



Brand Performance Check

Marc O'Polo SE

Publication date: March 2025

This report covers the evaluation period 01-06-2023 to 31-05-2024

About the Brand Performance Check

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

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

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

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

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

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

Scoring overview

Total score: 174

Possible score: 208

Benchmarking Score: 84

Performance Benchmarking Category: Leader



Summary:

Marc O'Polo has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 84, the member is placed in Leader category. Marc O'Polo has met all foundational system criteria. This includes the development of a publicly shared Human Rights Due Diligence policy, training of staff interacting directly with suppliers, and disclosure of production locations.

The member company's sourcing strategy is linked to its human rights due diligence processes. Marc O'Polo has prioritized increasing influence over working conditions by consolidating suppliers and fostering long-term relationships, with 71% of its total FOB volume coming from suppliers engaged for over five years. The brand has integrated a comprehensive risk scoping approach that includes assessments of gender and freedom of association risks across its factories.

Marc O'Polo's systems for prevention and remediation are comprehensive, with specific action plans developed for each supplier, covering 100% of the total FOB. The member has shown proactive engagement in addressing human rights risks, including effective strategies for managing unauthorized subcontracting and ensuring compliance with Fair Wear's labour standards. Despite these efforts, challenges remain, particularly in mitigating excessive overtime and achieving living wage benchmarks.

Marc O'Polo sources from four production locations in Bangladesh with a production volume of 2% of its total FOB. The member company has signed the International Accord. While the member company has made considerable progress, ongoing challenges remain, particularly in fully integrating gender analyses into its human rights due diligence and in addressing wage disparities. The member is encouraged to continue its efforts to enhance transparency and to work collaboratively with other stakeholders to address these issues.

Marc O'Polo has made significant improvement, especially in enhancing labour conditions and adhering to Fair Wear's Code of Labour Practices (CoLP). However, realizing living wage goals and more effective social dialogue challenges remains ongoing.

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

Performance Category Overview

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

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

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

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

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

Company Profile Marc O'Polo SE

Member company information

Member since: [1 Jan 2020](#)

Product types: [Garments, clothing, fashion apparel, Accessories and Footwear](#)

Percentage of turnover of external brands resold [0%](#)

Member of other MSI's/Organisations [Amfori - BSCI](#)

Number of complaints received last financial year [11](#)

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
India	32	26.63%
Türkiye	19	20.97%
China	23	17.19%
Viet Nam	10	10.35%
Portugal	10	6.29%
Tunisia	6	4.63%
North Macedonia	6	2.68%
Bangladesh	4	1.73%
Italy	5	1.52%
Madagascar	1	1.4%
Ukraine	2	1.38%
Bosnia and Herzegovina	1	1.14%
Romania	4	1.09%
Bulgaria	2	0.93%
Spain	3	0.76%
Albania	2	0.7%
Indonesia	1	0.51%
Egypt	1	0.03%
Mauritius	1	0.02%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

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

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: Marc O'Polo discloses 93% of production locations internally through Fair Wear's information management system.

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

Comment: Marc O'Polo discloses 93% of production locations externally on Fair Wear's transparency portal.

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

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

Possible Points: 90

Earned Points: 82

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: Marc O'Polo has a sourcing strategy addressing labour conditions, encapsulated within its CSR Policy, which is integral to the wider sourcing strategy. This broader strategy also includes aspects such as pricing, quality, and supplier performance. The member now has the same amount (133) of active suppliers. 58% of the production volume comes from suppliers where Marc O'Polo has at least 10% leverage at suppliers. 30% of the production volume comes from suppliers where Marc O'Polo buys less than 2% of its total FOB. The member added more tail end suppliers and states that this is due to adding new suppliers that have a relation with or are part of existing suppliers. Marc O'Polo explicitly states that it wants to grow with its current partners and focuses on increasing influence through consolidation and active cooperation with other clients. Despite the sourcing strategy which includes consolidation, the brand added more new suppliers to its tail end.

Recommendation: Fair Wear recommends Marc O'Polo to consolidate its supplier base where possible and increase leverage at main production locations to effectively request improvements in working conditions.

