



# **Brand Performance Check**

**DAWN GmbH**

**Publication date: December 2023**

This report covers the evaluation period 01-01-2022 to 31-12-2022

## 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: 144

Possible score: 180

Benchmarking Score: 80

Performance Benchmarking Category: Leader



## Summary:

DAWN GmbH (DAWN) has shown good results on performance indicators and has maintained its Leader status. With a total benchmarking score of 80, the member is placed in Leader category.

DAWN's sourcing strategy shows the company's commitment to long-term relationships and jointly improving labour conditions but has yet to introduce contracts that solidify this strategy. The sourcing strategy was last revised in 2022 and aligns with OECD guidelines on human rights due diligence. DAWN holds a unique position because it shares the same owner as its sole factory. The factory's owner founded DAWN to address existing gaps in production capacity. These gaps persisted despite effective production planning with customers at the factory, prompting the creation of DAWN as a means to bridge those remaining gaps.

DAWN conducts a thorough risk-scoping assessment at the country level, but it falls short of encompassing all eight labour standards. Although the member diligently evaluates the impact and prevalence of risks, there's a notable omission concerning specific risks associated with each Code of Labor Practices. While DAWN demonstrates a keen understanding of the most pressing risks in its sole production country, it has yet to incorporate child labour, forced labour, and health and safety into its risk-scoping exercise.

Gender considerations are embedded within the member's risk-scoping framework, addressing issues like gender-based harassment, violence, and discrimination. However, the brand has not yet fully integrated a gender perspective into all aspects of its labour code practices. Within its risk-scoping process, the member brand actively engages with worker representatives, gathering insights from the worker committee and monitoring an onsite suggestion box. The worker committee and the trade union play vital roles in overseeing this suggestion box.

DAWN has done a lot of work to ensure its practices align with the OECD guidelines on Human Rights Due Diligence (HRDD) and seems well-placed to improve its practices and work on the implementation of prevention and improvement programmes further in the coming years.

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 DAWN GmbH

## Member company information

Member since: 1 Jan 2018

Product types: Garments, clothing, fashion apparel

Percentage of CMT production versus support processes 100%

Percentage of FOB purchased through own or joint venture production 100%

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 0%

Percentage of turnover of external brands resold 0%

Are vertically integrated suppliers part of the supply chain? No

FLA Member No

Member of other MSI's/Organisations PETA,

Number of complaints received last financial year 0

## Basic requirements

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

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

Membership fee has been paid? Yes

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

Production Country	Number of production locations	Percentage of production volume
Viet Nam	2	100%

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 7**

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1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.:  
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: DAWN discloses 100% 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:** DAWN discloses 100% of production locations externally on Fair Wear's transparency portal.

**1.8 Member complies with the basic requirements of Fair Wear's communication policy.:** No

**Comment:** According to Fair Wear's member brand communication guide, members can adapt the Fair Wear logo when using it. The colour may also be adjusted to match the corporate branding. However, it is explicitly stated that member brands should not change the font style.

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

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

**Possible Points: 78**

**Earned Points: 56**

### 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.	Intermediate	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.	4	6	0

**Comment:** DAWN is part of the Evolution3 group. DAWN does not have a sourcing strategy aimed at improving labour conditions. However, its unique position arises from the brand being created to support the factory owned by the same group. The factory's sourcing strategy outlines its intention to increase production through DAWN, reducing its dependence on other brands. DAWN's foundational principle and brand ethos revolve around enhancing factory working conditions. This commitment has been a consistent part of DAWN's internal communication with Evolution since its inception. Key actions include adjusting the DAWN sourcing calendar to match Evolution's Sample- and Production Calendar and actively engaging in efforts to foster better communication between management and workers. Despite these efforts, there was no formal contract signed between Dawn and Evolution, as it was believed unnecessary given the clear mutual understanding of the commitment.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Intermediate	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.	4	6	0

**Comment:** Since the start of DAWN, all its products have been made at its own production facility. However, with Evolution3 providing loans to DAWN, there are clear financial ties between the two entities, emphasising a strong indication of a lasting business partnership. Nevertheless, the member brand acknowledges the substantial advantages of having a contract between both parties. DAWN has yet to commit to long-term contracts.

