



# **Brand Performance Check**

## **Mammut Sports Group AG**

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

## Scoring overview

Total score: 136

Possible score: 208

Benchmarking Score: 65

Performance Benchmarking Category: Good



Foundational  
system's criteria

100%



Sourcing strategy

65%



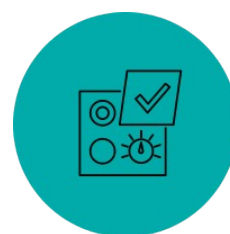
Identifying  
continuous human  
rights risks

73%



Responsible  
purchasing  
practices

77%



Quality and  
coherence of  
prevention and  
remediation system

60%



Improvement and  
prevention

55%



Communication,  
transparency and  
evaluation

82%

### Summary:

Mammut has shown remarkable progress and met most of Fair Wears' performance requirements. With a total benchmarking score of 65 the member brand is placed in the Good category.

In 2022, Mammut had a change in top management. Therefore, the focus in 2023 was also on restructuring some internal processes. However, this had no negative effects on the company's financial situation.

Mammut's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. This is included in the strategy and shown in the member's efforts in 2023. In 2023, Mammut introduced a new supplier classification, which will help the member brand focus on core suppliers and further consolidation.

Mammut uses a risk-based approach to conduct risk assessments per supplier. The results are used to prioritise follow-up actions and remediation efforts. The member has adjusted its sourcing strategy based on the results of its risk scoping. As a result of its risk-scoping analysis, Mammut decided to phase out of China. Mammut has drafted follow-up plans, focussing on suppliers in Bangladesh, Vietnam, China and Türkiye. The follow-up actions match the risk profile. The defined follow-up actions for factories in both production countries cover more than 80% of FOB. The member brand has signed the International Accord in 2023. The member could show prioritisation of follow-up plans for Bangladesh (enhanced monitoring programme), Vietnam, China and Türkiye (high risks). Mammut showed it included the more complex risks, such as discrimination and repetitive findings, such as excessive overtime.

In the previous financial year, Mammut started collecting data on gender, social dialogue, and Freedom of Association (FoA). Mammut developed a 'Worker Well-Being booklet' to increase awareness among factory supervisors and encourage best practices. Mammut has yet to make these steps more comprehensive and detailed. Furthermore, the member brand is encouraged to discuss higher-wage strategies with suppliers and develop a systemic and time-bound approach.

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

# Performance Category Overview

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

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

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

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

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

# Company Profile Mammut Sports Group AG

## Member company information

Member since: 1 Sep 2008

Product types: Outdoor products, Sports & activewear, Bags and Outdoorwear

Percentage of turnover of external brands resold 0%

FLA Member No

Member of other MSI's/Organisations Cascale, Bluesign, International Accord - Bangladesh, Textile Exchange, EOG (Europaen Outdoor Group), EOCA (European Outdoor Conservation Association), Wordly (Higg FEM & FSLM)

Other Initiatives EOG (Europaen Outdoor Group), EOCA (European Outdoor Conservation Association), Wordly (Higg FEM & FSLM)

Number of complaints received last financial year 5

## 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
Viet Nam	28	61.13%
Bangladesh	3	18.38%
China	10	12.38%
Romania	2	2.88%
Latvia	3	2.02%
Türkiye	3	1.19%
Lithuania	1	1.16%
Germany	2	0.72%
Taiwan	1	0.14%

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 8**

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

**Comment:** Mammut does not yet have a Human Rights Due Diligence policy. It does have a Responsible Conduct Policy, but some elements, such as social dialogue and a gender lens, are missing.

**Requirement:** Mammut needs to improve its Responsible Conduct Policy to ensure better alignment with the OECD guidelines.

1.2 All member company staff are made aware of Fair Wear's membership requirements, 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:** Mammut discloses 89% of production locations internally through Fair Wear's information management system. Fair Wear does not disclose Chinese factories on its website yet and therefore is lenient when members do not disclose Chinese factories.

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

**Comment:** Mammut discloses 89% of production locations externally on Fair Wear's transparency portal. Fair Wear does not disclose Chinese factories on its website yet, and therefore is lenient when members do not disclose Chinese factories.

**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: 64**

### 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:** Mammut has a sourcing strategy for influencing labour conditions, which is also shared with the suppliers. Mammut has 53 active suppliers, including factories for supporting processes. 39% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 23% of the production volume comes from suppliers where Mammut buys less than 2% of its total FOB. This is an improvement compared to the previous year.

