	80%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	1%	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.	First or second year member and tail-end monitoring requirements do not apply	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check		
Total monitoring threshold:	81%	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 brand has created an extra head count for the CSR team. Currently, Marc O'Polo has three employees working on following up on CSR-related issues. All are actively involved in following up on corrective action plans.

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

**Comment:** Marc O'Polo makes use of Fair Wear audits and external audits only.

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

**Comment:** In 2021, Marc O'Polo shared its twelve Fair Wear audit reports and corrective action plans with its suppliers. Timelines were established promptly with factory management. The brand did not involve worker representatives systematically yet. However, clarifications about workers' committees and elected worker representatives have been actively discussed with factory management and agencies.

**Recommendation:** Before an audit takes place, Marc O'Polo is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization 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:** Marc O'Polo was able to provide supporting documents for the reviewed findings. In one case, the legal minimum wage was not paid. Based on the brand's research, it was concluded that the balance still needed to be paid out to some workers. Marc O'Polo has shown the payment of the compensation.

Besides Fair Wear corrective action plan findings, Marc O'Polo showed how it follows up on BSCI audit findings. The followup is tracked in an overview and is prioritised based on severity. The tracking includes comments on how issues are remediated, but in some cases, follow-up was done by a CSR employee onsite. For some findings, supporting documents were provided, but for others, it was lacking, making them impossible to verify.

Recommendation: Marc O'Polo should consider documenting remediation that happens onsite.

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.	56%	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.	3	4	0

**Comment:** In 2021, Marc O'Polo could visit 56% of its production sites. Due to travel restrictions, not all production sites were visited. The brand has documented the visits in an overview per department. Staff travelling keeps the CSR department informed about the presence of the workers' information sheet and the Code of Labour Practices at the factories.

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

**Comment:** Marc O'Polo mainly makes use of BSCI-reports to monitor suppliers. The brand checks the quality of the reports by using the Audit Quality Assessment Tool provided by Fair Wear. For several country-specific risks, the brand checks whether audit reports sufficiently and correctly include those risks. The member follows up on corrective actions.

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.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Bangladesh: Marc O'Polo is not a signatory of the Bangladesh Accord/RSC on Fire and Building Safety but only works with factories that are covered by the Accord/RSC or that have been audited for structural, fire and electrical safety inspection. The brand stays up to date on Fire and Building Safety by collecting reports on the subject from the supplier.

The brand is also aware of gender-related risks in Bangladesh. However, no factory is currently enrolled in the Fair Wear WEP Violence prevention training. Therefore, it is also unclear how the brand stays up to date on these risks at its facilities.

China: Marc O'Polo has a forced labour policy integrated in its Ethical Sourcing Guide. The brand is aware of the risks at its production facilities and takes action when necessary. The member has terminated business relations with two suppliers where forced labour could not be ruled out and is actively monitoring.

Turkey: The brand has several processes to identify the risk of subcontracting. As a first step, based on monitoring visits by Marc O'Polo employees, it actively checks whether the complete production process needed or the product is present in the factory. Based on the Fair Wear policy on employing Syrian refugees, the brand has created its own statement, which was shared with and signed by all suppliers. The brand also uses audits from Fair Wear and external auditors to keep track of these risks.

COVID-19: In 2021, Marc O'Polo created a COVID-19 monitoring tool that keeps track of all the issues related to COVID-19 at its factories. The COVID-19 monitoring tool includes topics regarding lockdowns, payment dates of wages, mode of payment (transfer, cash, cheques, etc.), order delays and on-site health and safety measures. In this tool, Marc O'Polo also kept track of remediation, and other actions were taken if issues arose with its suppliers.

**Recommendation:** Marc O'Polo has an extensive risk analysis which could be made more specific to emphasize on the countries where it is currently active. 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. Marc O'Polo can provide additional measures for support and integrate that in the monitoring system.

Marc O'Polo is also strongly recommended to create a policy on forced labour and share this with its suppliers.

