



BRAND PERFORMANCE CHECK

DAWN GmbH

PUBLICATION DATE: OCTOBER 2019

this report covers the evaluation period 01-04-2018 to 31-03-2019

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation 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. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF'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 FWF 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 FWF 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 FWF'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.

BRAND PERFORMANCE CHECK OVERVIEW

DAWN GmbH

Evaluation Period: 01-04-2018 to 31-03-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Koln, Germany
Member since:	01-01-2018
Product types:	Fashion
Production in countries where FWF is active:	Viet Nam
Production in other countries:	Not Applicable
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	100
Category	Leader

Summary:

DAWN has shown advanced results on performance indicators. The company's production is in one place; a factory in Vietnam that was built for DAWN. A small percentage of the production is washed at a laundry subcontractor. This unique supply chain structure has enabled DAWN to test and analyse improvements that have a direct impact on the workforce. It has given the company high leverage and stable, personal relationships to invest in good labour standards. By working on improvements from an external audit as well as its own internal audits at the production location, the company has monitored 100% of its 2018/2019 volume. This, together with a benchmarking score of 100 has resulted in Leader status, even though this is the company's first performance check.

By having direct contact with its employees, DAWN shows a strong commitment to creating a satisfying working environment. This includes an empowerment training programme, well-being and development benefits and wages that meet a living wage estimate based on the Anker methodology, including private health insurance. DAWN has investigated the root causes of overtime and has implemented several strategies to mitigate the risks of excessive overtime.

Fair Wear encourages DAWN to continue analysing production planning in relation to reasonable working hours and the wage levels in relation to inflation and rising living costs. In this context it would be particularly relevant to include the other clients of the Vietnamese production facility in the discussion. In order to further support meaningful and effective dialogue structures, Fair Wear suggests that the Vietnam production facility takes part in the communication module of Fair Wear's Workplace Education Programme.

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 FWF's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF 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.	94%	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 their own production facility in Vietnam where the majority of its production capacity is for DAWN. The open capacity (between 20-30% is filled with other brands. The factory works with a laundry subcontractor where DAWN's products are washed. High leverage does not only come from owning their own factory but from arranging the entire production at the factory itself, including monitoring working conditions, production planning and capacity building. DAWN invested heavily in the laundry site, hired the line manager and has the washing technician present.

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%	FWF 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 FWF.	4	4	0

Comment: All of DAWN's production comes from their own factory and the laundry subcontractor.

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 existence of DAWN the products are made at their 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.	Yes	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.	2	2	0

Comment: Both the factory owned by DAWN, as well as the laundry subcontractor have signed the questionnaire with Code of Labour Practices.

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: To DAWN, owning their 1st tier production location was part of the vision that this is the only way to produce ethically. To have a close personal relation with all personnel and to have a real impact. The factory was built for DAWN and expanded together. Continuous presence ensures working conditions can be adequately monitored and improved.

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: Formally, DAWN holds a once a year evaluation with the team to track progress. However, given the strong presence in the factory, compliance is evaluated systematically. 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 the factory to evaluate progress.

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. Their production facility has access to the complete production planning and the purchasing team is based at the factory in Vietnam. By introducing a new Enterprise Resource Planning (ERP) system, the purchasing and order placement happens in Vietnam. Together with the design and sales team it is decided how to split orders over different windows. DAWN analyses the number of minutes in relation 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 and to ensure production lines are running efficiently. DAWN aimed to reduce bottle necks by moving from 2 shipment windows to 4, however this did not have the intended effect on balancing out working hours. After analysing the root causes of overtime, DAWN learned that the cause of overtime is not the delivery date itself but rather the amount of complex styles in a single window. To mitigate this, DAWN based the style selections in a window on dialogue between production, planning and sales teams instead of it being sales and design driven.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Advanced 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.	6	6	0

Comment: DAWN accepts the first shipment window cannot be shipped by sea, as the order placement does not provide sufficient lead time. Despite this, DAWN occasionally faces overtime issues in the sampling and development room. In an attempt to reduce this, the core collection of materials is always on stock to avoid delays and to ensure production can get ahead when it comes in. DAWN also has been able to fill up the non-peak with the order planning of other brands.

In case fabric is late, DAWN will push the delivery date. Moreover, after realising the customer packaging resulted in a major bottle neck, it has changed its packaging to mitigate the pressure and risk of overtime in the packaging department.

Recommendation: It is recommended to continue analysing root causes and bottle necks to reduce excessive overtime and optimise the calendar to better manage internal capacity. A suggestion is to engage and consult workers to find effective solutions. Collaboration with the other clients of the factory is necessary to mitigate overtime in the sampling department; this will be a particular risk in case the other clients' planning changes.