**Recommendation:** Fair Wear recommends DAWN to commit to long-term contracts. DAWN 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.	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:** DAWN conducts risk scoping on sourcing country level but has not included all eight labour standards. While the member has assessed the impact and prevalence of the risks correctly. The member has assessed the impact and prevalence of the risks correctly.

DAWN could show that it knows the highest risks for its only production country but has yet to include child labour, forced labour and health and safety as part of its scoping exercise.

Gender is considered within the member's risk scoping exercise, addressing issues related to gender-based harassment, violence, and discrimination. Nevertheless, the brand has not yet integrated a gender perspective into all aspects of its labour code practices.

In its risk-scoping exercise, the member brand includes information that it collects from worker representatives. It does so by engaging with the worker committee as well as by monitoring an onsite suggestion box. The worker committee and the trade union also monitor the suggestion box.

While it may state the obvious, namely that DAWN's sourcing model is to only source from its own factory and increase its production at this factory, the brand has not yet done a risk scoping on the business model, sourcing model, sector level and product level.

**Recommendation:** Fair Wear recommends DAWN to include all risk factors in its risk scoping, including the business model, sourcing model, sector level and product level. DAWN is recommended to include a risk scoping on the business model, sourcing model, sector level and product level.

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:** DAWN only produces at its own factory. DAWN has a close relationship with its only factory, and regularly exchanges about the Fair Wear membership requirements. Since the start of DAWN no other supplier was onboarded. While the brand does not have any plans to onboard new suppliers, the brand has an onboarding process in place for potential suppliers. This includes sharing Fair Wear membership information, the Fair Wear Code of Labour Practices and the Worker Information Sheet.

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.	2nd+ year member and no new production locations selected.	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.	N/A	6	0

**Comment:** DAWN did not onboard any new supplier in the past year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	No production locations in the first year of business.	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.	N/A	6	0

**Comment:** DAWN did not onboard any new supplier in the past year.

## 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 monitor human rights risks in its supply chain.	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:** DAWN consistently identifies human rights risks within its supply chain and has evaluated them at each production location. The brand has collected audit reports that were commissioned by other brands to monitor its factory and established the required monitoring frequency. Because of its unique structure, any monitoring that has and will be conducted at Evolution3, will impact the risk assessment of DAWN. The member brand has full access to all monitoring audits conducted at its factory. DAWN also has a local team that provides monitoring information to the brand.

DAWN's distinctive supply chain structure enables the brand to incorporate input from workers into its risk assessment process directly. Within its factory, DAWN maintains a dedicated team of CSR staff focused on social compliance throughout the year, ensuring vigilant oversight of the factory's conditions.

**Recommendation:** DAWN needs to expand and vary its monitoring methods to timely identify any potential risks, allowing the brand to respond promptly.

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

**Comment:** DAWN has mapped the risks to FoA in Viet Nam and can explain the main risks for this country. In its risk assessment, DAWN reviewed whether worker representation and/or unions are active in the factories. However, the member brand did not specifically assess the risk to women workers exercising the right of FoA.

**Recommendation:** DAWN 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 their continuous monitoring of human rights risks, 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:** DAWN demonstrates a fundamental understanding of gender-related risks in its sourcing country, Viet Nam. However, as indicated in indicator 2.3, the company has not yet incorporated a gender perspective into the risk scoping of all CoLP. Regarding gender data collection per production location, DAWN initiated this process within its facilities in Viet Nam. DAWN utilises audit information that is accessed through its factory and includes gender-disaggregated information on the workforce, turnover, and absenteeism. The company intends to expand its data collection efforts.

However, it's important to note that DAWN has not yet conducted an in-depth analysis of the collected gender-disaggregated data at both the factory and country levels, indicating an area where further progress is needed.