Mammut's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients. This is included in the strategy and shown in the member's efforts in 2023. In 2023, Mammut introduced a new supplier classification, which will help the member brand focus on core suppliers and further consolidation.

**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:** Mammut has a sourcing strategy that focuses on maintaining long-term relationships. 70% of the member's total FOB volume comes from suppliers with whom Mammut has a business relationship for at least five years. Mammut does not have long-term contracts (of at least five years) with its suppliers. In 2023, Mammut introduced joint business plans for its main suppliers. This supplier commitment is not legally binding.

**Recommendation:** Fair Wear recommends Mammut 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.	Basic	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.	2	6	-2

**Comment:** Mammüt conducts risk scoping on country level and factory level. The member has developed an overview of human rights risks, using country studies from Fair Wear, Better Work as well as the Human Development Index (HDI), Corrective Action Plans (CAPs) and frequent factory visits as input. Business model, sourcing models and product level have not been included in the risk scoping.

In its risk scoping, the member has assessed the impact and prevalence of all labour standards. In its risk scoping, the member has not assessed the impact and prevalence of all risks correctly. For instance, Mammüt did not include forced labour in China or payment of legal minimum wages in Bangladesh as a potential high risk, while different sources indicate this. The risk scoping misses a gender lens, and the risks of sexual harassment and gender-based violence are not included. Input from workers and other stakeholders should yet be included in the risk-scoping exercise.

The member has adjusted its sourcing strategy based on the results of its risk scoping. As a result of its risk-scoping analysis, Mammut decided to phase out of China. The lack of Freedom of Association in those countries was part of the decision. For China, several factors influenced the decision, and human rights were one of them. Mammut decided to leave Myanmar in 2021, right after the military coup. Since then, no orders have been placed. Mammut is a signatory of the International Accord to ensure safe and healthy working conditions at its suppliers in Bangladesh and all factories are covered by the RSC (RMG Sustainability Council).

Nonetheless, Mammut's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. The brand's risk scoping still needs to include input from workers, suppliers and stakeholders.

**Recommendation:** The member is urged to assess the risk of forced labour and/or limited freedom of association and social dialogue in its supply chain. Furthermore, the member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

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 Mammut to inform new suppliers about Fair Wear membership by sending information about Fair Wear requirements. The Code of Labour Practices (CoLP) and questionnaire must be signed and returned before the first purchase order. This process has been followed for all three new suppliers added last year. Commitment to improving working conditions is an important decisive factor for Mammut. In 2023, the new suppliers also joined the Supplier Summit in Switzerland, which was organised by Mammut. Here Mammut informed all attending suppliers about Fair Wear CoLP and the grievance mechanism.

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:** In 2023, Mammut onboarded three new suppliers in Vietnam. Before onboarding new suppliers, the brand collects human rights information from potential new suppliers by collecting Fair Wear's supplier questionnaire and existing audit reports. Before placing the first order, top management and/or staff from the Corporate Responsibility (CSR) department visit new suppliers. Mammut followed this process for the suppliers added in the previous year. One new factory that was onboarded in 2023 is owned by a long-term production partner of Mammut.

Based on the evaluation's outcome, the brand decides whether or not to onboard the potential new supplier. During the Brand Performance Check, Mammut showed that the CSR department decided not to onboard a potential supplier based on the information collected about the factory.

The member brand did not collect information from workers or stakeholders to inform the sourcing decision. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively.

**Recommendation:** Fair Wear encourages Mammut to collect worker and stakeholder input before placing the first order.

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:** Mammut has added three new suppliers in 2023. The member shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted at all new suppliers' facilities.

In 2023, Mammut organised Workplace Education Programme (WEP) training for four existing suppliers in cooperation with other Fair Wear member brands. For one new supplier, another Fair Wear member brand organised a WEP training in Vietnam. The training report was also shared with Mammut.

**Recommendation:** Mammut is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business.

## 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:** Mammut has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for each production location, including subcontracting partners. The risk assessment on the supplier level mainly includes information from factory assessment results. Mammut uses Fair Wear factory assessments, which include worker and stakeholder input, and other third-party audits in its monitoring. Factory assessments are scheduled every three years. In 2023, Mammut conducted a survey with its suppliers on gender, wages and Freedom of Association (FoA).