The brand should share responsibilities with their production locations as business partners to improve workers' safety at the workplace. At the minimum, the member company should provide necessary support to the suppliers. In terms of fire and building safety, the member could offer financial or technical support, or offer flexible lead time so that factories could prioritize remediation.

Marc O'Polo should also make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. Fair Wear has extensive experience on supporting both employees and employers in setting up functional Anti-Harassment Committees. Fair Wear could provide training and regular support to suppliers upon request.

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:** In 2021, Marc O'Polo had several corrective action plans active at shared suppliers. Some carried over to 2022, but in all cases the brand has shown an effort to remediate and mititage together with other member brands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	7%	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.	1	2	0

Member undertakes additional activities to monitor suppliers.: No (o)

**Comment:** Marc O'Polo sourced from 24 suppliers in Portugal and Spain. The brand fulfilled the monitoring requirements for 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

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

**Comment:** In 2021, no external brands were resold by Marc O'Polo.

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

**Comment:** In 2021, no external brands were resold by Marc O'Polo.

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:** Marc O'Polo has four licensees. All of them completed and signed the questionnaire. In 2021, the brand collected additional information on production locations. An overview of available audit standards was shown during the brand performance check.

## **Monitoring and Remediation**

**Possible Points: 31** 

**Earned Points: 21** 

## **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.	2	
Number of worker complaints resolved since last check.	8	

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 CSR team of Marc O'Polo consists of three team members. All are actively involved in following up on 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:** Marc O'Polo has informed factory management and workers about the Fair Wear Code of Labour Practices and complaints hotline. Pictures are taken during every visit. In 2021, it showed that three suppliers out of 135 did not post the Worker Information Sheet. At one factory, this was because the Worker Information Sheet was not available in the local language. Marc O'Polo already decided to stop the business at the two other factories as they were unwilling to sign the questionnaire and post the Worker Information Sheet. For the other 132 suppliers, the photographic proof was collected and shown during the Brand Performance Check.

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 to conduct training, this indicator is not applicable in 2021. However, In 2021, Marc O'Polo organised a Workers Education Programme basic training at one of its suppliers, representing 2% of its total production volume. Additionally, another Workers Education Programme training "Violence and Harassment Prevention" was conducted at an Indian supplier in 2022, representing 7% of the total production volume, which also counts towards this indicator.

**Recommendation:** Fair Wear recommends Marc O'Polo to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. Marc O'Polo should ensure good quality systematic training of workers and management on these topics. To this end, Marc O'Polo can either use Fair Wear's WEP Basic module, or implement training related to the Fair Wear CoLP and complaint helpline through third-party training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

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

**Comment:** In 2021, Marc O'Polo received three complaints. The brand immediately remediated an excessive overtime complaint at one factory in China, and the complaint was closed by a BSCI full audit and a Fair Wear audit. At another factory in Bangladesh, there was a complaint that service benefits were not received. After a thorough document investigation by Marc O'Polo's agent, the complainants were proved correct, and the balance was paid out immediately. As a preventive measure, the factory enrolled all concerned employees in training on their rights and benefits and the grievance mechanism. This issue has not formally been closed in the financial year of 2021/2022; as for Marc O'Polo, it runs from the beginning of June until the end of May. The third and final complaint occurred in North Macedonia. Remediation is still in process.

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, Marc O'Polo received three complaints, one of which was shared with another Fair Wear member. The brand could demonstrate active cooperation, participation, and engagement with the other Fair Wear member in addressing worker 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:** At Marc O'Polo, the staff is informed about Fair Wear membership systemically. There is an internal wiki article for all employees and a confluence article on the brand performance check result. National and international retail teams are trained on Fair Wear membership, and the national and international sales departments are also. There is a separate Fair Wear membership training for buying and production and specific training on the brand performance check results.

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	Fair Wear Seminars or equivalent trainings	2	2	-1
		change within their organisations.	provided; presentations, curricula, etc.			

