



## BRAND PERFORMANCE CHECK

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Maier Sports GmbH & Co KG

PUBLICATION DATE: AUGUST 2016

this report covers the evaluation period 01-01-2015 to 31-12-2015

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on factory conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices. They evaluate the parts of affiliate 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 factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory 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 factory 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 FWF'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 affiliate 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.

## BRAND PERFORMANCE CHECK OVERVIEW

Maier Sports GmbH & Co KG

Evaluation Period: 01-01-2015 to 31-12-2015

AFFILIATE INFORMATION	
Headquarters:	Köngen, Germany
Member since:	01-06-2011
Product types:	Sportswear, Outdoor
Production in countries where FWF is active:	Bangladesh, China, India, Turkey
Production in other countries:	Germany, Pakistan
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
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	95%
Benchmarking score	70
Category	Good

## Summary:

Maier Sports meets most of FWFs management system requirements and has 95 % of its suppliers under monitoring. This is more than the 90 % required of brands after more than 3 years of membership. With a score of 70 points, Maier Sports is in the 'good' category.

Maier Sports has a stable supplier base. It owns one factory in Turkey and has three joint ventures in China, all together accounting for 70% of FOB. The main factories have several satellite production locations in Turkey, China and Bangladesh. Furthermore, it sources products from Germany, Pakistan and India. The Indian suppliers only account for a very small part of the production, but Maier Sports values this long-term relationship and has a high leverage at these suppliers.

In 2015, Maier Sports focused on its main suppliers to improve on issues like excessive overtime, wages, and health and safety. It also invested in buying more efficient machinery for one of these suppliers. At its Turkish supplier, sufficient improvements have been made and only a few issues remain. Maier Sports has numerous small suppliers, where follow up on the FWF Code of Labour Practices was limited. It has not yet set up CAPs with its Indian suppliers. FWF recommends Maier Sports to continue working on excessive overtime and to take steps on more complex issues like freedom of association and collective bargaining. Furthermore, it should also invest in knowing what kind of human rights issues are at stake at its smaller suppliers and follow up accordingly.

In the past years, communication by Maier Sports was not always in line with the FWF Communications policy, although it did respond adequately to notifications by FWF. Maier Sports has to ensure that communication remains in line with the policy.

FWF also strongly recommends Maier Sports to include more suppliers in the WEP-training sessions to increase awareness of labour standards and the FWF worker helpline among managers and workers in its factories.

## PERFORMANCE CATEGORY OVERVIEW

**Leader:** This category is for affiliates 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 FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—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 affiliates will receive a 'Good' rating.

**Needs Improvement:** Affiliates 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. Affiliates 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:** Affiliates 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. Affiliates 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
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	86%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	4	4	0

Comment: Maier Sports has a steady supplier base. It owns one factory in Turkey and with three factories in China it has set up a Joint Venture. Those four suppliers are the core suppliers of Maier Sports and amount to about 70% of its FOB. It also works with several smaller subcontractors that are linked to these main suppliers. With almost all of its suppliers, Maier Sports has a leverage of more than 10%.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	73%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	3	4	0
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Comment: Maier Sports sources most of its products from its main suppliers. It has long term relationships with these suppliers.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0
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Comment: Maier Sports started relationships with one new Chinese supplier. Maier Sports asked this supplier to sign the Code of Labour Practices.

It also started production with a new German supplier, of whom it had received the FWF questionnaire.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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**Recommendation:** FWF recommends Maier Sports to further integrate human rights due diligence at new suppliers by ensuring that it knows the labour rights situation in the factory before placing orders. A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risks and prevent potential problems. Conducting pre-audits or analyzing existing audit reports can be a way to assess the level of working conditions before deciding to start or continue the business relationship.

**Comment:** The selection process for a new supplier is done by the CEO of Maier Sports, and most of the times in cooperation with its own factories. In China, Turkey and India, the factory or agent can propose a subcontractor that is then visited by the CEO of Maier Sports. During such introductory meetings, labour standards are discussed. Most of the times, Maier Sports asks for an existing audit report before orders are placed. Only in cases of urgency, orders are placed before an audit report has been sent. After the first orders have been placed, the CSR officer fills out the FWF Health and Safety Check upon visiting the factory.