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: Marc O'Polo has a sourcing strategy that focuses on maintaining long-term relationships. 71% of the member's total FOB volume comes from suppliers with whom Marc O'Polo has a business relationship for at least five years. The company has introduced an updated Manufacturing Agreement to solidify this approach. Marc O'Polo does not have long-term contracts yet. However, Marc O'Polo ensures the stability of orders through its purchasing planning. This strategy includes providing NOS (Never Out of Stock) programmes and carry-over articles to strategic suppliers, ensuring predictable orders. Top-level management frequently visits these primary suppliers to foster trust and deepen these relationships. To further support its sustainability commitments, Marc O'Polo has organized a Supplier Sustainability Summit in India, in collaboration with its Buying Leadership Team and strategic partners.

Recommendation: Fair Wear recommends Marc O'Polo to commit to long-term contracts. Marc O'Polo is also advised to embed long-term contracts in its sourcing strategy.

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.	Advanced	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.	6	6	-2

Comment: Marc O'Polo conducts risk scoping and includes all risk factors such as country-, sector-, business model-, sourcing model, and product-level risks. For Bangladesh, risks encompass long working hours, hidden sub-contractions, wage disparities between genders, and gender-based discrimination. In China, the risks identified include forced labour, excessive overtime, wage underpayment, restrictions on freedom of association, and sexual harassment. India's risk profile includes exposure to hazardous chemicals, high-pressure work environments, wage violations, and challenges related to the formation of trade unions. In Türkiye, the prevalent risks are sub-contracting, unregistered employment, specific issues affecting refugees, and restricted freedom of association. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly, including specific challenges in key sourcing countries. The risk scoping includes a gender lens. The member particularly focuses on integrating gender considerations into its analysis, applying a gender lens across all labour standards. However, it has not yet conducted gender-specific risk analyses for all countries, having prioritised this approach only for high-risk countries. Nevertheless, a gender lens is consistently included in country profiles, as well as in onboarding and monitoring of suppliers. Input from workers, suppliers, and stakeholders is incorporated into risk scoping through information collected from assessments, worker committee minutes, and on-site worker interviews conducted by the CSR team. The member company applies the same approach for its licensees.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding human rights risks in Pakistan, Cambodia, and Myanmar. Specifically, these results have led to the decision to designate these countries as 'no go' zones for sourcing due to their high-risk profiles.

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 Marc O'Polo to inform new suppliers about its Fair Wear membership by sending an information letter, a questionnaire with Fair Wear's Code of Labour Practices (CoLP), and the Worker Information Sheet (WIS). This process has been followed for all 14 new suppliers added last year. Additionally, the member company initiated a dialogue with suppliers about human rights and how cooperation can be enhanced on this topic. The CSR team conducts a virtual factory tour and discusses Marc O'Polo's Fair Wear membership and social compliance requirements. Should there be any questions regarding its Fair Wear membership, a separate meeting is arranged with the potential supplier to provide further information. An introduction presentation is also part of the process. All new locations are visited before production starts; these visits are conducted by either CSR or the buying department.

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.	Advanced	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.	6	6	0

Comment: Marc O'Polo collects human rights information of potential new suppliers by requiring them to submit self-assessments, existing social audit reports, and by organising Fair Wear assessments where necessary. This is an integral part of its CSR on-boarding process for new suppliers and factories, which mandates the provision of a valid social audit (BSCI or Fair Wear) and the follow-up of Corrective Action Plans (CAP) in the event of critical findings.

The member company actively adjusts sourcing decisions based on the gathered human rights information. CSR, along with Buying and Production teams, holds a bi-weekly Jour Fixe. If a new supplier or production location is under consideration, Buying & Production discusses the necessity with CSR, which then scrutinises the existing audit reports. Additionally, a video factory visit is conducted involving both Buying & Production and CSR, or the factory is visited directly by Marc O'Polo staff. The member also collects worker and stakeholder input.

Without the approval of CSR, a new supplier cannot be added. CSR retains the right to deny a factory based on the provided documentation or the outcomes of an (online) factory visit. To further enhance its due diligence, the member company has also established Country Risk Profiles, which are regularly updated using resources such as Fair Wear Country Studies, Fair Wear Gender Factsheets, Fair Wear Risk Policies, the CSR Risk Check, and Marc O'Polo's own Human Rights Risk Assessment. These profiles help in taking specific country risks into consideration when reviewing audit reports. The member also collects human rights information for suppliers of licensees or of partners in design collaborations. Moreover, Marc O'Polo's sourcing strategy privileges suppliers where workers are free to form a trade union and/or bargain collectively. The member company followed this process for all 14 suppliers added in the last previous year.