**Comment:** At Marc O'Polo, the staff directly in contact with suppliers receive additional training to the training mentioned in 4.1. Staff directly involved with suppliers are also trained to check for health and safety issues when onsite. In 2021, agents were enrolled in training developed and conducted by Fair Wear.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

**Comment:** Marc O'Polo also developed and conducted training specifically for agents on Fair Wear membership and the Code of Labour Practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	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 to conduct training, this indicator is not applicable in 2021. However, Marc O'Polo started WEP Violence and Harassment Prevention training at its biggest supplier in India in May 2022.

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:** No active follow-up yet for WEP Violence and Harassment Prevention training, as it was conducted at the end of the financial year. Marc O'Polo showed it started follow-up after the training report was released in the following financial year.

## **Training and Capacity Building**

**Possible Points: 5** 

**Earned Points: 5** 

## **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:** Marc O'Polo has a written procedure to monitor its production locations and the subcontractors involved. All necessary information is collected before production starts, and audit reports are collected to check for hidden subcontracting. New suppliers, including their subcontractors, are visited before the first orders are placed. In both Turkey and Italy, CSR staff travels several times per year to visit suppliers to make sure no illegal subcontracting takes place. Marc O'Polo's local quality control checks the factories for illegal subcontracting in China.

**Recommendation:** Fair Wear recommends Marc O'Polo to integrate systematic periodical checks 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:** Marc O'Polo has weekly meetings with different departments to change information about actualities at product locations. Information regarding working conditions is shared during these meetings. The Marc O'Polo's CSR team is directly linked to the Group Managers and the Management Team, should escalation be needed.

## **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:** Marc O'Polo meets the communication requirements and is in line with the Fair Wear communication guidelines.

**Recommendation:** Fair Wear recommends Marc O'Polo to communicate more actively about Fair Wear membership, the issues it finds in its supply chain and which steps the brand is taking to mitigate and remediate these issues. The brand could also consider in-store communication of Fair Wear membership.

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:** In 2021, Marc O'Polo has disclosed 93% of its suppliers to other Fair Wear members. The member published its brand performance check.

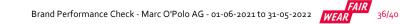
Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently 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:** A complete and accurate social report was submitted to Fair Wear and is published on Marc O'Polo's 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:** Senior management was involved and reviewed the outcome, requirements, and recommendations of the performance check. Marc O'Polo sees the Brand Performance Check as an evaluation of its performance and not the performance of its suppliers. According to Marc O'Polo, Fair Wear membership is a voluntary approach to better understanding the brand's performance on social sustainability practices.

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.	85%	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:** In total there were seven requirements. Marc O'Polo has shown sufficient improvement on most indicators but one, 1.8.

#### **Evaluation**

**Possible Points: 6** 

**Earned Points: 6** 

#### **Recommendations to Fair Wear**

Marc O'Polo suggests that the methodology/approach video should be updated as it is currently outdated. The member brand also suggests that Fair Wear gets in touch with companies like Retraced to consider the integration of systems. A more generic comment was made regarding auditors e-mailing from personal e-mails rather than Fair Wear domains. This is not always accepted by factory management.

## **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	20	52
Monitoring and Remediation	21	31
Complaints Handling	8	11
Training and Capacity Building	5	5
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	70	118

Benchmarking Score (earned points divided by possible points)

59

Performance Benchmarking Category
Good

#### **Brand Performance Check details**

Date of Brand Performance Check:

17-10-2022

Conducted by:

Jason Mandels

Interviews with:

Maximilian Böck - CEO

Susanne Schwenger - CPO Isabelle von Watzdorf - Director Buying & Production Lissa Erlenkötter - Division Head CSR and Product Sustainability Florian Nitzinger - Corporate Social Responsibility Manager Sara Strödel - Group Manager Corporate Social Responsibility Marvin Beitzel – Group Manager Supply Chain Planning Albert Fetsch - Group Manager Corporate Communications & Public Affairs Franziska Schumann - Senior Sustainability Manager