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:** DAWN does not evaluate its suppliers' human rights performance as a separate process. However, because of its unique supply chain structure, the overall collaboration is evaluated so that human rights and social compliance make up a great part of the way the business is conducted. DAWN only produces at its own factory.

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:** DAWN uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. The member brand has a policy in place that effectively prevents the factory from engaging in unauthorised subcontracting. This robust oversight is made possible because both companies, the member brand DAWN and its factory, share the same owner. The owner has access to all factory invoices and can readily identify any instances of unauthorised subcontracting. It's important to note that while subcontracting may occur for other customers at the factory, DAWN has steadfastly maintained a strict policy against such practices.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Insufficient	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.	0	4	0

**Comment:** According to the member there is a very low risk of homeworkers being used by its suppliers because it has full control over its production process. This means that every process that is outsourced, is known to the factory and the brand. The member brand stated that, for a particular capsule collection, they utilise embroidery, which is a process outsourced to a third party. DAWN knows which products require homeworkers but has yet to scrutinise the workplace for human rights risks.

**Requirement:** DAWN should identify whether homeworkers are used by its suppliers and assess if there is a risk of exploitation.

**Recommendation:** Fair Wear recommends DAWN to conduct a capacity analysis looking into specific production processes to validate the suppliers' statements that no homeworkers are used.

## 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.	Insufficient	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.	0	4	0

**Comment:** DAWN has not yet implemented a contract with its supplier. The brand is presently collaborating with its legal team to draft a formal contract. Given that both the factory and the member brand are under the ownership of the same holding company, the payment terms are tailored to suit the best interests of each entity. It's important to highlight that worker wages are paramount in determining optimal cash flow management. In a particular instance, the owner extended personal financial support to the factory when another customer failed to make payments for an extended period of over five months. Payments are directly made from the brand to the factory.

**Requirement:** DAWN needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence.

**Recommendation:** DAWN 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 their decision-making processes.	Advanced	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	6	6	0

**Comment:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The job description for the CSR manager emphasises skills in responsible business practices, focusing on strategies such as progressively improving living wage standards, diligently overseeing planning and overtime, and actively promoting women's participation in workers' committees. However, since most of it is obvious for the member brand and its employees, it has yet to be explicit in Key Performance Indicators (KPIs).

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

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

**Comment:** Considering DAWN's supply chain structure, the company has the capability to examine its direct impact on working hours thoroughly. The production facility possesses comprehensive access to production planning, and the materials purchasing team is located at the factory in Viet Nam. This close proximity allows the production and laundry facilities to collaborate closely and coordinate planning efforts.

Furthermore, DAWN's design team in Berlin collaborates with the development team in Viet Nam right from the initial stages of development. This collaborative approach enables both teams to schedule sampling and anticipate the number of styles for the upcoming season. DAWN has also optimized its shipping strategy, reducing the number of shipment windows from four to five to just two to three per season, effectively preventing bottlenecks.

In its analysis, DAWN evaluates the minutes needed per style associated with the overall production capacity. The factory enjoys flexibility in assessing styles and determining the most efficient production start times based on their capacity. Recognising that a high number of different styles within an order can lead to excessive overtime, the brand has adjusted its seasonal production focus. Instead, DAWN places greater emphasis on "Never Out of Stock" and basic items, thus reducing the likelihood of overtime issues.

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.	Advanced	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.	6	6	0

**Comment:** DAWN can demonstrate the link between its buying prices and wage levels at production locations. DAWN has complete access to the payroll information of its factory, allowing the company to assess how FOB prices correlate with wage payments. Labour costs are calculated as the total employee salaries divided by the total number of products produced in a month. DAWN maintains a detailed breakdown of all input costs and is well aware of the labour costs involved.

In an effort to enhance transparency, DAWN proposed to other brands sourcing products from the same factory to implement a clear and open cost breakdown system. While the FOB price remains fixed, various factors during production and shipping can affect costs, such as unexpected air freight or material cost increases. DAWN suggested that other brands adjust their pricing structures to accommodate unexpected cost fluctuations whenever they arise. Although the proposal was positively received in principle, the other brands ultimately chose not to adopt this approach. Additionally, DAWN's relatively smaller production quantities result in less production efficiency, which contributes to the higher FOB price.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding 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:** DAWN's sourcing model purposely excludes the use of sourcing intermediaries.