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: In the previous year Marc O'Polo has added 14 new suppliers. Marc O'Polo has 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 locations. Marc O'Polo organised onboarding sessions for workers and the management of new suppliers. The member organised nine Fair Wear onboarding sessions about the Fair Wear CoLP and the complaints helpline. The onboarding sessions included discussions to raise awareness about social dialogue for management. Workers were asked how they would like to provide feedback and report grievances to management about workplace issues. The selected nine factories were chosen based on the risk assessment.

Recommendation: Marc O'Polo is recommended to organise onboarding sessions specifically focusing on the CoLP and the grievance 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.	Advanced	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.	6	6	0

Comment: Marc O'Polo has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tool and frequency per country based on the outcome of the risk scoping. For instance, the brand assesses human rights risks in its production locations in countries that its risk scoping identified as having a higher risk of restricted freedom of association by conducting full or modular assessments, organising monitoring visits, sharing checklists related to freedom of association, and engaging directly with worker representatives. Marc O'Polo has an appropriate system in place to identify risks at Bangladeshi suppliers and has access to assessments of the Ready-made Garments Sustainability Council (RSC). The member has also signed the International Accord. Next to its systematic approach, the brand ensures it uses different tools that include input from workers, suppliers, and other stakeholders. These tools are the CSR evaluation process for existing suppliers & regular audits, CSR Country Risk Profiles, Gender Risk Analysis, Jour Fix meetings with agencies discussing current country situations, closely monitoring the Fair Wear newsletter for changing risk situations, regular supplier/factory visits by Marc O'Polo staff (with travel dates tracked in the Fair Wear Member Hub), and reviewing Fair Wear complaints to evaluate the risk identified for other factories. These combined efforts provide a comprehensive overview of potential human rights and environmental risks in the supply chain, helping Marc O'Polo to stay proactive and responsive to emerging challenges.

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).	Advanced	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.	6	6	0

Comment: Marc O'Polo has mapped the risks to Freedom of Association (FoA) in all its sourcing countries and can describe the main risks per country, including those faced by female workers. The identified risks include limitations on unionisation, challenges in effective worker representation, and barriers to collective bargaining, with a notable underrepresentation of women in worker representation and unions in countries like India, Türkiye, China, and Viet Nam. Marc O'Polo uses this information to comprehend the risks at its supplier sites and to guide its engagement with suppliers on FoA issues. The member company demonstrates a thorough understanding of FoA in all countries where it sources and is aware of the status of FoA at each of its suppliers.

To assess FoA and Collective Bargaining rights, Marc O'Polo conducts worker interviews during various activities such as assessments, training sessions, self-assessments, and onboarding sessions. Workers are encouraged to use factory complaint mechanisms if they encounter issues, and Marc O'Polo evaluates the effectiveness of these mechanisms through assessments and monitoring visits. Marc O'Polo requires all its suppliers to complete a survey that included questions on FoA, unionisation, worker representation, and Collective Bargaining Agreements (CBAs). This initiative helped the brand better assess risks and engage with suppliers more effectively. The member company conducts regular monitoring of its suppliers through audits and assessments covering the labour standard "FoA", uses Country Risk Profiles and studies to understand the work of unions and the specific risks associated with FoA in each country. Additionally, suppliers in Tamil Nadu, India, participated in the STITCH seminar on social dialogue, aimed at enhancing social dialogue at the supplier level.

Marc O'Polo reviews assessments on FoA through an external party for every supplier concerning worker representatives and trade unions, and regularly conducts visits that include interviews with worker representatives or trade union representatives and members. This approach allows Marc O'Polo to discuss identified risks with production locations and understand the root causes per facility, ensuring that appropriate steps are taken to address these risks.

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.	Advanced	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.	6	6	0

Comment: Marc O'Polo has included gender in its human rights risk identification. The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified gender discrimination and unequal pay as important risks prevalent in countries such as India and Viet Nam. Additionally, Marc O'Polo actively collects gender data per factory. Data that it collects include the number of female workers in leadership roles, gender wage gaps, and instances of gender-based discrimination. This information is collected through tools such as external assessments and country-specific gender fact sheets included in the country risk profiles. Marc O'Polo has started to analyse the collected gender-disaggregated data at the factory and country levels. Main conclusions so far indicate that there are significant disparities in the representation of women in supervisory positions and in wages between genders. The member has not yet specifically looked into how its business practices affect gender at its suppliers. Gender equality is treated as a strategic separate topic for the coming years in the sustainability strategy, with actions including continuous gender risk assessments for each Code of Labour Practice.