The risk assessment does not include an assessment of the likelihood and severity. Mammut uses a traffic light system to evaluate the risks per labour standard.

Regarding the Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh, Mammut sources from three factories that the RMG Sustainability Council (RSC) covers. Mammut is a signatory of the International Accord.

**Recommendation:** Fair Wear recommends Mammut to align its risk assessment with the OECD guidelines, by including the likelihood and severity and a risk matrix. The member brand is urged to link the risk-scoping (see indicator 2.3) with the risk assessment on the factory level in order to identify the appropriate tool and frequency depending on the outcome of the risk-scoping and risk assessment. Hence, Fair Wear recommends that Mammut doesn't depend on full assessments alone and expands its tools to assess risks.

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).	Basic	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	2	6	0

**Comment:** Mammüt has mapped the risks to FoA of its production countries on a basic level. The member brand has identified that the following production countries in its supply chain that show the highest risk: Türkiye, Vietnam, Bangladesh and China. Mammüt did not include the risks to women workers. Mammüt based the risk mapping mainly on an analysis from factory assessments in its supply chain.

In 2023, Mammüt sent out a questionnaire to its main suppliers to analyse the status of unions and worker committees in factories in China, Vietnam, Bangladesh and Türkiye. The supplier questionnaires include questions on FoA, unionisation, and worker representation. Mammüt uses this information to understand what the risks at its suppliers are and inform itself how to engage with its suppliers on this topic.

**Recommendation:** Mammüt is encouraged to deepen its understanding of risks to FoA in its supply chain. Mammüt is also recommended to use the Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers. Furthermore, Mammüt 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.	Intermediate	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.	4	6	0

**Comment:** Mammut did not include a gender lens in its risk scoping. The member brand does not collect gender-disaggregated data on country level. In 2023, Mammut started to collect gender data for its main suppliers in Vietnam, China, Bangladesh and Türkiye. The questions cover gender equality in local culture and national legislation and how each factory manages this topic.

The member could show it understands the basic gender risks for its sourcing countries. For instance, Mammut identified sexual harassment, gender-based violence, gender equality and discrimination as significant risks prevalent in Bangladesh and Türkiye.

At factory level, the member brand focused on collecting data on gender pay gap, health and safety, awareness raising and training programmes for women. Mammut did not yet collect data if the factory has an anti-harassment or discrimination policy and an anti-harassment committee.

**Recommendation:** Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices. Furthermore, Mammut is recommended to collect gender data per factory related to every Code of Labour Practices. Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

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.	Advanced	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.	4	4	0

**Comment:** Mammut has a robust and systematic evaluation system for assessing suppliers' human rights performance. The member scores human rights issues per supplier as part of its overall performance. The supplier evaluation is used as input for internal discussions with buyers when deciding on core partners as part of the sourcing strategy.

Supplier performance is evaluated and shared annually in meetings between the supplier and the brand. The outcome must still be shared with worker representatives at the production locations.

Mammut systematically integrates the outcome of this evaluation into its purchasing decisions. If a supplier performs low, extra attention is given to see how they can improve. In the past, based on the production location's assessment and sourcing strategy, several factories were selected to be phased out. This is a longer process, in cooperation with the supplier. A positive outcome of the evaluation could result in a joint business plan and long-term production planning with the supplier.

**Recommendation:** Fair Wear recommends Mammut to share and discuss the outcome of the supplier evaluation with worker representatives.

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.	Advanced	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.	4	4	0

**Comment:** Mammut uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. In 2023, there is no evidence of missing first-tier locations in the database.

Additionally, the member actively prevents unauthorised subcontracting by visiting suppliers during production. Quality Control staff closely follow where production takes place. Capacity is compared to the number of workers on duty, and any quality issues are flagged to crosscheck whether the item was produced at the authorised location.

Moreover, unauthorised subcontracting is forbidden according to Mammut's written General Purchase Agreement. The agreement is signed by all suppliers.

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:** Mammut has identified whether homework is prevalent in its sourcing countries. The brand's strong capacity planning and frequent factory visits enable Mammut to monitor this closely. In 2023, all suppliers were asked about homeworkers, and none was found. Most production occurs in EPZs with rules preventing goods from leaving EPZs (to stop counterfeiting). This minimizes the risk of homeworking as well. Mammut is aware of the risks of homeworkers and indicated that most of its production processes are not likely to be done by homeworkers due to their highly technical character.