Maier Sports is aware of labour rights issues on a country-level. Labour standards are an important part in the decision-making process, but could be further integrated in a systematic manner.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0
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**Recommendation:** FWF recommends Maier Sports to evaluate supplier compliance with the Code of Labour Practices in a more systematic manner. It should set up a system that integrates the monitoring and follow up of audit reports and the Corrective Action Plans, also so that it could be more easily shared with other responsible sourcing persons and technicians.

Furthermore, Maier Sports is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

**Comment:** Maier Sports has a systematic, yet informal approach, of evaluating supplier compliance with the FWF Code of Labour Practices. It does not have a systematic overview regarding the progress of all suppliers. It ensures and regularly checks whether the Worker Information Sheet is posted. It discusses follow up of the Corrective Action Plans at least two times a year when the CSR officer visits the factories in China and Turkey. The CSR officer makes handwritten notes about the improvements implemented by the supplier.

Due to the very small amount of orders at its Indian suppliers, Maier Sports has not audited them yet. FWF requirements are discussed by the Indian agent with its subcontractors. Feedback from these suppliers is then shared with Maier Sports.

It has no performance based system in place. Only in cases where the supplier does not make any progress to improve labour conditions, Maier Sports can decide to decrease orders.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
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**Comment:** With most of its suppliers, especially its own production in Turkey as well as its joint ventures in China, Maier Sports cooperates closely to plan production. Maier Sports has a lead time of about 18 weeks for its seasonal products and Never Out of Stock items it sources from India and China. The lead time is shorter for its Turkish supplier. Specials for customers can be delivered on a shorter notice. In the case of a customer ordering a special on a short notice, Maier Sports will shift production of Never Out of Stock-items.



Maier Sports makes forecasts and receives weekly updates regarding the production process. If suppliers highlight problems with on-time production, Maier Sports prioritizes orders, considers air-freight or allows the factory to use pre-selected subcontractors that have been registered in the FWF database. Its main suppliers are responsible for the production planning at its subcontractors. Technicians visit the factories frequently during production to consult the suppliers. This way, Maier Sports is aware of the overall capacity of suppliers. After having assessed root causes in 2014, Maier Sports sources the delivery of fabrics and accessories in an earlier stage and can place them in stock or start production 1-3 weeks earlier, to ensure that in case of delays the production is not stalled. In some cases Maier Sports asks customers to agree to flexible delivery dates for bigger resale stores, allowing production in low season.

Production for suppliers e.g. in India is not planned that closely as Maier Sports sources very little quantities there.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	3	6	0
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**Recommendation:** FWF recommends Maier Sports to continuously work to diminish excessive overtime at all its Chinese suppliers. It could implement lessons learnt from its main Chinese supplier at its other suppliers. Implementing steps to increase wages could further decrease the amount of excessive overtime. Furthermore, since it has long-term relationships with its Indian suppliers, it should assess whether excessive overtime takes place at these suppliers.

**Comment:** From the FWF audits that took place between 2013-2015, excessive overtime was found at all Chinese suppliers. Maier Sports has assessed root causes of excessive overtime at its main Chinese supplier by discussing these causes with management. The late delivery of fabrics and accessories, unannounced absence of workers, and the workers asking for more overtime hours have been identified as root causes. According to Maier Sports, these root causes are also present at the subcontractors of its main Chinese supplier. Maier Sports shifted to sourcing fabric from China and further invested in ensuring a timely delivery of fabric (1-3 weeks earlier). Next to that, Maier Sports has worked to increase productivity and efficiency. This should also ensure that excessive overtime is diminished, since the same amount of products could be made in less time. The project to increase productivity was not yet finished at the end of 2015, so it could not be verified whether it has lowered the amount of excessive overtime.

Maier Sports is not aware of excessive overtime taking place at its Indian suppliers.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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**Recommendation:** FWF recommends Maier Sports to further work on trust, and increased transparency in costing and productivity to know the real labour costs per product at its Chinese supplier. This forms the basis to ensure enough is paid to cover at least the legal minimum wage and to make steps towards living wages. Local stakeholders in India still report that unskilled workers are at times paid below legal minimum wage in the region of Mumbai. This especially concerns migrant workers. Maier Sports should ensure it is aware of wage levels at its suppliers in the region of Mumbai to know whether the legal minimum wage is being paid by its Indian suppliers.