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: Marc O'Polo has a strong and systematic evaluation system for assessing suppliers' human rights performance. This system is thorough due to its integration of CSR performance evaluations, which for the social evaluation, are based on audit and assessment results and the follow-up of Corrective Action Plans (CAPs). It also includes an escalation process for addressing significant issues with existing suppliers. The member has also collected information about the human rights performance of the production locations used by its licensees. Marc O'Polo systematically incorporates the outcomes of these evaluations into its purchasing decisions, ensuring that its sourcing choices are informed by the latest data on suppliers' compliance with human rights standards. However, Marc O'Polo has not yet shared the outcomes of these evaluations with its suppliers and their worker representatives, which would be a step towards greater transparency and collaborative improvement in human rights practices across its supply chain.

For new production countries, the member undertakes a country risk assessment for every new production country and facility. This assessment collects information about the human rights situation and associated risks, which informs the decision-making process regarding sourcing from these locations.

Recommendation: Fair Wear recommends Marc O'Polo to share and discuss the outcome of the supplier evaluation with the supplier's 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: Marc O'Polo uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations or subcontractors in the database. The member takes measures to prevent unauthorised subcontracting or unknown locations by requiring all suppliers to provide detailed factory and capacity information annually, which Marc O'Polo checks during the ordering process to ensure that the need for subcontractors is avoided. Unauthorised subcontracting is explicitly prohibited in the manufacturing agreement, and a warning letter is issued in cases where this policy is breached. Additionally, Marc O'Polo ensures it knows all production locations, including subcontractors, by conducting visits to production sites by its CSR team as well as Buying and Production staff.

Annual training for the Buying and Production team on the Health and Safety (H&S) Checklist includes awareness-raising to ensure all necessary processes are followed for the production of relevant products. When on-boarding a new supplier, detailed supplier and factory profiles must be provided for all steps involved in the production. When onboarding a new supplier, detailed supplier and factory profiles must be provided for all steps involved in the production. Marc O'Polo addresses subcontracting in its license partner requirements by requesting a complete factory overview.

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: Marc O'Polo has identified whether homework is prevalent in its sourcing countries. According to the member there is a very low risk of homeworkers being used by its suppliers because all products the brand develops require heavy machinery. The brand can prove the low risk for most of its suppliers through its regular on-site presence by its agents and business partners during monitoring visits and the checking of employment records and factories' policy on homeworkers. Furthermore, assessments have not identified homeworkers in Marc O'Polo's supply chain.

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.	Advanced	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.	4	4	0

Comment: Marc O'Polo uses contracts with its suppliers. The member has agreements in the form of a manufacturing agreement that stipulate terms of payment, liabilities, and penalties. Payment terms are up to 30, 45, or 60 days upon delivery. Only if the member company can prove a delivery delay is the fault of the supplier will penalties be charged. The contract stipulates that in case of damages/warranty claims, the member and supplier must agree on who is responsible before any financial action is taken. These contracts support the implementation of human rights due diligence by incorporating the Code of Labour Practices (CoLP) and Marc O'Polo's Code of Conduct as binding components of the manufacturing agreement. Additionally, the contracts clearly outline the shared responsibilities of CoLP implementation, and fair payment terms are part of that. For instance, contracts include provisions for checking the possibility of prepayments if required, ensuring payments are made on time, and setting penalties only after consultation with the supplier and mutual agreement.

Licence partners are also integrated into this framework. All licencees have signed Marc O'Polo's Code of Conduct, which is part of the License Agreement. There is a requirement for licencees to ensure that all suppliers in risk countries must have a valid BSCI audit. Licencees must have a system in place to follow up on the Corrective Action Plans (CAPs).

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

Comment: Marc O'Polo actively shares relevant CSR information with other departments. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, mandatory training on Responsible Purchasing Practices (RPP) is included in the job description of employees from Design, Product Management, Buying, and Planning. The member includes responsible business practices in job role competencies. For instance, job role description mentions compliance with responsible sourcing practices and that the role requires training to adhere to these practices.

