



# **Brand Performance Check**

## **Mini Rodini AB**

**Publication date: February 2023**

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

## About the Brand Performance Check

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

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

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

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

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

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

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

# Brand Performance Check Overview

## Mini Rodini AB

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

Member company information	
Headquarters:	Stockholm , Sweden
Member since:	2015-12-31
Product types:	Garments, clothing, fashion apparel; sports and activewear
Production in countries where Fair Wear is active:	China, India, Turkey
Production in other countries:	Lithuania, Portugal
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	73%
Benchmarking score	63
Category	Good

## Summary:

Mini Rodini AB (Mini Rodini) has met most of Fair Wears' performance requirements. With a benchmarking score of 63, Mini Rodini is placed in the Good category. Although the monitoring threshold does not determine the category this year, Mini Rodini has monitored 73% of its production volume.

## Corona Addendum:

Mini Rodini is a Swedish children's wear brand and Fair Wear member since 2016.

Mini Rodini was hardly affected by the pandemic in 2021 compared to the year before. Employees could work full-time from home. The member's biggest challenge was massive fabric delays, especially garments from China, due to lockdowns in different areas.

Mini Rodini conducted weekly meetings with its suppliers and was flexible in accepting delivery delays. The member had a similar order amount to the previous year and did not cancel orders. Mini Rodini prepaid fabrics to support its suppliers during the pandemic. The member relied on the feedback given from its suppliers in the yearly questionnaire, where the member included COVID-19 questions.

Living Wage is a central theme in Mini Rodini's sustainability approach. Since 2016, the brand has contributed to higher wages at its production location in India. Since 2018, the brand also contributes to living wages at one of its main suppliers and subcontractors in Turkey. Throughout 2021, the brand was able to uphold this commitment and started its living wage project with an additional supplier in Turkey.

Fair Wear recommends that Mini Rodini links the risks to its suppliers and defines actions to prevent and mitigate supplier- and country-specific risks such as payment of minimum wages during lockdowns, excessive overtime and migrant labour.

## Performance Category Overview

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

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

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

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

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

## 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	70%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

**Comment:** Mini Rodini produces children's wear. The member's sourcing strategy aims for long-term sustainable business relationships. Part of this strategy is that the company aims to buy not more than 40% of the production capacity, to ensure the supplier is not entirely dependent on Mini Rodini. In 2021, the production volume percentage from locations where Mini Rodini buys at least 10% of the production capacity increased from 58% to 70%.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	7%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	3	4	0

**Comment:** Mini Rodini has a consolidated supply base, and the key suppliers generate the main FOB. The member uses some suppliers for small orders of special/seasonal items. Mini Rodini sources from suppliers where it buys less than 2% of production capacity that together produce for 7% of the member's total order volume, which is 14 out of 32 factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	51%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0



**Comment:** Mini Rodini values its suppliers and aims to create lasting business relationships. In 2021, the percentage of the production volume from production locations where a business relationship existed for at least five years decreased from 64% to 51%. The main reason for the decrease is moving capacities to suppliers, where the relationship started two years ago.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	0	2	0

**Comment:** Mini Rodini started production at seven new suppliers in China and Turkey in 2021. One supplier in Turkey has not signed and returned the questionnaire. Besides, all signed questionnaires from subcontractors are missing.

**Requirement:** Mini Rodini needs to ensure that new production locations and subcontractors sign and return the questionnaire before the first orders are placed.

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

**Comment:** Mini Rodini has included human rights due diligence on a general level in its sourcing process, detailing all steps needed before it can add a production location. This strategy addresses environmental standards and social compliance requirements for new suppliers. The buyer or sustainability manager does the sourcing of new production locations, which means the member uses a supplier profile checklist for the working conditions and social compliance. After all, the data is collected, the CSR manager takes the final decision on which supplier will be added. Mini Rodini's social monitoring program includes placing the CoLP poster before production, informing workers about their labour rights and providing them with the number of the complaint helpline. When the factory is in a risk country, Mini Rodini requests an existing audit report.

In 2021, Mini Rodini regularly reached out to all production locations to check on how business was going and whether they needed anything. In addition, it asked all production locations to fill out a brief questionnaire about the health and safety measures, lockdowns, and the continuous payment of wages during COVID-19. These questionnaires indicated all locations had taken measures to ensure workers' health and safety.

