



Brand Performance Check

Mini Rodini AB

Publication date: August 2024

This report covers the evaluation period 01-01-2023 to 31-12-2023

About the Brand Performance Check

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

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 126

Possible score: 198

Benchmarking Score: 64

Performance Benchmarking Category: Good



Summary:

Mini Rodini AB (Mini Rodini) has shown progress and met most of Fair Wear's performance requirements. With a total benchmarking score of 63, the member is placed in the Good category.

Based on the risk identification, Mini Rodini has linked factory risks to appropriate follow-up and action plans for factories covering 66% of its FOB.

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

Mini Rodini used Fair Wear's HRDD facilitation tool for its risk analysis, which aligns with the OECD requirements, focusing on different risks, including a gender lens. Mini Rodini uses this tool to prioritise risks in its supply chain, using a traffic light system to indicate low, medium, and high risks. Based on the risk scoping, Mini Rodini did a factory risk assessment. The member improved its work on a remediation system and improvement and prevention measures based on its risk assessment. The member has adapted its monitoring approach to thoroughly identify potential non-compliance. Mini Rodini has followed up partially on the enhanced monitoring policy for Türkiye.

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

Mini Rodini could show progress in many areas since the last performance check and increased its CSR staff.

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

Performance Category Overview

Leader: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

Needs Improvement: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

Company Profile Mini Rodini AB

Member company information

Member since: 1 Jan 2016

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

Percentage of turnover of external brands resold 0%

FLA Member No

Number of complaints received last financial year 0

Basic requirements

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

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

Membership fee has been paid? Yes

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

Production Country	Number of production locations	Percentage of production volume
Türkiye	20	67.72%
China	10	22.79%
Portugal	6	9.51%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: Yes

Comment: Mini Rodini has a solid Human Rights Due Diligence policy in place. The member company has published its Human Rights Due Diligence policy.

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: Yes

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

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

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

Comment: Mini Rodini discloses 92% of production locations internally through Fair Wear's information management system.

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

Comment: Mini Rodini discloses 92% of production locations externally on Fair Wear's transparency portal.

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

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

Possible Points: 90

Earned Points: 60

Indicators on Sourcing strategy

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

Comment: Mini Rodini has a sourcing strategy addressing influencing labour conditions. The member has 36 active suppliers. 75% of the production volume comes from suppliers, where the member has at least 10% leverage at suppliers. 8% of the production volume comes from suppliers where Mini Rodini buys less than 2% of its total FOB. This is comparable to the previous year. Mini Rodini's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. The member company stated it has reached a point where it can't consolidate further.

Recommendation: Fair Wear recommends the member to include SMART goals in its sourcing strategy.

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

Comment: Mini Rodini has a sourcing strategy that focuses on maintaining long-term relationships. 57% of the member's total FOB volume comes from suppliers with whom Mini Rodini has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Mini Rodini to commit to long-term contracts.

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

Comment: Mini Rodini conducts risk scoping and includes all risk factors (country, sector, business model, sourcing model and product). In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The risk scoping includes a gender lens. The member particularly looks at all Code of Labour Practices and how women are affected. Input from workers, suppliers, and stakeholders is included in the risk scoping by the information from different audits. The member brand has not included its cooperation with partners for design collaborations as a business model risk in its risk scoping. Additionally, Mini Rodini's sourcing strategy privileges countries where workers can freely form or join a trade union and/or bargain collectively.

Recommendation: The member is urged to assess the risks of working with licensees or design collaborations.

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

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Intermediate	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	4	6	0

Comment: Mini Rodini collects human rights information of potential new suppliers by collecting existing audit reports. If audit reports show higher risks or suppliers are reluctant to share information regarding human rights, CSR has the final say, and sourcing will be adjusted. The company does not collect information from workers or stakeholders to inform the sourcing decision. The member also collects basic human rights information for suppliers of licensees or of partners in design collaborations. Moreover, Mini Rodini's sourcing strategy privileges suppliers where workers are free to form a trade union and/or bargain collectively. Mini Rodini followed this process for the suppliers added in the last previous year.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order. Fair Wear strongly recommends that the member collects more information about working conditions for suppliers used by licensees or partners in design collaborations.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, and social dialogue mechanisms within the first year of starting business.	Intermediate	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	4	6	0

Comment: Mini Rodini has added one new supplier and three supporting processes. Mini Rodini shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The Worker Information Sheet has been posted. The member has enrolled its new supplier in a Work Education Program Basic.

Recommendation: Fair Wear recommends Mini Rodini to include a discussion with workers on how they would like to provide feedback and report grievances to the management regarding their working conditions in its onboarding sessions.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

Comment: Mini Rodini has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tool and frequency per country. For instance, the brand assesses human rights risks in its production locations in China and Türkiye that its risk scoping identified as having a higher risk of Freedom of Association, forced labour, minorities and refugees by organising Fair Wear audits and external audits. Mini Rodini's risk assessment tools do not explicitly include worker, stakeholder or supplier input.