## Layer 3 Prevention, mitigation and remediation

**Possible Points: 80**

**Earned Points: 70**

### 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 prioritisation and follow-up programmes according to the risk profile.	Advanced	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	6	6	0

**Comment:** Based on several audits at the member brand's factory, the member brand created its risk assessment. The factory, and thus the member brand, have access to a follow-up plan that followed from the risk assessment. Based on the risk identification as described in chapter two, DAWN has linked factory risks to appropriate follow-up for factories covering 100% of FOB. During the performance check a random sample was selected. DAWN could show that it prioritises actions that match the highest identified risks, including training on rights awareness and targeted action on social dialogue (see indicator 3.3).

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes 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:** DAWN started collecting gender data at its production location but has yet to apply the gender lens to all topics (CoLP) in the improvement and prevention programme. The collected data shows gender-disaggregated information on the workforce, turnover, and absenteeism. The member brand analysed if there were discrepancies and used this information for its follow-up plan. The brand monitors if training HR and staff uphold policies and verifies and validates this through internal checks.

**Recommendation:** The member is encouraged to include a gender lens in all its improvement and prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Intermediate	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.	4	6	0

**Comment:** DAWN has included steps to encourage Freedom of Association (FoA) and effective social dialogue (SD) in its improvement or prevention actions. This action followed from the risk assessment. The member brand has included the promotion of FoA in its sourcing strategy. The member has formalised these actions in its recruiting policy and actively reminds workers about their rights with information pamphlets and by organising awareness trips. In 2022, it enrolled its only supplier in the Workplace Education Programme (WEP) Communication module. DAWN has also invested in creating a culture where workers understand that they can speak their minds by organising staff parties and to promote the worker committee.

**Recommendation:** Fair Wear recommends DAWN to be more comprehensive and include more steps to promote FoA and effective social dialogue in its improvement and prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal 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:** Suppliers’ internal grievance mechanisms are monitored throughout the year. The member brand monitors the internal grievance mechanism through auditing and engages with worker representation about it. DAWN follows up on issues related to factory-level grievance mechanisms when they come up in CAPs. The member brand has shown follow-up for CAP-findings where the internal grievance mechanism was not up standard by creating awareness through internal training for the workers.

**Recommendation:** Fair Wear recommends DAWN to always involve its factory 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:** No other Fair Wear members source from the same supplier. DAWN cooperates with other brands that are not Fair Wear members at its shared suppliers, responding to CAPs and complaints.

### Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	67%	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:** In the past financial year, DAWN has received two external audit reports from Amfori BSCI. During the performance check, the member could demonstrate with a sample that more than two third of the CAP issues requiring improvement actions have been followed up. Improvement actions relate primarily to health and safety findings and workers' involvement and protection.

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:** DAWN has identified all root causes of the CAP issues and discussed these with its supplier. DAWN has identified two main causes at the root of several CAP findings, especially related to occupational health and safety and workers involvement and protection. DAWN also identified the lack of workers' awareness on their rights as a root cause to ineffective social dialogue. DAWN addressed this by speaking to the worker representation and setting up training to raise worker awareness. It has also organised a team outing to create a safe environment where workers are encouraged to share grievances or tips to improve working conditions. The member brand also agreed on an extra person for the worker committee as they found that the current number of worker delegates are not representative of its total workforce.

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 improvement or prevention programme is needed.	No factories in the respective risk profile	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.	N/A	6	0

**Comment:** DAWN has no suppliers where improvement or prevention steps are not needed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Advanced	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.	6	6	0

**Comment:** In previous years (before 2022), DAWN's CAP-findings indicated the presence of excessive overtime. However, in 2022, during the two audits conducted, no such findings were reported. Furthermore, the member brand provides its supplier with complete flexibility to fulfil orders even during non-peak periods. To address any gaps in production capacity, DAWN also supplies the factory with "never out of stock" (NOS) items to produce in advance, ensuring a consistent and stable production flow.