**Recommendation:** Fair Wear recommends Mini Rodini to link the risks prevalent in its sourcing countries to a risk assessment of its suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	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

**Comment:** Mini Rodini has a systematic supplier evaluation system that combines production location compliance with the Code of Labour Practices, focussing on, for example, wages, overtime, health & safety and worker awareness/representation, with production performance indicators. The results from the supplier evaluation do not lead to production decisions.

The member stopped working with 12 factories and communicated accordingly with its suppliers. The communication took place in most cases verbally and could not be shown as written proof.

**Recommendation:** Fair Wear recommends Mini Rodini to share and discuss the outcome of the supplier evaluation with all its suppliers. Furthermore, Fair Wear recommends Mini Rodini to consider how it can stimulate progress on social issues, for example, by offering price increases, bonuses or financial support to resolve issues.

Fair Wear encourages Mini Rodini to implement a responsible exit strategy and ensure all relevant staff is informed about this. Please see Fair Wear's guidelines on a responsible exit strategy.

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

**Comment:** Mini Rodini plans full 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 capacity of the suppliers, also 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 are aware that a delay in responding to suppliers asking for confirmations may cause a large production delay. The forecast created by Mini Rodini is flexible and focuses a lot on the supplier's side. There is a high tolerance for production delays. In 2021, 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.

**Recommendation:** Fair Wear recommends Mini Rodini AB to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

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

**Comment:** Several audits indicated excessive overtime. Mini Rodini has discussed some of these findings with the factories by forwarding the CAP and in personal meetings. According to Mini Rodini, its production volume was not causing overtime. The member has 15% - 40% leverage at factories, accounting for 70% of its purchasing volume. When Mini Rodini starts at a new production location, it emphasises overtime. The company also recognises that it is a challenging finding to remediate.

**Recommendation:** Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Mini Rodini to take measures when excessive overtime is found actively. The member can be part of the solution with its available leverage at the main part of its supply chain. Fair Wear recommends cooperating with other customers at the factory to increase leverage further when trying to mitigate excessive overtime hours. In addition, the company can consider placing orders in the low season when possible.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

**Comment:** Based on the design, estimated target volume, and retail price, Mini Rodini quotes a price and discusses it with the supplier. The member accepts if the price is higher than the quoted price or looks for different options with its suppliers to adapt the prices with other fabrics or processes. Buyers do not work with open costing or run a plausibility check on whether the prices they pay can cover the legal minimum wage. However, it is important to note that 35% of the total production volume comes from production locations where Mini Rodini increased prices to cover (its share) of a living wage for workers. An additional 26% comes from production locations in low risk countries. Besides, Mini Rodini is aware of the COVID-19 effects and adjusted the prices accordingly.

**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 FairPrice app.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

**Comment:** Fair Wear conducted three audits where non-payment of legal minimum wage occurred in the year under review. Besides, Fair Wear could not verify wages due to inconsistent or incomplete records in four other audited factories. The brand did not follow up on these issues sufficiently and did not ask for proof to verify the resolution of the findings.

In 2021 there were COVID-19 lockdowns in Turkey and partially in India. China was affected by power cuts. Mini Rodini did a yearly check-up with all production locations to gather information on the effect of COVID-19. Most factories said at that time they had not had any stoppages. However, the member did not check whether its factories closed at the time of lockdown and continued payment of legal minimum wage. The member did not ask for proof, like payslips, in its yearly check to verify if the suppliers paid the legal minimum wage during closures.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

If a supplier fails to pay minimum wages, Fair Wear expects Mini Rodini to respond in time, identify root causes with factory management, and resolve the issue. Mini Rodini must collect evidence of remediation. Factory visits with a documents check or additional verification by Fair Wear may be needed to verify remediation.