Recommendation: Mini Rodini could complement its risk assessment process with worker, supplier, and stakeholder input.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process includes an assessment of freedom of association (FoA).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: Mini Rodini has mapped the risks to Freedom of Association (FoA) in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are no democratic systems in place, lack of participation in unions, worker committees that are often very male-dominated, and factory management that does not see the benefit of a union trade. There are higher risks in China regarding excessive overtime and for Türkiye due to migrant workers. Mini Rodini uses this information to understand the risks at its suppliers and inform itself about how to engage with them on this topic. Mini Rodini understands the status of FoA at each of its suppliers. The company can explain the main risks of FoA violations at all its suppliers, including the risks specific to women workers. The member knows which suppliers have trade unions and CBAs in place.

Recommendation: Mini Rodini should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

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

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

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

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

Comment: Mini Rodini evaluates its suppliers on the areas of price, quality, and delivery, but has yet to include the performance of human rights due diligence. Mini Rodini has worked on other priorities first.

Recommendation: Fair Wear encourages Mini Rodini 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 create an incentive to reward suppliers for realised improvements in working conditions.

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

Comment: Mini Rodini uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations or subcontractors in the database. To date, the member has not yet taken active preventive measures, for example, by visiting its suppliers during production in the last financial year.

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

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

Comment: Mini Rodini has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because the member brand's products do not have stitching or hand printing. Since Fair Wear onsite assessments or external audits have not identified homeworkers, Mini Rodini assumes that homeworkers are not used for orders. The member included in its HREDD policy that homeworkers are not allowed and discussed this with its suppliers. Mini Rodini analysed the capacity of suppliers to identify a potential risk.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Intermediate	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	2	4	0

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

Recommendation: Fair Wear strongly recommends Mini Rodini to include the shared responsibility of CoLP implementation in its contracts.

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

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, compliance with sustainability policies is included in the job description for purchasing and sourcing staff.

Recommendation: Mini Rodini could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

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

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

In 2023, Mini Rodini kept close contact with all production locations to monitor production progress. When a delay was expected, it was immediately communicated to the wholesale customers, who showed a general understanding of the situation. Mini Rodini did not put any pressure on production locations. The member increased its NOS amounts and accepts preorders to outbalance peak seasons.

Recommendation: Fair Wear recommends the member to explore planning production in minutes instead of pieces to assess better its suppliers' production capacity (and wage levels). Furthermore, at suppliers where Mini Rodini is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season. Fair Wear encourages the member to improve the accuracy of its forecasting further.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Basic	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	2	6	0

Comment: Mini Rodini has a basic understanding of the wage levels at its suppliers and does not connect this understanding to its own buying prices. Mini Rodini has some insight into the labour component of its prices. Mini Rodini does not know the number of actual sewing minutes needed for a style. Mini Rodini knows the labour minute value of one of its suppliers. Mini Rodini includes changes in legal minimum wage or inflation in its buying prices.

Recommendation: Mini Rodini is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown, for example using the Fair Price app. Mini Rodini could provide suppliers who do not work with fact-based costing, training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

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

Comment: Mini Rodini has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. In addition, the intermediaries actively support HRDD and the implementation of the CoLP by following up on Corrective Action Plans (CAPs) and being members of an initiative where fair payment terms are the base. The member checks if its intermediaries uphold the purchasing practices mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Layer 3 Prevention, mitigation and remediation

Possible Points: 86

Earned Points: 50

Indicators on the quality and coherence of a members' prevention and remediation system

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

Comment: Based on the risk identification as described in chapter two, Mini Rodini has linked factory risks to appropriate follow-up for factories covering 67% of FOB. The member audited its suppliers from Türkiye according to the enhanced monitoring guidance but has not trained them yet.

Recommendation: Fair Wear recommends the member to further complete its action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: Mini Rodini has included partly a gender lens in some of its improvement and prevention steps.

Recommendation: Mini Rodini is recommended to extend its gender lens to all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: Mini Rodini included some steps to encourage FoA and effective social dialogue in its action plans. These steps include collecting information on FoA through a questionnaire and discussing it with its suppliers. Mini Rodini checked, for example, if suppliers have a policy regarding FoA and their social dialogue is effective; if not, the member-created actions. The member has yet to make these steps more comprehensive and detailed. The member has yet to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: Fair Wear recommends Mini Rodini to include more comprehensive steps in its action plans. Mini Rodini is strongly encouraged to ensure worker representatives are involved in the steps that the member takes to promote freedom of association and effective social dialogue. Fair Wear recommends Mini Rodini to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

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

Comment: Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship or are monitored systematically every year (in the case of long-term partners). Mini Rodini uses a questionnaire to collect relevant information on factory-level grievance mechanisms. Mini Rodini supports and monitors the mechanism and responds when it is ineffective. When issues come up in a CAP or due to the questionnaire, the member brand exchanges with the supplier and follows up until improvement. The member brand discussed, for example, findings regarding the correct placement of grievance boxes and its effective procedure with its suppliers until it was improved.

