



Brand Performance Check

DAWN GmbH

This report covers the evaluation period 01-04-2019 to 31-12-2020

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 years' 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 outbreak of 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: 01-04-2019 to 31-12-2020

Member company information	
Headquarters:	Berlin , Germany
Member since:	2018-01-01
Product types:	Fashion
Production in countries where Fair Wear is active:	Vietnam
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 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. This, together with again a benchmarking score of 100, has resulted in Leader status for its second Brand Performance Check.

Corona Addendum:

DAWN needed to adapt its strategy to be more flexible for B2B in Europe. The brand was flexible on payment terms as the factory owner towards the other brands sourcing from the factory and towards the retailers. In 2019 E-commerce was only a small percentage of the overall sales. In 2020 DAWN increased its e-commerce heavily.

DAWN's management, who is also the management of the factory, has voluntarily asked to reduce their salary for some months to ensure the workers' salary. They regained their salary at the end of the year, and DAWN managed to compensate for the reduction. DAWN did not reduce its orders and re-planned based on the capacity of the factory. DAWN started 2020 as a strong and healthy brand. This made DAWN being well prepared to absorb the crisis.

During COVID-19, DAWN was in constant contact with the management and workers at the factory to try and mitigate the pandemic's negative influences as much as possible. As the owner of the factory, DAWN perceives the employees at the factory as its own colleagues.

As DAWN owns the factory, it was easier to adjust its production planning without negatively impacting the conditions for the workers. The pressure of the other brands sourcing in the factory caused stress, as they cancelled and re-planned orders. DAWN managed to work around their production demands and made sure DAWN's production did not influence the working hours.

DAWN has local teams who could still monitor the factories throughout the year. DAWN set up weekly online meetings to keep each other informed and update the staff on the latest information available in the Fair Wear COVID-19-dossier and other relevant sources.

DAWN implemented special measures to avoid spreading COVID-19, like placing plastic dividers between the workstations, not allowing external visitors to the factory and spreading the lunchbreaks. These measures paid off as there was no mass spread in the factory, and the factory did not need to close its doors or deal with other operation restrictions.

The advantage of owning its own factory is even more convincing to DAWN after the COVID-19 outbreak. Although it was a challenging year of which DAWN hopes never to experience again, DAWN could adjust its production planning and release pressure off the workers because it owns the factory. DAWN looks back at a hectic year but is content that the factory and the laundry location are still in business and producing sustainably, and the brand maintained its customer base.

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.	95%	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. The majority of the production capacity of the factory is for DAWN. 30% of the capacity is filled with other brands. DAWN works with a laundry site as a subcontractor. DAWN is very close with the laundry site and treats it as its own supplier.

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 partner.

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 and the laundry site.

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 signed the questionnaire. DAWN is in contact with a potential new laundry subcontractor, as the current laundry partner might want to close. The conversations with this new subcontractor are in an early stage. DAWN already informed the potential new laundry subcontractor about the Fair Wear 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. The factory was built for DAWN and the brand and the factory expanded together. Continuous presence ensures working conditions can be adequately monitored and improved.

During the COVID-19 pandemic of 2020, DAWN could still mainly proceed following its regular system. DAWN staff located in Vietnam could still visit the factory and the laundry location frequently. They had to inform the factory management about their visit in advance, while normally they can always enter the factory without notice. This did not cause any difficulties.

DAWN organised a BSCI audit for both locations. DAWN reduced the frequency of internal audits at the laundry location because of visitors restrictions due to COVID-19. DAWN started holding weekly online meetings with the management of the factory to discuss the latest situation and potential risks and ways to mitigate those risks. DAWN collected questionnaires about the COVID-19 situation from both the factory and the laundry location. DAWN identified OHS issues due to COVID-19 and acted accordingly (see indicator 2.4). DAWN monitored the payment of wages closely, to see if the pandemic influenced the payments.

DAWN consulted a lot of information relevant to the situation in Vietnam, like the Fair Wear COVID-19 Dossier, the country-specific information and regional information. The CSR manager updated the management of DAWN on the latest developments, although the CEO was also on top of the latest developments as he is also the CEO of the factory.