**Recommendation:** Fair Wear urgently recommends the member to discuss transparency issues with its suppliers. When suppliers remain intransparent about time and wage records, this should be reflected in the supplier evaluation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** Mini Rodini has kept all payment terms the same for the suppliers and made sure the suppliers were paid on time, just as before the pandemic. The member could demonstrate a sample of payments made within the agreed payment term, showing evidence such as invoices and bank transfer dates.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	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	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** Mini Rodini discusses living wages with all suppliers. The member company has already started implementation. The basis for implementation has been the wage calculation sheets to calculate the gap between the existing wage levels and different living wage benchmarks. The member has deeper insight and pays contributions to eight factories involved in its living wage program. Mini Rodini did not conduct a root analysis of wages being below living wages at its suppliers. The member addressed the impact of the pandemic on wages. The feedback from suppliers was that they were following the law.

**Recommendation:** Fair Wear encourages Mini Rodini to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management to form a basis for an embedded strategy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	6	6	0

**Comment:** Mini Rodini pays prices for its leverage that covers a living wage at one of the factories in Turkey and its subcontractors. In 2021 the member started a new living wage project with other Fair Wear members at another of its factories in Turkey. Mini Rodini pays its share of the living wage at its main production in India.

The goal in Turkey is based on the estimate of the local trade union and is informed by a workers' survey conducted at the production locations. It is based on the assumption that a family consisting of two working adults together provide for two children. The member calculated the living wage in India for one adult based on a worker survey that Mini Rodini conducted and extensive research into different living wage estimates. In both cases, the extra money needed is taken from the profit margin, and the total required additional amount was calculated using the figures of the production department.

At the Indian supplier where Mini Rodini pays the living wage factor, the member struggled with the unpredictability of the extra costs caused by discrepancies between packing lists and orders. As a solution, the member marked up all prices with 6%, and this percentage will stay the same in the future. This percentage is based on an average markup from previous calculations. In this way, the member aims to make the living wage strategy more sustainable, as the financial department will know the exact extra costs to budget from the start.

Likewise, Mini Rodini also adapted the payout of the living wage factor at the Turkish factories. The suppliers now sent the amount covering the living wage premiums in one invoice without the margin added to each piece. Mini Rodini pays the amounts in the same way twice or four times per year to the supplier to make the costs more predictable, while workers will continue to receive a living wage each month.

Mini Rodini was able to maintain its additional payouts throughout 2021. The member sees the topic of living wages as important, and it is discussed with CSR, higher management and the board.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	47%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	4	6	0

**Comment:** Mini Rodini contributes with its prices to paying living wages at seven factories in Turkey and higher wages at its main production location in India, totalling 47% of its FOB volume (excluding low risk).

## Purchasing Practices

**Possible Points: 52**

**Earned Points: 35**



## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	59%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	14%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	All factories must be visited by Mini Rodini AB staff at least once every three years.	
Total monitoring threshold:	73%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The Sustainability Manager is designated to follow up on problems identified by the monitoring system.

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

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

**Comment:** Mini Rodini shared the audit reports and Corrective Action Plans (CAP) findings with factories and worker representation, where applicable, within one week. The company established improvement timelines in a timely manner.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Basic	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

**Comment:** Mini Rodini has no procedure to follow up on Corrective Action Plans systematically and within the established timeline. Several Corrective Action Plans showed findings regarding COVID-19 issues, double-bookkeeping, excessive overtime, wages and juvenile workers, where the member did not take sufficient actions to resolve the issues. However, because of COVID-19, the company was in regular contact with all production locations and addressed ad hoc problems as they arose in daily business.

**Recommendation:** Fair Wear strongly recommends the member should take steps to remediate CAP findings and regularly check in with suppliers on the status and developments.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

**Comment:** Mini Rodini collected external audit reports for different production locations and assessed the quality only for some, but due to other priorities during COVID-19, the brand did not implement corrective actions.

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier and reduce double work. However, the member needs to assess the quality of the reports and follow up on corrective actions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average insufficient result on relevant policies	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	-2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

**Comment:** Turkey:

With half of the total FOB placed in Turkey, Turkey is the largest production country for Mini Rodini. The member has a clear internal policy for Syrian refugees in Turkey. The policy was not shared with a new supplier starting the cooperation in 2021. One production location employed Syrian workers, which was also a finding in a Fair Wear audit in 2021. Mini Rodini stated it ensures no discrimination; the member did not plan specific training for this factory within the last three years. In 2021 Mini Rodini enrolled one Turkish supplier into the WEP Factory Dialogue module, which introduces how effective communication can be a tool for problem-solving. Mini Rodini has not audited all production locations in Turkey by Fair Wear. In the audited factories, many findings were related to intransparent documents, which bear a high risk as wages, time records, and workers' files could not be verified. Besides, Mini Rodini has a policy against the use of subcontractors in place.