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

Comment: Mini Rodini cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers that are not shared with other members, Mini Rodini works together with other customers. The member brand is in exchange with another customer regarding sustainability efforts at a factory in India that is currently onboarded. Next to that, the member also cooperates in taking more preventive measures with its joint living wage work.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	53%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2

Comment: During the performance check, Mini Rodini could demonstrate it has followed up on 53% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. Examples of improvement actions that were taken include legally binding contracts, excessive overtime and freedom of association. The CAP issues that require improvement actions and are still open are issues that are more complex or structural and therefore need more time to be remediated.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	4	6	-2

Comment: Mini Rodini has identified some root causes of the CAP issues and discussed these with its suppliers. The member has implemented some preventive steps. Examples of the discussed root causes are suppliers' lack of understanding of overtime regulations, grievance mechanisms, and correct payment calculations. The member brand implemented preventive steps such as an overtime policy, supporting grievance mechanisms, and living wage projects to address these root causes.

Recommendation: Fair Wear recommends Mini Rodini to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no action plan is needed.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

Comment: Mini Rodini has some suppliers where action plans are not needed. These cover 10% of the member's total FOB. The member brand has a system to ensure possible human rights risks are regularly discussed with these suppliers. Mini Rodini regularly reviews changes to the risk situation. The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

Recommendation: Mini Rodini is recommended to ensure worker representation or local unions (when appropriate) are included in discussions with factory management on possible human rights risks.

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

Comment: In the previous year, seven of the total twelve audit reports mentioned excessive overtime. Mini Rodini analysed the root causes of these findings. According to the member, the root cause for excessive overtime changes constantly. Some of Mini Rodini's suppliers remain reluctant to be open about working hours. The member has addressed this and promotes transparency about working hours by asking for time records. The member has not yet taken action to address the root causes.

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

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

Comment: In the previous year, seven out of twelve audits included findings regarding non-payment of the legal minimum wage or legally required wage elements. The findings were that allowances, bonuses, social security, benefits, or statutory leaves were not paid to workers as legally required. Mini Rodini responded to these findings by contacting the supplier and working together on the CAP findings.

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

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

Comment: Mini Rodini has a basic knowledge of the wage levels at its suppliers, mostly based on audit reports. The member brand discusses the topic of wages with all of its suppliers. Mini Rodini understands which suppliers pay wages below living wage estimates as a consequence of the member's actions. Mini Rodini followed up on this and reviewed internally how the member's practices, like forecasting and planning, could be altered and ensured this was done.

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

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

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

Recommendation: To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	37%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	4	6	0

Comment: Mini Rodini uses fact-based costing to ensure its additional contribution supports the payment of its share of a living wage estimate at suppliers responsible for 37% of Mini Rodini's FOB.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear's Access to Remedy Policy.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

Comment: Mini Rodini received no complaints in the past financial year at its suppliers.

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

Comment: Mini Rodini has some CAP findings where training is a recommended follow-up action. The member has not yet enrolled its suppliers with findings on no awareness about CoLP and Syrian workers in the following training modules: Onboarding training and Migrant Refugee Module for Türkiye.

Requirement: Mini Rodini needs to implement training to address the identified risks, with a particular focus on the requirements of enhanced monitoring guidance. Mini Rodini needs to follow up on CAP findings that show workers are not aware of the Code of Labour Practices by enrolling those suppliers in an appropriate training module.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	N/A	6	0

Comment: Mini Rodini did not implement training at its suppliers (NA).

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

Comment: Mini Rodini does not undertake activities related to human rights that go beyond Fair Wear's scope.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 16

Indicators related to communication

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

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

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

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

Comment: Mini Rodini does not sell external brands.

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

Comment: Mini Rodini has submitted its social report. The member brand has also published the report on its website.

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

Comment: Mini Rodini does not report on factory-level data. The member brand published its social report on its website, which includes country-level data and remediation results. Mini Rodini has yet to disclose its complete factory list and its time-bound prevention, remediation and mitigation actions.

Recommendation: Mini Rodini is recommended to include more factory-level data in its reporting and ensure suppliers consent with data sharing.

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

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

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Intermediate	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: The previous performance check included the following requirements: Identifying continuous human rights risks, responsible purchasing practices, implementation, quality, and coherence of member's prevention and remediation system, and brand and supply chain transparency. Mini Rodini followed up on most requirements. Together, more than half of the requirements were addressed.

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

5 Appreciation chapter

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

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

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

Recommendations to Fair Wear

Mini Rodini receives different (inconsistent) feedback and recommendations on policies from Fair Wear, which costs a lot of time to adjust. Mini Rodini could use this time better to work more on improving working conditions. The new Membership email procedure is an improvement.

Brand Performance Check details

Date of Brand Performance Check: **26-06-2024**

Conducted by: **Adele Kolos**

Interviews with: - Marina Davarinou (CEO)

- Klara Helmbold (Head of Sustainability)

- Elin Lindén (Sustainability Manager)

- Nicole Peira (Head of Production)

- Lovisa Järås (Sustainability Coordinator)