**Comment:** At its own production site in Turkey, Maier Sports uses open cost calculation. It is aware of the total costs in the factory, including the labour costs. It has calculated the cost per minute per style, but did not yet calculate the labour minute cost. At its Chinese joint ventures, it has taken steps to implement open cost calculations, but Maier Sports encountered difficulties due to hesitancy of the Chinese partners. Maier Sports does make estimates of costs per style and is aware of wage levels in China. It also relies on FWF audits to know wage levels in China.

At its Indian suppliers, Maier Sports relies on the price given by the supplier. In general, Maier Sports feels responsible for its suppliers and works on the basis of trust and long term relationships. It does not constantly push its suppliers for a lower price, but does compare price levels and negotiates minutes per style.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2
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Comment: In 2015, two FWF audits were done, but no legal minimum wage issues were found.

1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories 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 factory and affiliate financial documents.	0	0	-1
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Comment: No late payments by Maier Sports were found in FWF audits of 2015.

1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0
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**Requirement:** Maier Sports is expected to take an active role in discussing living wages with all of its suppliers, especially at the factory it owns and its Joint Ventures. FWF holds members more accountable for implementing adequate steps when they own suppliers. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum wage, Asia Floor Wage, collective bargaining wage and industrial best practice wages are provided in the wage ladder. The wage ladder is included in FWF's audit reports. It demonstrates the gaps between workers' wages at a factory and living wages demanded by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

**Recommendation:** FWF encourages Maier Sports to discuss with suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request. FWF encourages Maier Sports to participate in the Living Wage Challenge 2016.

**Comment:** Maier Sports knows the specific costs of its factory in Turkey. With its Chinese Joint Ventures, it is working to know the specific costs. Through FWF audits, Maier Sports is aware of living wage levels. However, Maier Sport does not yet use wage ladders systematically to assess wage levels and to agree on wage targets with all its suppliers. Maier Sports tries to increase wages at its main suppliers by increasing productivity.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	70%	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 affiliate's score.	Supplier information provided by affiliate.	2	2	0

Comment: Maier Sports has an own production site in Turkey and three Chinese joint ventures. Maier Sports has increased the percentage of total production at these suppliers in 2015.

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## PURCHASING PRACTICES

Possible Points: 42

Earned Points: 31

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	95%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	0%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Total of own production under monitoring	95%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

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 FWF 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: Maier Sports has designated the CSR officer to follow up on issues identified by the monitoring system. The CEO is also involved in following up on issues, especially in India.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	4	8	-2
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Comment: In 2015, Maier Sports has worked to decrease excessive overtime at its Chinese suppliers by solving root causes and by buying more efficient machinery for one of its main suppliers. This should lead to higher wage levels at this supplier.

At its Turkish supplier, it is gradually moving towards an advanced level of CAP resolution, although issues related to living wage and freedom of association still need to be resolved. The Turkish supplier is responsible for following up at its subcontractor where several issues still remain.

Maier Sports has not yet set up CAPs with its Indian suppliers, due to the very small amount of orders. At the same time, it does visit the main Indian supplier/intermediary four times per year, has long-term relationships with them and these suppliers are highly dependent on Maier Sports.

In general, improvements are discussed with suppliers either during regular factory visits or by email.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	98%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	4	4	0
2.4 Existing audit reports from other sources are collected.	Yes and quality assessed	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	2	3	0

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented. FWF encourages Maier Sports to collect audit reports from all its suppliers to increase its awareness on human rights issues at all of its suppliers and to ensure timely follow up.

**Comment:** Maier Sports often collects other audit reports of its smaller suppliers in China and Bangladesh. In 2015, Maier Sports collected 5 BSCI audit reports: two from factories that were already FWF audited and three that had not yet been audited by FWF. Maier Sports uses the FWF Audit Quality Assessment Tool to assess the quality of the audits and to check whether all 8 labour standards are included.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF 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
2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Intermediate Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0

**Recommendation:** FWF recommends Maier Sports to identify and address issues around freedom of association and collective bargaining in China. It should take steps to include workers in decision-making on a factory level and improve worker-management communication.