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, no audits included findings regarding non-payment of legal minimum wage.

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.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	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.	6	6	0

**Comment:** DAWN and its only supplier share the same owner. DAWN created an overview of the wage levels at its supplier and determined the living wage benchmark following the Anker methodology. The brand discusses the topic of wages with its supplier and their worker representation. Based on the root cause analysis, the member has taken specific steps to increase wages towards a living wage, resulting in a systemic and time-bound approach. The factory pays more than the Legal Minimum Wage (LMW) and meets most of the living wage estimates, including the Wage-indicator benchmark. However, it is less than the Asia floor wage.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Advanced	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.	6	6	0

**Comment:** DAWN uses the Anker living wage methodology to determine employee salaries at its production facility. In addition to the base salary, DAWN offers various structural in-kind benefits, including allowances for food, housing, transportation, child education, unforeseen expenses, and the option to save some of their earnings.

Furthermore, all employees are provided with private health insurance, which can be extended to cover one additional family member. DAWN also conducts training sessions on salary calculation and legal payment practices to ensure transparency and compliance.

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.	100%	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.	6	6	0

**Comment:** In 2022, all production workers earned at least the Anker living wage estimate. The factory pays more than the Legal Minimum Wage (LMW) and meets most of the living wage estimates, including the Wage-indicator benchmark. However, it is less than the Asia floor wage. These figures were verified in a Fair Wear audit.

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 Complaints Procedure.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

**Comment:** DAWN received no complaints in the past financial year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	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:** DAWN has one CAP finding where training is a recommended follow-up action. The member has enrolled its only supplier with findings on improving Social Dialogue in the Fair Wear WEP communication training in August 2022.

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

**Comment:** DAWN has not received training reports yet and awaits those to decide on appropriate follow-up. However, based on the exit meeting, the brand has already started working on some actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring 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:** DAWN's human rights risk monitoring includes a responsible exit strategy. As DAWN and its tier-one supplier share the same owner, the responsible exit strategy only applies to subcontractors and suppliers beyond tier-one. DAWN discusses the exit strategy as part of the annual supplier assessment with its suppliers. When evaluating the suppliers, it is also explained what happens when a supplier's performance is insufficient in such a way that it would lead to exit and how this exit would look.

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:** DAWN does not undertake activities related to human rights that go beyond Fair Wear's scope.

## Layer 4 External communication, outreach, learning, and evaluation

**Possible Points: 22**

**Earned Points: 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 and its human rights due diligence efforts.	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:** DAWN communicates accurately about Fair Wear membership on its website.

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:** DAWN does not sell external brands.

## Indicators related to brand and supply chain transparency

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Social report 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:** DAWN has submitted its social report, which Fair Wear approved. DAWN 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:** DAWN published its social report, which includes factory-level data and remediation results, on its website.

**Recommendation:** Fair Wear recommends DAWN 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.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

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

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Advanced	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.	4	4	-2

**Comment:** In the previous performance check the following requirements were included: 7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management. The member followed up on all requirements.

## 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:** [DAWN's owner participated as a keynote speaker in different panels. The owner joined the panel and talked about sustainability efforts from a sustainable business owner's point of view.](#)

## Recommendations to Fair Wear

DAWN suggests that Fair Wear should foster partnerships at prominent events, provide preferential rates for its members during such shows, and actively participate in panel discussions to boost its visibility. Imagine an event akin to ISPO but focusing on the fashion industry. Additionally, DAWN expresses its desire to initiate pilot programs aimed at addressing gender-related issues within the context of the factory's Freedom of Association (FoA) framework.

# Brand Performance Check details

Date of Brand Performance Check: 30-08-2023

Conducted by: Jason Mandels

Interviews with: Marian von Rappard - Owner

Sandra Gonza - Interim CSR Manager

Benjamin Geourjon - CFO