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: Marc O'Polo is a fashion brand that releases four main collections each year, with products being delivered three times per season, leading to monthly deliveries. The brand has enhanced its production process by implementing the Collection Re-Design Structure and incorporating a detailed seasonal production planning approach. This process involves long-term capacity planning to detailed style and order planning, where suppliers' production capacities are considered throughout the entire planning process. Materials are ordered at an early stage on Marc O'Polo's risk to align with production lead times, ensuring timely availability for manufacturing. The brand has adjusted its sell-in strategy for Outerwear and now places orders every three weeks for Never Out of Stock (NOS) items instead of weekly. Additionally, Factory Outlet orders are used strategically to balance seasonal production and fill low production periods, with the timing of these orders now set 3-4 months prior to seasonal orders. Marc O'Polo has redefined its on-time delivery in the previous financial year by implementing a delivery report for both internal and external communication of status. This approach to production planning and supplier engagement helps the member company to ensure that available and required capacities are compared and aligned multiple times throughout the process. The member brand evaluates the production planning with its suppliers structurally.

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: Marc O'Polo has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Marc O'Polo has advanced insight into the labour component of its prices. Marc O'Polo knows the labour minute value at its strategic partners, but some suppliers remain reluctant to share information or work in the Fair Price App. The member has redesigned the Open Costing sheet to include labour costs as a separate position, a project led by the buying team with supervision from the CSR team. This was carried out to incorporate labour minute costs as well as standard working minutes in the Open Costing sheet based on the Fair Wear methodology. Additionally, the member has re-worked its evaluation of the wage data from the existing Fair Wear assessments. Some Indian suppliers and agencies participated in the Fair Price App training in Coimbatore to get support in how to calculate the labour minute.

Recommendation: Marc O'Polo is recommended to investigate why some suppliers are reluctant to work with Fair Price App or any other form of fact-based costing, if needed, with the support of Fair Wear's local teams.

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: Marc O'Polo has informed 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 supporting in CAP follow-up, checking capacity at the factories, reporting back on any issues to the brand. The member checks if its intermediaries uphold the purchasing practices as mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Layer 3 Prevention, mitigation and remediation

Possible Points: 96
Earned Points: 74

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: Marc O'Polo has prioritised risks and created action plans for each supplier, accounting for 100% of the total FOB, which match the risk profile. The member company has successfully integrated the Accord Bangladesh Safety Program into action plans for its suppliers in Bangladesh and collaborates on joint prevention, mitigation, and remediation with the RSC and signatories of the International Accord. Additionally, the company follows up closely its own corrective action plans (CAPs), which are action plans based on the risk assessment, not to confuse with audit CAPs. Observations from follow-up visits and the CAPs are formalised. The member company also takes follow-up actions on gender, such as capacity building and checks female representation in different committees.

Marc O'Polo is a signatory of the International Accord since 2024, and all suppliers in Bangladesh are covered by the RSC. The member company has started to follow up on the remediation process at its suppliers and works on joint prevention, mitigation, and remediation with the RSC and signatories of the International Accord.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Intermediate	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.	4	6	0

Comment: Marc O'Polo has incorporated a gender lens into its improvement and prevention strategies. The company includes a gender lens in its entire range of improvement and preventive actions. This starts at the inclusion of a gender lens in country profiles, which identifies gender-specific challenges and opportunities within each sourcing location. Additionally, gender considerations are integrated into the onboarding procedures for new suppliers. Specific actions taken by Marc O'Polo include organizing training on Workplace Engagement and Prevention of Violence and Harassment (WEPVH) for suppliers in high-risk countries. This training is part of the audit and training plan aimed at addressing gender-specific risks. Marc O'Polo also monitors female participation in workers' participation committees to ensure women's involvement in workplace governance. Furthermore, the follow-up on corrective action plans (CAPs) includes a focus on gender-related issues such as childcare facilities and equal wage payment. Finally, the member brand has also organised training focused on women's empowerment in India. This training targeted supervisory skills, as the brand identified that one reason for gender pay disparities was that women were less likely to hold supervisory positions.

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.	Advanced	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.	6	6	0

Comment: Marc O'Polo included comprehensive steps to encourage Freedom of Association (FoA) and effective social dialogue in all its action plans. The member has started implementing these steps, which include the participation of Indian suppliers in the STITCH training about social dialogue, with 70% of the participants being Marc O'Polo suppliers. Further steps involve direct engagement during audits or visits where, if it is found that worker representatives are selected without proper elections, the member discusses or reviews with the factory management the need to conduct a fair election or to review the entire election procedure. Marc O'Polo monitors suppliers on FoA and engages in discussions with Trade Union or Workers' Protection Committee members during visits to ensure ongoing compliance and dialogue.