## 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:** Mammut signs a General Purchase Agreement with each supplier. A signed price agreement, forecast agreement, and the signed CoLP accompany this agreement. Payment terms are included (no later than 60 days after invoice receipt), but liability and penalties for delays are not yet in line with the RBC policy. According to agreements verified during the performance check, penalties are set for late delivery where per default, the supplier would be held accountable, without investigating root cause.

**Recommendation:** Fair Wear strongly recommends that Mammut remove penalties for late delivery from its contracts or at least ensure there is 'proof of fault by the supplier'. Mammut is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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.	Intermediate	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.	4	6	0

**Comment:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. All relevant staff has access to audit reports and CAPs. Buyers, quality control staff and technicians that visit suppliers are regularly updated on CAP issues and instructed by the Head of Vendor Management. The buying team is trained in responsible sourcing and purchasing, which is highly integrated into the overall tasks of the teams. The CSR team has created a Fair Wear Handbook for buyers underlining the shared responsibility to support the CoLP.

Mammut has yet to explicitly include these responsible business practices in job role competencies or strong KPIs that support good sourcing and pricing strategies within their sourcing, purchasing, and design departments.

**Recommendation:** Mammut could adopt more explicit 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:** Mammut has a strong production planning system with a realistic assessment of production capacity. The member has two seasonal types of products (summer and winter) and a range of Never Out of Stock items. Lead times are three to eight months, depending on the product type. Mammut agrees on a production capacity plan with its suppliers at the beginning of the year, indicating order dates and amounts. To facilitate balanced production planning, Mammut shares detailed forecast information with suppliers, updated monthly, and includes an estimate of fabric delivery. Feedback from all suppliers is included and used to finalise the planning. The supplier always agrees on order dates. After placing the purchase order, changes cannot be made to the design, and in case of delays, Mammut accepts a later delivery. In 2023, Mammut introduced a new software tool which makes it possible for suppliers to directly communicate and monitor the planning process..



Mammut could show that it actively involves suppliers in the forecasting and that various departments within the company jointly do the planning. Also, the member's forecasting accuracy increases per year. The planning and production process is evaluated yearly with the suppliers.

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.	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, cost sheets including labour minutes.	4	6	0

**Comment:** Mammut understands the wage levels of its suppliers and has started to apply a plausibility check to its buying prices against wage levels. Mammut follows a partnership approach when negotiating prices. When developing a new style, Mammut involves its suppliers and agrees on a target price based on supplier feedback and experience. Part of the process is the discussion of an open costing sheet (fabric, CMT, trims), which is a requirement of Mammut to its suppliers. The open costing sheet includes a standard minute cost provided by the supplier, which is cross-checked with an international database against legal minimum wages. Labour costs do not include indirect labour or overhead costs. The standard minute value is not known.

Once the price is set, it remains fixed for this style and is not renegotiated with every order, except when wages rise. Mammut constantly analyses wage levels to learn how to link its buying prices more accurately by working with product costs as a basis. However, Mammut includes changes in legal minimum wage or inflation in its discussion with suppliers about the buying prices.

**Recommendation:** Mammut is encouraged to train buyers on cost breakdowns, for example, by using the Fair Price app.

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:** Mammut has informed all its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support the implementation of the CoLP by attending meetings, staying in close contact with Mammut and taking an active role in the follow-up of CAPs.

## Layer 3 Prevention, mitigation and remediation

**Possible Points: 96**

**Earned Points: 54**

### 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:** Mammut has drafted follow-up plans, focussing on suppliers in Bangladesh, Vietnam, China and Türkiye. The follow-up actions match the risk profile. The defined follow-up actions for factories in both production countries cover more than 93% of FOB. The member has signed the International Accord in 2023. The member could show prioritisation of follow-up plans for Bangladesh (enhanced monitoring programme), Vietnam, China and Türkiye (high risks). Mammut showed it included the more complex risks, such as discrimination and repetitive findings, such as excessive overtime.

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:** Mammut has started to collect data on gender-related risks per production country, and has started to incorporate that into the prevention and improvement actions per production location yet. The member plans to do so in 2024.