Furthermore, FWF recommends Maier Sports to assess human rights risks at its Indian suppliers. It should assess whether issues like excessive overtime, the non-payment of legal minimum wage and gender based violence take place at these suppliers. FWF strongly recommends Maier Sports to enroll its Indian and Bangladeshi suppliers in the Gender Based Violence-trainings of the Workplace Education Programme.

**Comment:** Maier Sports is aware of the high human rights risks in the countries where it sources from. It knows relevant FWF country studies and policies.

More specifically, the company discussed the issue of illegally employed Syrian refugees with its Turkish supplier and visited subcontractors to assure compliance. Maier Sports is well aware of the labour force in its own factory and has checked whether Syrian refugees are employed by its subcontractors.



Furthermore, Maier Sports has checked whether its production in India is located in an area, where forced labour (Sumangali scheme) is common, which was not the case. It has not checked whether legal minimum wages are paid, and whether excessive overtime and Gender Based Violence take place. According to Maier Sports, Gender Based Violence is not a high risk at its Indian suppliers, because, among others, women are employed in high positions.

In China, it is well aware of excessive overtime and has taken steps to remediate this. Although aware of the lack of freedom of association it has not addressed this in a systematic manner.

In Bangladesh, it is well aware of the health and safety issues and that Gender Based Violence can take place in factories. It has taken several steps to address the health and safety issues.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Intermediate Capacity	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	1	3	0
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**Recommendation:** If Maier Sports continues relationships again with the Bangladeshi supplier within the foreseeable future, FWF strongly recommends that Maier Sports enrolls the factory in the Workplace Education Programme-training against Gender Based Violence.

**Comment:** Sourcing at its Bangladeshi supplier goes through its main Chinese Joint Venture who disperses orders to them. Maier Sports regularly asks for an update of the BSCI audit. The Bangladeshi supplier signed the Accord on Fire and Building Safety, participated in the Fire and Building Safety-training in 2015, but not in the WEP training on Gender Based Violence. Although Maier Sports had set-up a mid-term process (1-3 years) to work on improvements, it stopped sourcing from this factory again in 2015.

2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Information sharing	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes 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.	1	2	-1
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**Recommendation:** FWF recommends Maier Sports to more actively discuss outcomes of follow up with the other members to ensure a more coherent approach in resolving issues.

**Comment:** Maier Sports shares one Indian supplier with two more FWF members. One of these FWF members has the lead in resolving issues that came out of the audit. The members share information and Maier Sports participates in resolving issues, but there is no active discussion and cooperation between the brands to ensure a coherent approach.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	2	0
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**Recommendation:** FWF recommends Maier Sports to ask for pictures of a posted Worker Information Sheet in factories in low-risk countries.

**Comment:** Maier Sports started to source from one German supplier. It did return the questionnaire, but Maier Sports could not show that the Worker Information Sheet was posted.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

## MONITORING AND REMEDIATION

Possible Points: 32

Earned Points: 21

### 3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF 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: Maier Sports has designated the CSR officer to handle complaints.

3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0
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Comment: Maier Sports asks suppliers to send pictures of posted CoLPs and checks during visits whether the Worker Information Sheet is still posted. It regularly visits the factories.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	42%	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Factory participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme.	2	4	-2
3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	N/A	6	-2
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	-2

## COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 5

## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: Maier Sports has informed all staff about FWF membership requirements with its Maier Sports Magazin, an internal newsletter and also by posting the FWF CoLP at the company's premises.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	0
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Comment: At Maier Sports, only technicians as well as the CEO are in direct contact with suppliers. They are partly engaged to implement social standards at the production sites. They participated in the in-house training given by FWF. The CSR officer has participated in the FWF annual conference, the German stakeholder meeting, roundtables, and FWF's affiliate seminar. The CSR officer also participated in roundtables concerning the Textile Bündnis and CSR workshops.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	-2
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Recommendation: FWF recommends Maier Sports to take a more comprehensive approach to involve its Indian suppliers in implementing the FWF Code of Labour Practices. It should ensure that is aware of current issues at these suppliers and should seek cooperation with its Indian agent to resolve these issues.