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.

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 location, 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 both locations to evaluate 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 in other weeks there was not enough work. DAWN decided to plan its production around these orders, to ensure that its sourcing decisions support social compliance.

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 complete production planning and the purchasing team is based at the factory in Vietnam. The production facility and the laundry facility work closely together, to align the planning. 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 learned that the number of complete styles within an order can cause excessive overtime. Therefore the style selections is based on a window of dialogue between production, planning and sale teams instead of being sales and design-driven. 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.

In collaboration with the workers, DAWN invested in new machinery and equipment to increase efficiency. DAWN slowly moves away from seasonal production lines and instead want shifts towards NOS and basic production to increase production and operational efficiencies. DAWN now has two to three shipment windows to avoid bottlenecks, instead of four to five shipment windows.

COVID-19 required a lot of flexibility on planning since the other brands sourcing from the factory cancelled or re-planned their orders. DAWN held weekly meetings between the production & factory merchandise team to understand potential bottlenecks in the production process. DAWN gave the factory the authority of the production and shipment planning. DAWN managed to be so flexible that its production could be planned around the production of the other brands and didn't cause excessive overtime.

During the pandemic, it was particularly difficult to plan orders for the sampling room. At times there was no work at all for sampling, other times it was too busy. Therefore DAWN decided to plan their sampling around the sampling of the other buyers. The factory had the authority of the planning of DAWN in consultation with DAWN.

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: The factory had the authority to plan production and shipment. DAWN has a flexible delivery window, to give the factory more space to produce.

The factory management system includes a request & follow up procedure so HR and the production team can check the balance of working hours to prevent overtime issues. Any overtime needs to be signed off by the Board of Directors. If the Board of Directors notices overtime issues due to production planning, they discuss it during the weekly meetings. The Board of Directors can balance out the hours by rescheduling the production. DAWN changed the bonus scheme to promote efficiency and mitigate excessive overtime. Despite all efforts made on reducing excessive overtime, it remains an issue.

In 2020 the Vietnamese government changed labour legislation to make more overtime possible. However, DAWN still assesses overtime as an issue in the factories and mitigates the incentives to work overtime by paying living wages (see 1.13). Nevertheless, DAWN notices that workers are still willing to work overtime, to receive more salary. DAWN hired a consultant to improve the agility and flexibility, to mitigate excessive overtime.

To avoid peaks, DAWN produced more Never Out of Stock-items (NOS-items). This helps to smoothen out production throughout the year and enables the factory to book their material even more in advance. The management can plan according to available capacity.

Recommendation: Although DAWN already focuses on mitigating the risk of overtime, workers are still inclined to work overtime. Once root causes of excessive overtime are known, DAWN can use the Fair Wear guidance on addressing excessive overtime and check what solutions, processes and tools are linked to a particular root cause.

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. DAWN has access to all the information of the payrolls and knows the exact link between the prices and the wages. The unit price is based on product styles and the number of minutes. The labour cost is equal to the total employees' salary divided by total products in a month. 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. DAWN has a clear breakdown of the costs.

DAWN proposed to the other brands sourcing in the factory to have a very transparent system of cost breakdown. 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 or decrease in material costs. DAWN proposed the other brands to adjust their pricing to include unexpected costs 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: During the pandemic, factory management approached DAWN with the proposal to lower their salaries and not touch the salaries of the workers. At the end of the year, DAWN managed to compensate for this reduction. The workers at the laundry location were also paid consistently throughout the year.

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: DAWN's management also manages the cash flow for the factory. It was a tough job for the CFO of DAWN, who is also the CFO of the factory, to manage the cash flow. DAWN had to pay for the material of the other brands sourcing in the factory, to make sure production could continue. DAWN paid on time.

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: In 2019 DAWN conducted a survey into the living costs for the workers in both factories. In 2020 the member could not conduct this survey due to the pandemic. Instead, it increased the salaries of workers in both factories by 2.5% while inflation was 2.3%.

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).	95%	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 the 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 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. DAWN provided training on salary calculation and on legal payment. This is not to improve production but to increase workers' salary.