Additionally, the member has conducted training on Factory Dialogue. Marc O'Polo has also conducted surveys on FoA and Workers Participation Committees as well as on grievance management, which help the brand in assessing and further developing effective communication channels between workers and management. These initiatives are part of Marc O'Polo's actions to strengthen social dialogue.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Intermediate	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.	4	6	0

Comment: Marc O'Polo actively supports and monitors the effectiveness of factory-level grievance mechanisms. Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship or are monitored systematically every year. The member conducts regular checks during visits, meetings, and through audits and assessments, including BSCI audits and Fair Wear assessments, to ensure functional grievance mechanisms are in place. During factory visits, the member proactively checks the grievance committee, suggestion boxes, and the minutes from the workers' representative committee meetings. Specific visits in 2024, such as to Türkiye and Viet Nam, included monitoring the internal grievance channels. The visit report from China in 2023 focused on evaluating the grievance procedures in place. Following its visit procedure, Marc O'Polo conducts interviews with Trade Union (TU)/Workers' Protection Committee (WPC) and Grievance Committee members to discuss the grievance procedure and ensure it is correctly implemented. Internal training for Marc O'Polo Buying & Production teams includes sessions on the Health and Safety (H&S) Checklist, which covers internal grievance boxes and Worker Information Sheets (WIS). This training was organized for new employees in 2024.

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: Marc O'Polo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Next to that, the member also cooperates in taking more preventive measures, such as organising training. At suppliers that are not shared with other members, Marc O'Polo works together with other customers.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	70%	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.	6	6	-2

Comment: During the performance check, Marc O'Polo could demonstrate it has followed up more than two-thirds of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. Most resolved actions pertain to workplace safety and labour practices, while actions on some other labour standards are still outstanding. Marc O'Polo could demonstrate progress on action plans for its Bangladeshi suppliers and could also demonstrate a financial contribution to preventive, mitigative, and remediating actions. For all audits and assessments, Marc O'Polo reviews and monitors CAP progress with suppliers on a monthly basis and tries to follow the timeline with activities such as CAP sharing and asking for progress updates, monitoring CAP progress, discussing critical issues with factory management, the buying team, and visiting suppliers to cross-check CAP status during supplier visits. Examples of actions taken include follow-ups during monitoring visits to Türkiye, China and India. These follow-ups were part of the regular review of CAP progress and involved direct interactions with the factory management to ensure compliance and address any critical issues. The CAP issues that are still open are issues that are more complex or structural and therefore need more time to be remediated. These include deeper systemic changes within supplier operations that require ongoing support and monitoring to ensure effective resolution.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Advanced 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.	6	6	-2

Comment: Marc O'Polo has identified some root causes of the CAP issues and discussed these with its suppliers. The member has implemented some preventive steps. Examples of the discussed root causes include issues in worker representation and grievance handling, and the member implemented preventive steps such as organizing training according to risk assessments, audit findings, and visit observations to address these root causes. Marc O'Polo shares CAP progress requests regularly, maintains monthly Jour Fixes agendas and minutes, and discusses critical issues with intermediaries, factory management, and the buying team. Follow-up actions from visit findings are integral to ensuring the efficacy of implemented CAPs. Additionally, Marc O'Polo conducts surveys and data collection on Freedom of Association (FoA), and exchanges and follows up on audit, CAP, and critical topics with other brands and Fair Wear Foundation member brands.

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.	Advanced	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.	6	6	0

Comment: Marc O'Polo has some suppliers where improvement or prevention steps are not needed. However, the member company considers these suppliers as all other suppliers. Marc O'Polo has suppliers where no preventive or improvement steps are needed as they are located in countries where the risk analysis shows very low risk of adverse impact, but it treats them the same as its suppliers in other countries, as it also commissions audits, follow-up on CAPs, and organise monitoring visits. The member company has continuously worked on follow-up and also visited some of those suppliers.