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 is able to pay the true cost of the product. The unit price is different based on the different product styles and number of minutes. The labour cost is equal to the total employees' salary divided by total products in a month.

This cost includes all the benefits the factory provides for its workers as well as costs arising out of unforeseen or incidental circumstances on the production floor. For other clients in the factory, the FOB price is initially calculated using the previous season's experience and subsequently reviewed by the factory and brand management on a quarterly basis.

Recommendation: Fair Wear recommends DAWN and its Vietnam production facility to get familiar with the labour costing tool to analyse all cost break downs of all product groups in order to support their negotiations with other buyers.

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, FWF 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, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

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

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 has analysed the living costs in the region by literally testing out food and housing costs in the area. Together with a survey in the production location, the company was able to analyse and compare the findings with the information from the Anker living wage estimate. Moreover, DAWN looks at one of the root causes of low wages; the inability of workers to secure long term social security insurances. The company therefore invests largely in training and education for workers to improve their skills and provide health insurance coverage for workers plus one family member.

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).	94%	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: The production facility in Vietnam is owned by DAWN.

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.	4	4	0

Comment: DAWN has taken the Anker living wage methodology as a benchmark for the employees' salaries at their 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 as a standard, which is expanded to include one additional family member. The future strategy, as the company grows, is to provide training on efficiency to develop workers' skills and therefore wages. This is not to improve production but to increase workers' salary.

Recommendation: To encourage DAWN to expand beyond tier 1, Fair Wear suggests to investigate wage levels at the laundry location. Moreover, Fair Wear can support in analysing how productivity increases can lead to sustainable improved wages by using the labour costing methodology.

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	94%	FWF 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.	3	3	0

Comment: Wages in the Vietnam factory meet the Anker living wage estimate which is part of the employee benefit programme. Wages paid are approximately 42% above the BSCI Living Wage Survey, 21% above the Government Trade Union calculation and 81% above the legal minimum wage.

Recommendation: Fair Wear encourages DAWN to continue implementing the Anker methodology. However, given that the benchmark has not yet been updated, it is suggested to analyse wage levels in comparison with inflation rates and recent rise in living costs.

PURCHASING PRACTICES

Possible Points: 49

Earned Points: 49

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	100%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	N/A	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	N/A	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check	N/A	
Total of own production under monitoring	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 FWF 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: Both DAWN as well as the Vietnamese counterpart are responsible for monitoring and improving working conditions.

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 FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No Corrective Action Plans were active during the previous year	2 part indicator: FWF 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.	N/A	2	-1

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.	No Caps Active	FWF 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.	N/A	8	-2

Comment: During this performance check the outcomes and follow up of the BSCI audit were evaluated (see 2.6). An audit by the Fair Wear team took place in May 2019, which is out of the scope of this performance check and will be assessed in next performance check.

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%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: DAWN staff is permanently present in the production location. The washing subcontractor is visited often by the washing technician, co-founder and designer.

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 Vietnam factory as well as the washing subcontractor was audited by BSCI in January 2019. DAWN and the Vietnam factory followed up on the two improvement areas. In addition, the CSR officer of the Vietnam factory regularly conducts her own audits. The most important finding from the BSCI audit related to production planning and working hours. Changes were implemented to reduce overtime hours (see indicator 1.6 and 1.7). Moreover, DAWN implemented several improvements last year:

- Separation of cutting area from sewing area and added ventilation system to reduce the fabric dust.
- Investment in new overlock machine which can vacuum the fabric and reduces dust.
- Air-conditioned sewing floor
- massage/acupuncture services to employees
- systematic implementation of Anker benchmark
- tested strategies to improve social dialogue (see chapter 4)

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 FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	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 in their denim. As they are present during production both at the factory and washing subcontractor, they can verify this. DAWN has supported the laundry facility to build a chemical warehouse, banned acid wash from their collections and pushed for a BSCI audit. DAWN is aware of the health risks in treating denim and most of the washes are treated with Ozon, e-flow and Laser to reduce the amount of chemicals.

In terms of risks accompanying production in Vietnam, DAWN has actively tested strategies to engage workers in dialogue (such as satisfaction surveys, a voice room where workers can express grievances or provide feedback). The development of the new payment structure included an analysis of the social impact on employees.

Recommendation: Fair Wear advises to implement similar structures for improving and monitoring working conditions at the washing subcontractor. DAWN can use Fair Wear monitoring tools such as the Health and Safety guides.

DAWN can support independent worker engagement through the regular dialogue meetings and investigate how they can contribute to implementing the action plan workers and management have agreed on. DAWN can improve the internal training on grievance mechanisms and complaints handling.