Mammut developed a so-called 'Worker Well-Being booklet', which also includes gender-related issues. It focuses on biological women and issues such as menstruation, pregnancy, breastfeeding, child care, and menopause. Mammut aims to increase awareness among factory supervisors and encourage best practices. The booklet has been translated into 18 languages. Two factories in Vietnam have done an information session for workers about the booklet.

**Recommendation:** Fair Wear recommends Mammut to make the gender lens in its action plans more comprehensive.

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:** Mammut included some steps to encourage FoA and effective social dialogue in its action plans. These steps are especially about raising awareness of the need for effective social dialogue, including grievance mechanisms and trade unions. Similar to indicator 3.2, Mammut uses the 'Worker Well-Being booklet' as a basis to increase awareness among factory supervisors and to encourage best practices. 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:** Mammut is recommended to, together with the supplier, distribute non-retaliation letters to workers, ensuring workers know they will not be punished for joining or forming trade unions.

Fair Wear recommends Mammut to include more comprehensive steps in its action plans. Fair Wear also recommends Mammut 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.	Basic	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	2	6	0

**Comment:** Mammut follows up on issues related to factory-level grievance mechanisms when they come up in CAPs. Mammut supports internal grievance mechanisms through awareness training with its suppliers and the 'Worker Well-Being booklet', yet the effectiveness of the mechanisms is not monitored.

**Requirement:** Mammut needs to systematically assess the existence and functioning of internal grievance mechanisms and monitor their functioning.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	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:** Mammut cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. At suppliers not shared with other members, Mammut works with other customers on CAP follow-up, complaints handling and training.

## Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	59%	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:** In the past financial year, Mammut has received seven Fair Wear onsite assessment reports and 13 external audit reports from other third-party organisations. During the performance check, the member could demonstrate with a sample that more than half of the CAP issues requiring improvement actions have been followed up. Improvement actions include health and safety matters or management-worker dialogue regulation. Mammut has shown that it also followed up on more structural and complex issues, such as transparency on wage structures and excessive overtime hours.

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:** Mammut has identified root causes at country level in its strategy papers. In some cases, Mammut has started to analyse root causes at the factory level and define preventive steps addressing root causes. Mammut identified that mainly a lack of awareness and the lack of training possibilities during COVID-19 leads to many health & safety findings. In 2023, Mammut introduced the 'Worker Well-Being booklet' as a way to directly influence factory supervisors by making them aware of Fair Wear COLP, grievance mechanism, and various health and safety aspects.

In Bangladesh, Mammot decided to join a pilot about the Employment Injury Scheme (EIS) sector as the first step towards a sustainable contributory social insurance system. Mammot expects that through this successful pilot, workers and their families (especially the women, and vulnerable, who are dependent on the deceased or disabled workers) will be under an improved income protection system.

**Recommendation:** Fair Wear recommends Mammot to identify root causes of all CAP issues together with its suppliers.

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:** Mammot has some suppliers in Germany, Latvia and Lithuania where the risk assessment shows that improvement or prevention steps are not needed. These cover around 4% of the member's total FOB. Mammot has a system to ensure possible human rights risks are regularly discussed with these suppliers. Worker representatives or local unions are not yet included in those discussions.

**Recommendation:** Mammot is recommended to ensure worker representation and 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.	Intermediate	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.	4	6	0

**Comment:** Although Mammut has a strong capacity booking system supporting reasonable working hours, excessive overtime is still found in its supply chain. In the previous year, four out of seven Fair Wear audit reports, as well as two out of 13 external audit reports, indicated problems related to excessive overtime.

In 2023, most of the audits with excessive overtime hours show that workers did not receive one day off per seven days of work.

Mammut identified that for two suppliers in Bangladesh and Vietnam the audit was done before the first purchasing order was placed. Mammut showed it analysed the root causes of most findings. Recovering business after the Covid-19 pandemic is a significant cause for excessive overtime, according to the member. Dialogues were held with the relevant suppliers on how to remediate this. Overall, Mammut could show it applies strategies to avoid pressure on the factories, such as accepting late deliveries, moving carry-over styles to low season and sharing forecasting earlier in the planning process. The next step would be to define steps that demonstrably lead to reduced overtime.