**Comment:** Maier Spors has one intermediary/main supplier in India that informs subcontractors about the FWF Code of Labour Practices. At only one supplier an audit has taken place and a Corrective Action Plan was set up. At its other suppliers, implementation of the FWF Code of Labour Practices by the agent and the CEO of Maier Sports is limited to visible issues.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	9%	Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	1	6	0
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**Requirement:** Manufacturers and their workers should be systematically informed about FWF and the implementation of the Code of Labour Practices. All factory management and workers should be informed and aware about the relevant labour standards and grievance mechanisms.

Maier Sports should more actively motivate its suppliers in China, Turkey, Bangladesh and India to participate in WEP trainings. These are designed to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms, the importance of a good mechanism for communication between employers and workers in the workplace, and Gender Based Violence.

**Comment:** The Turkish factory participated in a Workplace Education Programme-training in 2015.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	N/A	4	0
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**Comment:** In 2015, Maier Sports has placed a very small order (0% of FOB) in Pakistan, which does not count towards this indicator due to the small quantity.

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## TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 5

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## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	Any improvements to supply chains require affiliates to first know all of their production locations.	Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities.	6	6	-2

**Comment:** Maier Sports has in-depth knowledge on its production sites. Suppliers and subcontractors are visited regularly by staff of Maier Sports. Its factory and joint venture can propose the use of a subcontractor to Maier Sports. After approval by Maier Sports, orders can be placed at the subcontractor. Maier Sports then works with the subcontractor to work out a production planning scheme.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	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
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**Comment:** Maier Sports informs its staff through weekly meetings and the internal newsletter. Technicians and the CEO are briefed before visiting suppliers and report back to CSR officer after they return. Staff can access audit reports and CAPs.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Communication about FWF membership adheres to the FWF communications policy	No	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.	-2	1	-2

**Requirement:** FWF membership should be communicated according to the FWF communications policy.

**Comment:** During the last months of 2015, Maier Sports communicated 'a fairness guarantee' on its hang tags. After FWF had alerted Maier Sports that this was not in line with the FWF communications policy, Maier Sports immediately changed the hang tags. In the previous Brand Performance Check, it was also noted that communication did not adhere to the FWF communications policy. Therefore, despite a proper response, full points cannot be awarded.

6.2 Affiliate engages in advanced reporting activities	Yes	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	1	0
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**Comment:** Maier Sports has published the Brand Performance Check report online, but does not yet publish its supplier list or audit reports online.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Published on affiliate's website	The Social Report is an important tool for affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	2	2	-2
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Comment: Maier Sports published its social report 2015 online.

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## TRANSPARENCY

Possible Points: 4

Earned Points: 1

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## 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 FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: The CSR officer and CEO evaluate FWF membership annually.

7.2 Changes from previous Brand Performance Check implemented by affiliate	66%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2
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Comment: Maier Sports had three requirements in the last Brand Performance Check (2.6, 4.4 and 6.3.) Since it has stopped production at its Bangladeshi supplier, it can no longer enroll this supplier in a Workplace Education Programme-training. It has also published the social report online. It started to enroll its own factory in the Workplace Education Programme-training, but this only amounts to a small percentage of its FOB. Maier Sports should more actively motivate its suppliers to join the WEP-trainings.

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## EVALUATION

Possible Points: 6

Earned Points: 6

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## RECOMMENDATIONS TO FWF

Maier Sports had several recommendations for FWF. These were:

- To translate audits and Corrective Action Plans into the local language, at least in Turkish, Chinese and Bangladeshi.
- To ensure that the Worker Information Sheets include the correct information.
- To ensure that all FWF documents have a 'date of creation' to make it more easier to know the latest version of a document.
- To improve the quality of the pictures in the FWF Marketing Tool.
- To provide more clear guidance on the obligation to audit home workers, subcontractors and factories in the tail.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	31	42
Monitoring and Remediation	21	32
Complaints Handling	5	7
Training and Capacity Building	5	11
Information Management	7	7
Transparency	1	4
Evaluation	6	6
Totals:	76	109

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

70

PERFORMANCE BENCHMARKING CATEGORY

Good



## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

28-06-2016

Conducted by:

Wilco van Bokhorst

Interviews with:

Simone Mayer - CEO

Agnes Neeth - Technical Manager, Contact Person FWF/CSR

Maximilian Briehm - Marketing

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data.