**Other risks:**

Around 23% of Mini Rodini's production comes from China. The company is aware of the main problems in China, specifically related to excessive overtime and forced labour in certain provinces. The company is also aware of the way most Chinese factory managers communicate about this. In communication with some of its Chinese production locations, Mini Rodini relies on a Swedish company acting as an intermediate for information. The member participated in an external investigation in 2019, where one of its Chinese factories had a finding. This factory failed to pass the work safety audit of a local government authority. According to the report, the "inspection found that the production safety education and training records were incomplete, on-site management was chaotic, and the production workshops messy. The member requested an audit which the factory rejected. Therefore, Mini Rodini stated it stopped cooperation with this factory in the reviewed year. However, the member could not show sufficient proof of an exit conversation.

Mini Rodini works with one production location in India. The member phased out of the factory by the end of the reviewed year. Therefore, the member did not closely monitor the country-specific risks such as gender-based violence and the COVID-19 impacts.

For all other production locations, Mini Rodini monitored COVID-19-related risks for all production locations on a basic level, during regular calls and through a questionnaire. During the lockdowns in Turkey and partially in India and the power cuts in China, Mini Rodini did not ask for proofs like payslips to secure workers' payments and time records to check on excessive overtime. Besides, many audit findings showed COVID-19-related issues, which were not followed up sufficiently. The member did not monitor whether worker representatives/trade unions were included in decisions related to OHS, wages, working hours and leave.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Mini Rodini needs to ensure its new Turkish supplier has a policy in place regarding the employment of Syrian workers. The member is required to enrol its Turkish supplier that employs a Syrian worker in specific training to prevent discrimination. All Turkish suppliers need to be audited.

Mini Rodini must first address the most urgent issues, following its prioritization of COVID-19 issues in collaboration with suppliers. Eventually, the member should show additional steps to remediate all COVID-19-related issues.

**Recommendation:** Following its risk scoping of the most prevalent and impactful risks in its sourcing countries, the member could identify standard follow-up actions.

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

**Comment:** Mini Rodini cooperated with other Fair Wear member companies in resolving corrective actions at one shared supplier in Turkey. Another Fair Wear member had the lead in the follow-up.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	52%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

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

**Comment:** For 52% of production in low-risk countries, the member meets monitoring requirements by visiting these suppliers in the last three years and checking the posted worker information sheet and the signed questionnaire. The member company also asks about the different wage levels of these suppliers and has collected external audit reports. Throughout 2021, Mini Rodini actively engaged with all production locations to check in on the situation regarding COVID-19 and discuss support possibilities.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

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## Monitoring and Remediation

**Possible Points: 26**

**Earned Points: 11**

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### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	1	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.	3	
Number of worker complaints resolved since last check.	3	

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

**Comment:** The Sustainability Manager is appointed to address worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

**Comment:** Mini Rodini could not demonstrate that all production locations and subcontractors have posted the Worker Information Sheets. Besides, audits in 2021 showed that Mini Rodini did not provide one factory in China and one in Turkey with the Fair Wear CoLP information.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

Mini Rodini must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. Mini Rodini AB should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

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

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

**Comment:** Mini Rodini received one complaint in 2021 in Turkey, which was related to a legally binding employment relationship. The member addressed the complaint following the Fair Wear Complaints Procedure. The complaint was closed in 2021. Mini Rodini received another complaint in the same production location regarding obligatory overtime by the end of 2020 and has taken preventive steps in 2021 by enrolling the factory in a Fair Wear factory dialogue training.

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

**Comment:** Mini Rodini cooperated with other Fair Wear members in addressing the complaints at a shared supplier in Turkey.

## Complaints Handling

**Possible Points: 11**

**Earned Points: 7**

## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** The CSR manager informs new employees about Fair Wear membership in an introduction meeting. Besides, the CSR manager presented the sustainability report to the staff.