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.	Advanced	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.	4	4	-2

**Comment:** In the previous year, two out of seven Fair Wear onsite assessments included findings regarding non-payment of legally required wage elements. External audit reports did not include any findings regarding non-payment of legal minimum wages. One Fair Wear assessment in Bangladesh and one audit in Vietnam showed that allowances, bonuses or social security benefits are not paid as legally required. For instance, in one case the supplier did not provide the required time off to workers eligible for maternity leave. The other supplier did not assist and support the building of nursery schools, kindergartens, or partial cost of childcare at kindergartens for its workers as required by local law. Both audits were conducted before the member brand placed a purchasing order in both factories. Nevertheless, the member brand followed up immediately on the mentioned issues and could show evidence that it verified the remediation process.

Mammut also linked these findings back to the risk assessment and included specific questions on these topics in its questionnaire for suppliers for further monitoring purposes.

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.	Basic	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.	2	6	0

**Comment:** Mammut understands which suppliers pay wages below living wage estimates, using benchmarks from Global Living Wage Coalition and Asia Floor Wage for its production countries Vietnam, China, Türkiye and Bangladesh (where over 90% of the total FOB comes from). Wages and factors affecting wages are discussed with Mammut's main suppliers using the Fair Wear wage ladder where available.

Mammut has not done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Therefore, the member has yet to develop a systemic and time-bound approach to get wages increased towards a living wage.

**Recommendation:** Fair Wear encourages Mammut to discuss different strategies to work towards higher wages with suppliers 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.

Fair Wear also encourages Mammut to involve worker representatives and local organisations in assessing 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
3.12 Member company determines and finances wage increases.	Basic	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.	2	6	0

**Comment:** In 2023, Mammut analysed the wage levels and the gap towards living wage estimates at its main suppliers in Vietnam, Bangladesh, Türkiye, and China. Mammut started to work on a strategy to increase wages and decided to focus on the Global Living Wage Coalition's living wage estimate. The next step will be to select suppliers for the first implementation project.

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.	0%	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.	0	6	0

**Comment:** Mammut does not yet pay its share of a living wage at any of its production locations.

**Requirement:** Mammut is expected to begin setting a target wage for its production locations.

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.	Advanced	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.	4	4	-2

**Comment:** Mammut received three complaints in the past financial year about legally binding employment relationship, living wage, safe & healthy working conditions and no discrimination in Vietnam and Bangladesh. Mammut actively responded to these complaints per Fair Wear's Complaints Procedure and reached out to the supplier immediately. The information and steps taken are shared internally to prevent the issue from reoccurring. A clear system keeps track of each complaint, steps taken, feedback and status. For some of the complaints, Mammut cooperated with other Fair Wear member brands.

One complaint could not be solved, because the complainant was not open for further investigation. The remediation process for one complaint in Bangladesh is still ongoing, as the complaint was filed in December 2023.

Mammut included the outcome of these complaints in deciding on follow-up in its human rights improvement and prevention plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Basic	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.	2	6	0

**Comment:** In the past three years, Mammut has organised six WEP Basic and one Communication Programme training sessions at its Chinese and Indonesian suppliers. The decision to provide training to its suppliers depends on the improvement and remediation plans based on audit results and complaints, as well as the outcome of continuous monitoring.

The member has not yet enrolled all of its suppliers with findings on missing social dialogue and lacking awareness of FoA in training programmes like the 'Communication and Factory Dialogue Programme' in Vietnam.

**Recommendation:** Mammut is recommended to implement training for all factories where this is part of its improvement and/or prevention programme.

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

**Comment:** The member has shared the training reports with its suppliers and started a dialogue with its suppliers about the outcome of the training. Mammuto did not yet use the training results as input for Mammuto's human rights due diligence.

**Recommendation:** Fair Wear recommends Mammuto to use the training results as input for Mammuto's human rights due diligence.

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

**Comment:** Mammut's human rights risk monitoring includes a responsible exit strategy and shared with each supplier in business agreements and policy documents.

In the past financial year, the member stopped working with nine suppliers in China, India, Vietnam, Portugal, North Macedonia and Latvia, including three subcontractors for support processes. The other suppliers used to be tail-end suppliers with very low FOB and leverage. Also, Mammut started an exit process for some of the factories in China. Exiting these suppliers is part of Mammut's consolidation strategy. The exit from these suppliers was communicated roughly a year in advance, and if styles were being discontinued or moved to another supplier. Phase-out is usually done over two or three years with programs to use up materials by making products for factory outlet shops. Mammut showed a responsible process with clear communication via email.

