



Brand Performance Check

DAWN GmbH

Publication date: August 2022

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

About the Brand Performance Check

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

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

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

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

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

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

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

Brand Performance Check Overview

DAWN GmbH

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

Member company information	
Headquarters:	Berlin , Germany
Member since:	2017-12-31
Product types:	Garments, clothing fashion apparel
Production in countries where Fair Wear is active:	Viet Nam
Production in other countries:	
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	100%
Benchmarking score	97
Category	Leader

Summary:

DAWN has shown progress on the advanced results on Fair Wear's performance requirements. The company produces at one factory in Vietnam that was built for DAWN. The company has monitored 100% of its volume. The total benchmarking score of 97, means the brand is again awarded Leader status for its third Brand Performance Check.

This performance check was a self-assessment verified by Fair Wear as part of a pilot.

Corona Addendum:

With a lengthy lockdown in Vietnam, DAWN experienced quite a challenging year in 2021. Additionally, the CSR manager stopped in April 2021, and her responsibilities were divided between the CEO and the CSR manager, or DAWN's own factory.

Another challenge was the cancellation or replanning of orders of other buyers sourcing at DAWN's factory. This would have led to high production pressure during some weeks and not enough work in other weeks. DAWN planned its production around these orders to ensure that its sourcing decisions supported social compliance. The member filled production gaps with Never Out of Stock (NOS) orders and kept to its ordered quantities even when retailers reduced orders.

From mid-July to the end of September, Ho Chi Minh City went into complete lockdown and workers from DAWN's factory had to stay home. Wages had to be reduced during that timeframe, but DAWN ensured they were always above the legal minimum wage and paid on time. Office workers agreed to earn less than usual to ensure production workers could receive a decent salary in August and September. In August, wages were reduced for everyone, but DAWN and its factory decided to pay a bonus from their 2020 results. As a result, some production workers received more than they would usually make in a working month. All employees received an identical salary in September, slightly above the legal minimum wage. Next to that, DAWN ensured that workers received governmental subsidies. By collaborating with Tip Me, DAWN could distribute 7500 euros among all employees equally.

After the brand's CSR manager left in mid-2021, monitoring was mainly done by the factory's own CSR personnel. DAWN could demonstrate follow-up on important issues. Fair Wear welcomes the decision to hire a CSR manager in 2022 to ensure a systematic working process.

Because the member exclusively works with its own factory, DAWN knows the FOB price needed to cover actual production costs. Except for the lockdown period, the member could demonstrate that most workers in its factory received the Anker living wage benchmark.

The member has shown that it responded responsibly to the pandemic, ensuring that workers were safe and cared for. Fair Wear commends DAWN for these exceptional efforts.

Performance Category Overview

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

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

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

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

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

1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	100%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: DAWN has its own production facility in Vietnam. The total production cycle of DAWN is arranged at this factory. In 2021, DAWN used 24% of its production location capacity. DAWN works with three laundry sites as subcontractors.

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

Comment: DAWN solely works with one factory and its laundry partners.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	100%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: Since the start of DAWN, all its products are made at its own production facility.

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

Comment: DAWN's own factory and two laundry subcontractor signed the questionnaire, the new laundry subcontractor still needs to sign it.

Recommendation: DAWN is recommended to request a signed questionnaire from its newly added laundry subcontractor.

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

Comment: DAWN's factory was initially built for DAWN, and the brand and the factory expanded together. Continuous presence ensures working conditions can be adequately monitored and improved. In 2021, DAWN started to work with a new laundry subcontractor. The selection process involved assessing its capabilities regarding quality and environmental management system and human rights due diligence by requesting a recent audit report.

During the COVID-19 pandemic of 2021, DAWN consulted a lot of information relevant to the situation in Vietnam, like the Fair Wear COVID-19 Dossier and the country-specific and regional information. The CSR manager updated the management of DAWN on the latest developments. These weekly online meetings, together with the frequent visits of the local staff and the updated information, gave DAWN the trust and confidence that they could still closely monitor the situation in the factory and the laundry location throughout the pandemic and check that health and safety regulations were upheld.

DAWN made sure that its workers at least received legal minimum wage during the three-month-long lockdown in 2021 (see for more information indicator 1.9). The member established an emergency hotline that workers could call during the lockdown. After the lockdown, there were four days in October that the factory had to operate on a 3-on-site policy, which meant workers needed to stay within the factory after work hours. The factory implemented all health and safety regulations and arranged for testing before and during 3-on-site and before all workers came back to work.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

Comment: Given the strong presence in the factory and the laundry locations, compliance is evaluated continuously. Before becoming a Fair Wear member, DAWN worked with BSCI to assess compliance with labour standards and used the audit report to evaluate. Moreover, the company conducts internal audits at all locations to determine progress.