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.	95%	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: Wages in the factory meet the Anker living wage estimate which is part of the employee benefits programme. Wages paid are approximately 42% above the BSCI Living Wage Survey, 32% above the Government Trade Union calculation and 81% above the legal minimum wage. As mentioned under 1.11, in 2020 DAWN increased the wages by 2.5% to adjust for inflation which was 2.3%.

Purchasing Practices

Possible Points: 52

Earned Points: 54

Additional comments on Purchasing Practices :

DAWN did research to go down the supply chain. DAWN's mission was to shake hands with the cotton farmer. DAWN collaborated with Cotton Connect to trace the cotton supply chain. DAWN was able to get to tier four but had no leverage in getting further information from them. Cotton is often just a small percentage of the overall products of these traders. It is seemingly impossible to trace from which cotton farm the cotton came from, that ends up in DAWN clothes.

DAWN collaborates with Tip Me. This project was initiated due to the pandemic. Tip Me enables consumers to directly tip the workers. DAWN conducted research to make sure all tips were 100% generated for the workers. The implementation of Tip Me allowed an extra tip for the workers of over 7.000 euros.

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.	0%	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.)
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: Both DAWN and the factory are responsible for monitoring and improving working conditions. Two CSR colleagues are specifically designated to follow up on problems.

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's with factory management and worker representation on time. DAWN carefully followed up on all CAP's, the status could be tracked via CAP comments and evidence documentation.

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 checks regularly on social compliance and nurtures a culture at the factory of speaking and when workers found an issue.

The CSR personnel located in Vietnam frequently visited the factory on-site, as the staff in Germany could not visit the factory in 2020. The local team conducted an internal audit, as they do each year. Based on this audit, a corrective action plan is developed. DAWN tracked the progress on the CAPs and followed up with management and worker representatives during the weekly meetings set up in 2020 (see 1.4). DAWN conducted an audit in both locations in 2020.

The laundry location conducted an audit in 2019 and in 2020. For both audits, there were no CAPs as there were no issues that needed follow up.

DAWN followed up on different CAP's in the main factory. In response to the issue of awareness of collective labour agreement, for example, DAWN had invited a renowned training company via 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 anymore. DAWN also planned to invite a union leader to address the issues on Freedom of Association, but it was not possible to plan in 2020 due to COVID-19. The workers raised an issue about bad chairs. DAWN set up a CAP for this and developed an ergonomic chair itself to meet the needs of the workers. In the end, the workers did not use these chairs as it was not comfortable.

DAWN implemented measures in response to COVID-19 in both factories, in consultation with the factories. DAWN spread the lunch breaks to avoid having all workers at the same time in the canteen. The factory added plastic dividers on the work floor. DAWN adjusted its planning to avoid the risk of excessive overtime in both locations (see 1.5). As there were no issues found in the payment of wages, follow up was not needed.

The local team of DAWN also visits regularly visits the laundry and could evaluate compliance during these visits as well.

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: As travel was restricted due to the Covid-19 pandemic, this indicator is not applicable in 2020 for all Fair Wear members.

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: Both locations, the factory as well as the laundry subcontractor, have been audited by BSCI. Both audits are uploaded on Fairforce, including the quality assessments and follow up on CAPs.

BSCI changes its checklists and requirements online, without notifying the brand. This makes it difficult for DAWN to keep track of the changes. Nevertheless, they are updated on the latest changes.

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, verified during its frequent visits of the laundry subcontractor. DAWN has supported the laundry facility to build a chemical warehouse and DAWN increased the ratio of the products to be treated with Ozon, e- flow and Laser, to reduce the number of chemicals.

DAWN has read all relevant documentation of Fair Wear's COVID-dossier and other documentation. DAWN implemented extra OHS measures, based on the information from Fair Wear guidances. These measures included developing more safety protocols, more shifts to avoid working in big groups, and placing plastic dividers between the workstations to avoid the spread of infections.

When travel was restricted, DAWN helped workers to visit their families. In 2020 the acupuncture and massage facilities had to pause, due to COVID-19. DAWN also needed to adjust lunch facilities and divided the groups of workers during lunch to enter the canteen.