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:** Mammut does not undertake monitoring 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: 18

## 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:** Mammot communicates accurately about Fair Wear membership on its website. The member brand also uses other channels to inform customers and stakeholders about Fair Wear membership. By frequently contributing to events as a speaker and through widely spread newsletters and guidebooks for retailers, Mammot actively spreads the Fair Wear message.

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:** Mammüt does not sell external brands, so this indicator is not applicable.

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:** Mammut has submitted its social report, which Fair Wear approved. The report is also published on Mammut's 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:** Mammut reports on factory-level data and remediation results. Additionally, the member publishes its full factory list, but no time-bound improvement plans for each supplier are shared with the public yet.

**Recommendation:** Fair Wear recommends Mammut to publish time-bound plans for its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Advanced	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.	6	6	0

**Comment:** Mammut has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. The internal evaluation system involves top management, the sourcing and product teams. Meetings are held for evaluation and next steps on a bi-monthly basis.

Input from relevant stakeholders is collected and included, for example, through regular meetings with Clean Clothes Campaign and local organizations in the production countries. Feedback from suppliers is also included in the evaluation, either through on-site meetings or input during complaints handling processes.

**Recommendation:** The member is advised to include feedback from workers 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 five requirements: Mammut must map the risks to FoA for all countries it sources from and understand if FoA is respected by its suppliers (indicator 2.8). Therefore, it must also include steps to promote FoA and social dialogue in its improvement or prevention actions (indicator 3.3). Furthermore, Mammut was required to start including a gender lens in implementing improvement or prevention actions (indicator 2.9) and must start including a gender lens in implementing improvement or prevention actions (indicator 3.2). Next to that, Mammut was required to systematically assess the existence and functioning of internal grievance mechanisms and monitor their functioning (indicator 3.4). In regards to the payment of living wages, Mammut was expected to begin setting a target wage for its production locations (indicator 3.13).

Mammut has followed up on four out of five requirements by mapping the risks to FoA of its production countries and on factory level, as well as for gender equality. The member brand started to implement Mammut has started to collect data on gender-related risks per production country, and has started to incorporate that into the prevention and improvement actions per production location. Furthermore, Mammut has also set a target wage for its production locations. However, Mammut does not have a strategy yet on how to pay its share of a living wage at any of its production locations.

The member brand did not yet follow up on a more systematic assessment for a functioning internal grievance mechanism.

**Recommendation:** Mammut 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.: Yes

**Comments:** Mammut launched the 'Improving Worker Well-Being booklet' in November 2023 and translated it into 18 different languages. It was presented by Mammut to Fair Wear member brands as well as co-hosted by the European Outdoor Group (EOG) and the association 'Feministische Perspektiven auf Politik, Wirtschaft & Gesellschaft' (FEMNET) in a webinar in April 2024. The goal is to share it with the wider industry to make sure workers are properly trained about the eight labour standards.

## Recommendations to Fair Wear

Mammut mentioned that the Fair Wear database is not user-friendly. The CSR team mentioned that they do see the value in this, but it takes a lot of time to get familiar with the system and is very intensive to enter all the data. In general, the member brand highlighted that it sees a positive development in adding audit reports and Corrective Action Plans (CAPs) directly to the database instead of handling everything in Excel files.

Furthermore, Mammut mentioned that the new Brand Liaison approach is not suitable for the member brand, as they miss direct contact with Fair Wear. They feel pushed away from Fair Wear and wish to have more personal contact again.

In general, Mammut is very happy about the process of this Brand Performance Check and also highlighted the positive effect of Fair Wear cooperating with other partner organisations now. Mammut also mentioned they appreciate the alignment with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

Mammut also wishes for more support from Fair Wear when it comes to the deeper supply chain, especially Tier 2.

## Brand Performance Check details

Date of Brand Performance Check: **22-05-2024**

Conducted by: **Victoria Lauer**

Interviews with: **Michael Farnworth (Social Compliance & Vendor Management Lead)**

**Paul Cosgrove (Chief Product Officer)**

**Michael Rammelsberger (Chief Supply Chain Officer)**

**Tobias Steinegger (Head of Corporate Responsibility)**

**Matteo Albertoni (Junior Corporate Responsibility Analyst)**

**Andreas Buchberger (Head of Sourcing)**

**Mariana Liebbe (Team Lead Buying)**