DAWN did not reduce or cancel any orders due to COVID-19. The other brands sourcing from the factory cancelled or re-planned their production, which led to high pressure on production during some weeks, while there was not enough work in other weeks. DAWN decided to plan its production around these orders to ensure that its sourcing decisions supported social compliance. DAWN filled production gaps with Never Out of Stock (NOS) orders and kept to its ordered quantities even when retailers reduced orders.

Recommendation: Even though DAWN only has one owned supplier, Fair Wear recommends the member to evaluate whether there is progress on the supplier's human rights performance. DAWN could invite its supplier to give input on how DAWN's purchasing practices impact its human rights performance.

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

Comment: Given the supply chain structure of DAWN, the company can analyse its direct impact on working hours. Its production facility has access to complete production planning, and the materials purchasing team is based at the factory in Vietnam. The production and laundry facilities work closely together to align the planning.

The design team in Berlin works with the development team in Vietnam from the beginning of the development phase. This helps both parties to plan the sampling schedule and project the number of styles in the coming season. DAWN now has two to three shipment windows per season to avoid bottlenecks instead of four to five shipments.

DAWN analyses the number of minutes related to the total production capacity. The factory has the freedom to look at the styles and decide when to start production according to their capacity to ensure production lines run efficiently. The member knows that the number of different styles within an order can cause excessive overtime, so the brand reduced seasonal production and focused more on Never Out of Stock and basic items instead.

All orders from DAWN had to be shipped by air instead of sea, to make up for lockdown-related delays. The member paid for this.

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

Comment: In 2021, there was significant overtime before and after the lockdown. The finishing and packing departments worked overtime hours in June in order to ship as many orders as possible before closing the factory (from all buyers, not DAWN in particular). After reopening in October, there was overtime work again, in order to be able to respect legal requirements for COVID-19 on safety and working times, while preparing the factory to run again (cleaning the factory, preparing machines, materials for cutting etc).

DAWN gives the factory the flexibility to produce its orders as it best suits the overall production flow. To avoid peaks, DAWN produced more NOS items on 2021.

Before 2021 already, DAWN changed the bonus scheme to promote efficiency and mitigate excessive overtime. Despite all efforts made to reduce excessive overtime, it remains an issue. The factory management informed DAWN that inefficiency and production mistakes might partly explain the overtime.

Recommendation: The member could use the Fair Working Hours Guide to discuss the root causes of excessive overtime and how to tackle these with its supplier. Fair Wear recommends that DAWN considers a realistic percentage of production efficiency in its production planning.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	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.	4	4	0

Comment: DAWN pays a higher FOB price than many other brands in the same industry. This is because DAWN pays the actual cost of products, including overtime bonuses, for instance. But also because, with relatively small quantities, it costs more time to produce its items as it is less efficient in production.

DAWN has access to all the information of the payrolls of its factory and, therefore, can deduct how the FOB prices relate to the paid wages. The labour cost equals the total employees' salary divided by the total products in a month. DAWN has a clear breakdown of all the input costs and knows the labour costs. However, DAWN and the factory could not calculate the labour minute costs for each style in 2021.

DAWN proposed to the other brands sourcing in the factory to have a very transparent cost breakdown system. While the FOB is a fixed price, many elements during the production and shipping can influence the price, like sudden air freight or an increase in material costs. DAWN proposed the other brands to adjust their pricing to include unexpected cost increases whenever they occur. The other brands appreciated the proposal in theory but decided not to work with it.

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

Comment: In 2021, there were almost three months of full lockdown in Ho Chi Minh City. From mid-July to the end of September, the factory's office staff worked from home, and production workers had to stay home.

Wages had to be reduced during that timeframe but were always above the legal minimum wage and paid on time. In July, workers' wages were reduced by 1,5 million VND, which meant that workers still received wages well above the legal minimum wage. In August and September, office workers agreed to earn less than usual to ensure production workers could receive a decent salary. In August, salaries were reduced for everyone, but DAWN and its factory decided to pay a bonus from their 2020 results. That month meant that some production workers received more than they would usually make in a working month. For office staff, it meant some received less than usual. All employees received an identical salary in September, slightly above the legal minimum wage. During the four days of 3-on-site, the workers who decided to stay home were also paid at least the minimum wage

On top of the wages, with the help of the factory, employees individually received 1,8 million VND as government support in this period.