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

Recommendation: There are no other Fair Wear members producing at the Vietnam production facility. However, it is encouraged to include the other clients in the process of improving working conditions, particularly during the improvement process of production planning and working hours.

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. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	N/A	3	0

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	FWF 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 FWF 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	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF 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	FWF 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 FWF's information management system. Documentation of sales volumes of products made by FWF 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	FWF 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: 15

Earned Points: 15

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 FWF 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: Both DAWN as well as the Vietnamese compliance officer are responsible 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 FWF 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 the Cut Make Trim and washing location in Vietnam.

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.	94%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: DAWN has organised factory training on company grievance system, labour regulations and the Fair Wear Code of Labour Practices.

Recommendation: It is recommended to organise a meeting/training to inform workers of the exact operation of the hotline, including the possibility that it can be used for information inquiries and to verify/cross check information given by factory.

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 FWF 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

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 FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

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 FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

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, FWF 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.	94%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: DAWN has an employee education programme that includes training on grievance mechanisms and labour regulations. Plans are created at the end of each year for the following 12 months and incorporate a mix of internal and external training. It covers issues such as labour safety and hygiene, fire drills & fire fighting and basic first aid. Moreover, there is training for office staff and management on issues including sustainable supply chain, social audits and topics related to the FWF CoLP and Amfori BSCI code of conduct. DAWN has implemented several actions to improve worker engagement, however the company feels it has not yet resulted in meaningful social dialogue. Awareness of what a union representative is and can mean for the workforce is low.

Recommendation: In order to further support meaningful and effective dialogue structures, Fair Wear suggests the Vietnam production facility to take part in the communication module of Fair Wear's Workplace Education Programme. It can be made specific to the production location to ensure effective and independent worker representation. Issues such as voting on the company's bonus structure can be used as an example for creating real input of workers' perspective.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	Active follow-up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	2	2	0

Comment: Given the set up of their own factory, training and programmes are reviewed on the impact it has. The internal training happen regularly and can be considered internal assessments.

Recommendation: It is suggested to review the training programme with Fair Wear in order to add to the quality of the training and share material that can be used, including the Fair Wear complaints hotline.

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 11

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 for product assembly consists of one Cut Make Trim location that is owned by DAWN and one laundry subcontractor with direct communication, there is no risk of production locations that are unknown or not monitored by DAWN. Embroidery, buttoning and packaging all take place at their 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: The owners of DAWN, the designer, production and sales staff are all either located at the factory in Vietnam or work closely together from the office in Germany. Information is shared on a regular basis.

Recommendation: It is advised to have a centralised place where all information regarding working conditions and Fair Wear membership is stored, accessible to all staff, both in Germany and Vietnam. Even though it may sound bureaucratic since there is permanent staff available in Vietnam, it will support streamlining decision making between the German and Vietnam office in terms of policy and Fair Wear membership.

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	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: DAWN meets Fair Wear's communication requirements. DAWN has produced a video explaining its ambitions and values with regards to working conditions. It organises meetings and events for sales staff/retailers to ensure they are of DAWN's commitments in terms of sustainability and FWF membership. DAWN is in process of consolidating to partners that understand the concept of sustainability.

Recommendation: Fair Wear can provide material to support raising awareness among sales staff and retailers on 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 FWF'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: With transparency being one of the company's key values, DAWN makes the entire supply chain transparent. With support of third party 'Respect Code' every product is traceable from the source of raw materials to factories' identification and transport. It includes outcomes from audits and certificates and shows social and environmental indicators associated to different products.

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 FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

Comment: The social report is submitted and published on the website.

TRANSPARENCY

Possible Points: 6

Earned Points: 6

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Fair Wear membership is evaluated with supplier feedback directly integrated.

Recommendation: Fair Wear advises to organise an evaluation meeting with management and sourcing staff to discuss the outcomes of this performance check and use those to formulate future plans.

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, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF 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: 2

RECOMMENDATIONS TO FWF

DAWN would appreciate more collaboration with Fair Wear on consumer outreach programmes during Black Friday, as well as sustainable fashion shows and fairs. Moreover, DAWN suggests Fair Wear to facilitate brands committing to a jointly agreed living wage methodology. From DAWN's experience, covering health insurance is one good and feasible step in ensuring sustainable wage increases. DAWN is willing to do a pilot project and explain the costs, benefits of such structural in-kind benefit programs to collaborate with other members.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	49	49
Monitoring and Remediation	15	15
Complaints Handling	9	9
Training and Capacity Building	11	11
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	99	99

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

100

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

04-10-2019

Conducted by:

Annabel Meurs

Interviews with:

Marian von Rapperd - Owner

Rachel Chuang - Sustainability manager DAWN

Doan Thuy Oanh Vo - CSR Manager Evolution