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: In the previous year, four reports of the total six Fair Wear assessments mention excessive overtime. Marc O'Polo analysed the root causes of these findings. The findings included inconsistencies among production records, information from workers' interviews, and attendance records, which made it challenging to verify the work hours accurately. For instance, despite production records indicating activities on certain dates, the corresponding attendance records showed that workers were off duty. Additionally, some workers reported only having two days off during the busy season, potentially leading to consecutive work days extending beyond a week.

In response to these findings, Marc O'Polo has taken action to address the root causes by enhancing its production planning system as well as accepting late shipments and planning for longer lead times to reduce pressure on production schedules. The member coordinates closely with its buying department to allow more time for order placements, helping factories manage their schedules more effectively. Marc O'Polo also holds monthly meetings with suppliers and agencies that focus on CAP progress and monitoring human rights risks. Additionally, the member company follows-up on overtime issues during factory visits by the CSR Team.

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, five out of six Fair Wear assessments included findings regarding non-payment of the legal minimum wage or legally required wage elements. The findings included inconsistencies among document reviews, production records, and workers' interviews, which made it challenging for the audit team to fully determine the wage situation. Specifically, some workers reported being paid piece-rate wages without compensation for annual or statutory holiday leave. Additionally, discrepancies in payroll records suggested that some workers were paid below the local minimum wage, and overtime premiums were not properly compensated. Marc O'Polo responded immediately to these findings by setting up a wage verification assessment to compare the workers' gross wages with their 'due hourly wage' to ensure sufficient payments covering the local minimum wage and overtime premiums. This includes a review and correction of wage systems at the factories to ensure compliance with legal requirements. The member has also improved its monitoring efforts, including more frequent factory visits and detailed audits to address these wage discrepancies systematically. While the brand has showed that all issues were addressed, some need more time to remediate.

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: Marc O'Polo has a basic overview of the wage levels at its suppliers. Marc O'Polo has yet to create an overview of the wage levels at its suppliers and the gap towards the estimated living wage. The member brand already started to link its policies and actions to wages by its suppliers. Marc O'Polo followed up on this and reviewed internally how the member's purchasing practices could be altered and has yet to implement this.

The actions taken include conducting a Responsible Purchasing Survey to assess the relationship between wages, prices, and buying practices, and engaging almost all suppliers in India in training for the Fair Price App to systematically collect information about labour minute costs. Additionally, Marc O'Polo has initiated a project to systematically gather data on labour costs, ensuring transparency and accuracy in costing.

Further actions include training on responsible purchasing practices (RPP) for the design, product ,anagement, buying, and planning teams to align internal processes with ethical sourcing standards

Recommendation: Fair Wear recommends the member to enrol in the learning module 'Getting started with living wages'. Members can help suppliers maintain their wage levels by, for instance, linking them to relevant governmental support programmes, or offering pre-payments or loans.

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: Marc O'Polo has started to address the topic of living wage internally by initiating plans to conduct a living wage gap analysis and establish an open costing project. These plans are aimed at systematically assessing the financial implications of implementing a living wage across its supply chain. The member has not discussed wage increases with its factories yet and does not have an overview of wages paid in production locations. Moreover, Marc O'Polo has begun planning for the costs of financing wage increases. Marc O'Polo has a strategy on how to finance wage increases at its suppliers but has yet to implement it. The member has yet to include worker representation in its action plans to finance wage increases.

Recommendation: Marc O'Polo should analyse what is needed to increase wages and implement its strategy to finance the costs of wage increases. In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

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: Marc O'Polo does not contribute to higher wages at any of its production locations.

Requirement: Marc O'Polo is expected to begin setting a target wage for its production locations.

Recommendation: Fair Wear recommends Marc O'Polo to conduct a root cause analysis to check how it is possible that the paid wages are not above a living wage benchmark while the brand calculates with this benchmark in its pricing and has high leverage.

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: Marc O'Polo received 11 complaints in the past financial year about no discrimination, safe and healthy working conditions, legally binding employment relationship, reasonable hours of work, employment is freely chosen and freedom of association (FoA) at its suppliers in North Macedonia, Türkiye, India and China. The member actively responded to these complaints as per Fair Wear's Complaints Procedure. In response to complaints, Marc O'Polo's CSR representative visited several factories to assess working conditions and engage with worker representation, workers, and factory management to emphasize the importance of proper grievance procedures and the need for appropriate remedial actions.