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

Comment: Since DAWN and the factory are part of the same group, the company has advantageous payment conditions. There are no fixed payment terms, and payments are done randomly to deal with cash flow issues. The group ensures this does not affect the capacity of the factory to pay wages and other fixed and operational costs. It is an overall financial balance that is considered to ensure the company and factory are financially healthy.

Recommendation: Fair Wear recommends DAWN to set clear payment terms so that the factory knows when to expect payment.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	6	6	0

Comment: DAWN follows Anker's methodology to calculate living wages. Due to several issues, it was challenging to follow up closely on this topic in 2021. However, as explained in the next indicators, the member could keep to Anker's living wage benchmark for the region of Ho Chi Minh city of 7,446,294.00 VND per month.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	100%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	2	2	0

Comment: DAWN owns its production facility.

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

Comment: DAWN has taken the Anker living wage methodology as a benchmark for the employees' salaries at its own production facility. On top of the basic salary, structural in-kind benefits are provided such as allowances for food, housing, transportation, child education, unforeseen expenses, plus some savings. All employees receive private health insurance, which is expanded to include one additional family member. DAWN provided training on salary calculation and on legal payment.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	100%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	6	6	0

Comment: In 2021, apart from the lockdown period (see 1.9 for details), most production workers earned at least the Anker living wage estimate. It is possible that a couple of workers worked fewer hours in some months and thus earned a bit less. One helper makes slightly below the Anker benchmark. In both cases, the gap would be a maximum of 5% with the target living wage.

Purchasing Practices

Possible Points: 50

Earned Points: 49

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	100%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.		
Member meets monitoring requirements for tail-end production locations.	N/A	
Requirement(s) for next performance check		
Total monitoring threshold:	100%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

Comment: DAWN works with its own CSR manager, and a CSR manager at its factory. When DAWN's CSR manager left in April, the responsibilities were divided between the factory's CSR manager and DAWN's CEO.

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

Comment: DAWN makes use of BSCI, and Fair Wear audits.

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

Comment: DAWN shared the audit reports and CAP with factory management and worker representatives on time. DAWN carefully followed up on all CAPs and could track the status via CAP comments and evidence documentation. The factory has one month to answer the findings and two months to show evidence of remediated CAP points. The factory shares the outcomes of resolved CAPs to production workers through poster announcements in Vietnamese.

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

Comment: The monitoring strategy of DAWN is focused on prevention. DAWN regularly checks social compliance and nurtures a culture at the factory of speaking when workers have an issue. The CSR personnel located in Vietnam is frequently present on the production floor, as the staff in Germany could not visit the factory until the end of 2021.

The last audit took place in November 2020, conducted by BSCI. The audit found two issues regarding severance payment, which have been swiftly resolved. The audit also noted that breastfeeding women (from the merchandising department) were working full hours (instead of seven per day) and not allocated to an easier job. This has been immediately corrected, and a policy has been created to follow legislation for nursing workers. To make up to the nursing workers, they received back payment of the wages of one hour per working day from January to September. The last serious issue was that the factory did not provide a biannual health check because this was difficult to do during the pandemic. One health check-up took place after reopening in November.

DAWN continued the previously implemented COVID-19 measures. It spread the lunch breaks to avoid having all workers at the same time in the canteen and arranged for testing. Payment of wages during lockdown is described under indicator 1.9.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	100%	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: DAWN's founder and CEO managed to visit the factory after the lockdown; in December 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

Comment: The factory and the laundry subcontractors have been audited by BSCI. DAWN uploaded the audit reports on Fair Wear's internal system, including the quality assessments and follow-up on CAPs.

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

Comment: DAWN does not use abrasive blasting techniques, as verified during its frequent visits to the laundry subcontractors. DAWN has supported one laundry facility to build a chemical warehouse and increased the ratio of the products to be treated with Ozon, e- flow and Laser, to reduce the number of chemicals.

To address restricted freedom of association, DAWN planned to enrol its factory in Fair Wears WEP Communication. Due to the pandemic, this training was postponed to 2022. Earlier, DAWN had invited a renowned training company via trade union CNV International to give training on social dialogue. This company decided not to pilot at this factory, as they noticed that the workers are already quite advanced and do not need such training. DAWN's CEO met with the union representatives to discuss learnings during the pandemic. When the factory reopened after lockdown, DAWN organised a training for all workers on social policies and the grievance mechanism.