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

**Comment:** Mini Rodini's Sustainability Manager is part of the production team. Before buyers plan a factory visit, the Sustainability Manager shares information and specific points for attention during a meeting. Information on suppliers was shared with the team when visits were not possible.

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

**Comment:** Mini Rodini has informed its agents in China and Turkey about Fair Wear's Code of Labour Practices. The agents actively support CoLP.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021. One Turkish production location has been enrolled in the WEP Factory Dialogue module, accounting for 8% of Mini Rodini's production volume in high-risk countries.

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

**Comment:** Mini Rodini did not exchange with other Fair Wear members about the advanced training at a joint supplier in Turkey in 2021. Another Fair Wear member in the lead conducted the follow-up.

**Requirement:** Fair Wear requires Mini Rodini to discuss the outcome of advanced training with other Fair Wear members and its supplier and agree on the next steps, such as regular dialogue or committee meetings.

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## Training and Capacity Building

**Possible Points: 7**

**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.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Mini Rodini has a subcontractor policy and agrees that suppliers can use subcontractors already included in Mini Rodini's monitoring. Mini Rodini has no system to find all production locations; the member was unaware of subcontractors (e.g. for embroidery, printing etc.). Due to the member, 70% of its production is GOTS certified, and this process should include subcontractors. Besides, Mini Rodini started a designer collaboration but did not understand that the production location needed to be added to its supplier list. The collaborating brand did not agree to share the name or address of the factory.

**Recommendation:** Members are advised to develop a systematic approach to complete the production location list. Part of the approach can be:

1. Automatically include information from the questionnaire, audit reports, and complaints
2. Business relationships with agents include transparency of production locations.
3. Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system, and information is shared on the subcontracted production process.

When collaborating with other brands, Mini Rodini needs to agree with the other brand that it shares the details of the used production location.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Recommendation:** Production staff and the sustainability manager frequently update each other on each supplier.

## Information Management

**Possible Points: 7**

**Earned Points: 4**



## 6. Transparency

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

**Comment:** Mini Rodini communicates about Fair Wear in line with the communication policy.

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

**Comment:** Mini Rodini has disclosed 76-99% of production locations through Fair Wear's website and to other members within the internal system.

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

**Comment:** Mini Rodini submitted the social report to Fair Wear.

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## Transparency

**Possible Points: 6**

**Earned Points: 5**

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

**Comment:** Mini Rodini is evaluating the Fair Wear membership throughout the year, with the involvement of top management. CSR is discussed a lot by the management team, which is crucial for Mini Rodini's founder and board.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	50%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

**Comment:** In the previous performance check, Fair Wear required Mini Rodini to share and discuss the audit report and CAP findings with the factory within two months. Besides, the member should specify a reasonable time frame for resolving findings. Mini Rodini made sufficient progress; the member shared the audit reports and Corrective Action Plan (CAP) findings with factories and worker representation, where applicable, within one week. The company established improvement timelines in a timely manner.

Fair Wear required the member to ensure it audits all production locations responsible for over 2% of production and production locations where Mini Rodini is responsible for over 10% of the location's production capacity. Due to COVID-19, this requirement has been considered non-applicable for the reviewed year.

Besides, Fair Wear required Mini Rodini to discuss the outcome of advanced training with its supplier and agree on the next steps, such as regular dialogue or committee meetings. The member made insufficient progress by not following up on the training outcomes.

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## Evaluation

**Possible Points: 6**

**Earned Points: 6**

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## Recommendations to Fair Wear

More clear guidance from Fair Wear on taking action and prioritising would be beneficial.

# Scoring Overview

Category	Earned	Possible
Purchasing Practices	35	52
Monitoring and Remediation	11	26
Complaints Handling	7	11
Training and Capacity Building	5	7
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	73	115

Benchmarking Score (earned points divided by possible points)
63

Performance Benchmarking Category
Good

## Brand Performance Check details

Date of Brand Performance Check:

22-09-2022

Conducted by:

Adele Kolos

Interviews with:

Elin Lindén - CSR

Sofie Nyström - Acting Assortment and Production manager // Senior Buyer

Agostina Romano - Accounting

Teresa Tayzon - Marketing