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

Comment: Marc O'Polo has some CAP findings where training is a recommended follow-up action. The member has enrolled most of its suppliers with findings on freedom of association, no discrimination and no awareness of code of labour practices (CoLP) in the following training modules: workplace education programme (WEP) basic and onboarding module, WEP violence and harassment prevention programme and WEP factory dialogue program. Even though it is not part of a CAP, Marc O'Polo has implemented training at three suppliers in India, on women empowerment, and women safety and factory dialogue for management.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Intermediate	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.	4	6	0

Comment: Marc O'Polo followed up on the implemented training by sharing reports with suppliers, conducting follow-up meetings after training sessions, and engaging directly with workers during site visits to discuss the outcomes and gather feedback. The company also reviewed evidence of training effectiveness to ensure the impact was properly assessed. While these steps have helped to reinforce training outcomes, there are still some aspects that need further attention and resolution.

Recommendation: We encourage Marc O'Polo to expand its follow-up after training.

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.	Intermediate	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.	2	4	0

Comment: Marc O'Polo's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member stopped with 23 suppliers. The member followed the steps in the responsible exit strategy. The member company has yet to communicate its responsible exit strategy with all its suppliers.

Recommendation: Marc O'Polo could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation.

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.	Basic	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.	2	6	0

Comment: Marc O'Polo undertakes activities related to human rights that go beyond Fair Wear's scope, namely participating in a raw material project with Fair Labor Association (FLA) where the member company alongside other buyers aims to improve the lives and working conditions of workers in cotton harvesting in India.

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: Marc O'Polo communicates accurately about Fair Wear membership on its website. The member brand has also developed materials about Fair Wear membership and shared it with retailers.

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: Marc O'Polo does not sell external brands.

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

Comment: Marc O'Polo has submitted its social report, which Fair Wear approved. Marc O'Polo has also published the report on its website.

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

Comment: Marc O'Polo published its social report, which includes some factory-level data and remediation results, on its website. Marc O'Polo discloses its full factory list but has yet to disclose the factories' time-bound improvement plans.

Recommendation: Fair Wear recommends Marc O'Polo 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: Marc O'Polo has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. If that is not the case, the member adapts its approach, for instance, by offering specific training. The information used for this evaluation comes from full assessments that include worker and stakeholder input. Management is involved in the evaluation.

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

Comment: The previous performance check included the following requirements: Marc O'Polo is expected to begin setting a target wage for its production locations and should analyze what is needed to increase wages, as well as develop a strategy to finance the costs of these wage increases. While the member brand has started to address these requirements and develop a strategy on how to address them, actions still need to be implemented.

Recommendation: Marc O'Polo 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: Marc O'Polo actively contributed to industry outreach, visibility, and learning through various engagements in its main selling markets. The company participated in an interview with Textilwirtschaft and spoke at several key events, including the Fashion Transparency Summit in Amsterdam, where it discussed transparency, communication, and data. At the Hugo Boss Stakeholder Day, it focused on circularity in fashion. Marc O'Polo also presented on circular business models at the Sustainable Apparel & Textiles Conference and discussed cultural credibility in sustainable fashion at S Talks Amsterdam. Additionally, it shared insights on sustainability communication at the TW Sustainability Summit and unveiled its new sustainability strategy at the Sustainability Talks in Istanbul. Furthermore, the company engaged in a peer learning group at the Bavarian Chamber of Industry and Commerce in Munich, focusing on managing high-risk suppliers. These activities underline Marc O'Polo's commitment to leading sustainability discussions and advancing industry standards.

Recommendations to Fair Wear

The member company has signed the International Accord and is seeking clarity on how the complaints helpline from the Accord integrates with Fair Wear's grievance mechanism. Additionally, the member has expressed concerns that the handling of complaints is overly protracted.

Brand Performance Check details

Date of Brand Performance Check: 03-02-2025

Conducted by: Jason Mandels

Interviews with: Lissa Erlenkötter - Division Head Sustainability & Corporate Responsibility

Sara Strödel - Group Manager Corporate Social Responsibility

Rahima Aktar – Senior Manager Corporate Social Responsibility

Jakob Wiens - Junior Manager Corporate Social Responsibility

Isabelle von Watzdorf - Director Buying & Production

Marek Lachmann - Head of Buying & Production Woven

Rachael North - Head of Buying & Production Knit, Jersey & Accessories

Marvin Beitzel - Group Expert Supply Chain

Anett Jeske - Head of Accounting National