In 2021 DAWN continued the implementation of extra OHS measures. Follow-up during the pandemic is described under indicator 1.9.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

Comment: No other members source from the same supplier. DAWN has regular contact with the other brands sourcing from the same factory, as the Board of Directors of DAWN is also the Board of Directors of the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	No production in low-risk countries	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	N/A	2	0

Member undertakes additional activities to monitor suppliers.: N/A (N/A)

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

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

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

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

Monitoring and Remediation

Possible Points: 25

Earned Points: 25

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	0	

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

Comment: DAWN has appointed two colleagues in the CSR team to take responsibility for handling complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: DAWN has posted the Worker Information Sheet at its factory and the washing facilities. The CSR team in Vietnam regularly checks the factory and laundry locations to see if the grievance and complaint system is known among workers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	100%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: Each year, DAWN organises factory training on social policies, including awareness training of the Fair Wear Code of Labour Practices and grievance mechanism. In 2021 this was done after reopening in November.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

Complaints Handling

Possible Points: 9

Earned Points: 9

Additional comments on Complaints Handling :

DAWN and the factory are constantly looking for the right balance between inserting a culture that is democratic and, at the same time, respecting the local culture. DAWN manages to create an atmosphere in the factory where the workers feel confident to speak up. Part of the onboarding training is creating awareness of this open culture, although it seems that the middle management is struggling with becoming familiar with it.

DAWN invests in different training for the workers to grow within the factory. Some workers who started on the work floor now have a role in middle management. They also receive training to learn English to communicate with DAWN management.

4. Training and Capacity Building

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

Comment: Both staff in Germany and Vietnam received numerous training and presentations about the membership of Fair Wear.

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

Comment: The product development and finance team have been trained about Fair Wear requirements in 2020. Since DAWN works with its own factory, Fair Wear requirements are directly integrated into its sourcing strategy. Staff in Berlin received less training due to the pandemic and staff changes. DAWN sees opportunities to expand training in Germany to actively integrate Fair Wear in sales pitches.

Recommendation: Fair Wear recommends DAWN to provide regular on-site meetings and training for the staff in Berlin and the employees working in the shops.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	N/A	2	0

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

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

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

Training and Capacity Building

Possible Points: 3

Earned Points: 3

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

Comment: As DAWN's supply chain consists of one Cut Make Trim location owned by DAWN and three laundry subcontractors with which DAWN directly communicates, there is no risk of production locations that are unknown or not monitored by DAWN. Embroidery, buttoning and packaging all take place at its own factory.

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

Comment: DAWN works with an online system that can be accessed by both staff from Germany and staff in Vietnam. All folders are structured and shared in Sharepoint, with a good chat function. This made it really easy to connect the German staff with the Vietnamese staff.

A lot of processes are done by the factory's staff in Vietnam, Germany DAWN only has a small team of seven people. The CSR manager at the factory is in charge of all social compliance monitoring and decisions. Audit reports and results are shared with top management of the factory and DAWN.

Information Management

Possible Points: 7

Earned Points: 7

6. Transparency

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

Comment: DAWN meets Fair Wear's communication requirements. DAWN acknowledges that it did not put much effort into educating the people working in the multibrand stores, and sees advantages to onboard them on the Fair Wear membership.

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

Comment: DAWN publishes its Brand Performance Check report, BSCI audit reports and other certifications on its website through the retraced badges, available on the webshop for each product. DAWN has disclosed production locations. 100% of production volume is disclosed to other members in the internal database and on the Fair Wear website.

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

Comment: The social report has been submitted, approved by Fair Wear and published on the member's site.

Transparency

Possible Points: 6

Earned Points: 6

Additional comments on Transparency :

DAWN works with retraced to show as much information as possible about its supply chain and suppliers to the end consumers. It allows consumers to track the traceability of materials and production information by scanning a QR code, directly on their purchased product label.

DAWN's supply chain information, including Brand Performance Check, BSCI audits, etc. which are mapped through retraced, are available on the website as well.

7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	No	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	0	2	0

Comment: With the turmoil of the pandemic in 2021, there has not been an evaluation with top management and Dawn's factory about Fair Wear membership.

Requirement: DAWN GmbH should conduct an annual evaluation involving top management that ensures Fair Wear policies are integrated into the structure of the company. Evaluation should include input from relevant external stakeholders and feedback from suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Evaluation

Possible Points: 2

Earned Points: 0

Recommendations to Fair Wear

DAWN did not have any recommendations for Fair Wear.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	49	50
Monitoring and Remediation	25	25
Complaints Handling	9	9
Training and Capacity Building	3	3
Information Management	7	7
Transparency	6	6
Evaluation	0	2
Totals:	99	102

Benchmarking Score (earned points divided by possible points)

97

Performance Benchmarking Category

Leader

Brand Performance Check details

Date of Brand Performance Check:

05-07-2022

Conducted by:

Self Assessment verified by Niki Janssen

Interviews with:

Florence Bacin - CSR manager