DAWN organised an audit at the laundry location in 2019 and in 2020. There were no issues to follow up on based on these audits. The local CSR manager frequently visited this location to also carry out in-person audits throughout the year. DAWN also implemented the same OHS measures.

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 the 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 the Cut Make Trim and washing location in Vietnam. The CSR team in Vietnam regularly checks in the factory and laundry location if the grievance and complaint system is known among the 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.	95%	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: DAWN has organised factory training on social policies, including awareness training of the Fair Wear Code of Labour Practices and the grievance mechanism.

Recommendation: Fair Wear recommends expanding organising the training for the workers at the laundry subcontractor.

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 respects 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. DAWN sees that especially middle management is struggling with becoming familiar with this culture. 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 be able 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 the Vietnamese colleagues receive multiple 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: DAWN provided special training to the Product development team and the finance team about Fair Wear requirements. The office staff of the factory are also trained on Fair Wear information.

Due to the pandemic, staff in Berlin received less training this year due to the pandemic and personal changes. DAWN sees opportunities to expand training facilities in Germany to actively integrate Fair Wear in sales and 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.	48%	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.	4	6	0

Comment: DAWN organised different training programs for the workers, despite the restrictions for visitors to enter the factory. The training on health and safety falls in between awareness-raising and transformative training aimed at tackling structural issues. For this reason, Fair Wear has counted this training towards this indicator for half of its FOB (48%).

The intended advanced WEP training for 2020 was postponed to 2021.

Recommendation: Fair Wear recommends DAWN to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. To this end, DAWN can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

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: 9

Earned Points: 7

Additional comments on Training and Capacity Building :

DAWN also provided its own training on fire fighting and fire drill, social policies training (on BSCI, Fair Wear CoLP and grievance mechanism) and training on salary and legal payment.

Normally DAWN provides an outing, which was not possible in 2020. Alternatively, DAWN invested in a team training called Life Management Program (from PACE), organised by a famous trainer. Workers were involved in the decision to organise this training. This training was highly appreciated and the workers felt acknowledged. Some mid-management received a more tailor-made training as a follow up on previous training. DAWN and the factory offered vouchers for English courses for all staff and their families. The usage rate was low and feedback from the team varied. DAWN hence stopped providing the vouchers and shifted the budget to training on professional growth.

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 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.

Although it was a pity that DAWN staff in Germany couldn't visit the factory, the restriction of only meeting online turned out to be an advantage as well. Instead of heavy quarterly meetings, the staff held weekly meetings to discuss progress, issues and developments. With the ENP-system and Sharepoint as an active channel between Germany and Vietnam, it felt more like one team.

A lot of processes are done by the staff in Vietnam, Germany DAWN only has a small team of eight people.

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 was present at the Neonyt fashion show in Berlin for the first time in January where it presented what it entails to be a Fair Wear member.

DAWN acknowledges that it did not put a lot of effort into educating the people working in the multibrand stores. DAWN sees advantages to also onboard them on the Fair Wear membership.

Recommendation: Fair Wear recommends informing people working in the multibrand stores 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 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 has disclosed production locations. 100% of production volume is disclosed to other members in Fair Force 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

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 Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: DAWN set up weekly online meetings, including the management team, which were also used to evaluate.

Recommendation: Fair Wear advises DAWN to organise a specific meeting with management and sourcing staff to discuss the outcomes of this performance check, the membership of Fair Wear 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, 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: 2

Recommendations to Fair Wear

DAWN recommends Fair Wear to organise a fair with other Fair Wear members accessible for consumers. It is important to build awareness of the work Fair Wear and its members do. It would be interesting to connect all communities and to support each other in outreach.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	54	52
Monitoring and Remediation	25	25
Complaints Handling	9	9
Training and Capacity Building	7	9
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	110	110

Benchmarking Score (earned points divided by possible points)

100

Performance Benchmarking Category

Leader

Brand Performance Check details

Date of Brand Performance Check:

28-05-2021

Conducted by:

Femke Blickman

Interviews with:

Rachel Chuang - CSR Manager

Marian von Rappard - Founder