Brand Performance Check

DAWN GmbH

This report covers the evaluation period 01-01-2024 to 31-12-2024

About the Brand Performance Check

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

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

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

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

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

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

Scoring overview

Total score: 172
Possible score: 186
Benchmarking Score: 92
Performance Benchmarking Category: Leader



Foundational system's criteria	Sourcing strategy	Identifying continuous human rights risks	Responsible purchasing practices	Quality and coherence of prevention and remediation system	Improvement and prevention	Communication, transparency and evaluation
100%	91%	93%	85%	80%	104%	91%

Summary:

DAWN has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 92, the member is placed in Leader category.

DAWN operates under a unique business model, producing all garments at its own factory in Vietnam, which is owned by the same owner. This setup gives DAWN full visibility and control over production processes and working conditions. The sourcing strategy emphasises consolidation and long-term relationships, with formal contracts now in place to reinforce this commitment.

The brand has a well-developed system for identifying and monitoring human rights risks in its supply chain. However, because country-level and factory-level assessments are combined, there is no distinct evaluation of risk impact at the scoping level. Nonetheless, the brand still captures relevant risk factors, including country, product, and business model risks. The analysis also integrates a comprehensive gender lens, identifying gender-specific impacts across all eight Fair Wear labour standards. The brand also integrates stakeholder feedback into its assessments.
For prioritised risks, DAWN has developed an action plan, though there is room for improvement in aligning this more clearly with its Corrective Action Plan (CAP) follow-up. Despite this, the brand has shown strong implementation: 7 out of 10 findings were validated as resolved during the 2023 Fair Wear assessment

DAWN closely monitors working hours and wage data to ensure compliance with labour standards. No excessive overtime was found, and all production workers were confirmed to earn wages that meet most living wage benchmarks, including the Wage Indicator.

Performance Category Overview

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

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

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

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

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

Company Profile DAWN GmbH

Member company information

Member since: 1 Jan 2018
Product types: Garments, clothing, fashion apparel
Percentage of turnover of external brands resold 0%
Member of other MSI's/Organisations Peta
Number of grievances received last financial year 0

Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes
Projected production location data have been submitted for the current financial year? Yes
Membership fee has been paid? Yes

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

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

Layer 1 Foundational system's criteria

Possible Points: 8
Earned Points: 8

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

Comment: DAWN has a solid Human Rights Due Diligence policy in place.

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: Yes

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including grievance handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

Comment: DAWN discloses 100% of production locations internally through Fair Wear's information management system.

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

Comment: DAWN discloses 100% of production locations externally on Fair Wear's transparency portal.

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

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

Possible Points: 78
Earned Points: 70

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Advanced	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	6	6	0

Comment: DAWN has a formal sourcing strategy aimed at influencing labour conditions. As part of the Evolution Group, DAWN operates under a unique model where both the brand and its manufacturing facility have the same owner. All DAWN products are produced at the Evolution Group's wholly owned factory in Vietnam, giving the brand full visibility into its production processes. This structure enables close collaboration between the brand and the factory to uphold high standards in working conditions.

DAWN's sourcing strategy explicitly focuses on increasing influence through consolidation. The brand aims to maintain a streamlined and transparent supply chain, prioritising long-term relationships with suppliers. This approach extends beyond final production to deeper levels of Dawn's supply chain. While the brand is open to collaboration with other buyers and has demonstrated it has reached out to them on several occasions, it has acknowledged challenges in making such partnerships effective.

Recommendation: DAWN could include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Advanced	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	6	6	0

Comment: Since the start of DAWN, all of DAWN's production has taken place at its own facility, reflecting the brand's focus on maintaining long-term relationships. Nevertheless, this year the brand has taken a further step by developing formal contracts to solidify the relationship between the brand and its factory.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

Comment: DAWN has conducted an Excel-based risk assessment covering its entire Tier 1 supply chain, which consists of its own production facility in Viet Nam. The assessment evaluates risks across Fair Wear's eight labour standards, using a scoring system based on likelihood and impact.

The brand's assessment does not distinguish between country-level risk scoping and factory-level risk assessment. However, to develop the final risk analysis, DAWN gathered risk information on all relevant risk factors, which are described in a separate narrative document. These risk factors include sector-specific risks, country and regional risks, product-related risks, and business model risks. Sourcing model risks are not explicitly specified, but they are included within other risk factors. In addition to human rights risks, the analysis also includes environmental and governance risks.

Because the country and factory assessments are combined, there is no separate evaluation of risk impact at the scoping level. This limits the brand's ability to clearly differentiate between systemic country risks and factory-specific issues. Nonetheless, the identified risks described in the narrative report are accurate and relevant. The main risks for Viet Nam include restricted freedom of association, excessive overtime, and wage-related issues. The brand also considered the heightened health and safety risks associated with denim production, as well as the reduced risk of overtime due to its predictable production cycles.

DAWN's risk analysis includes a comprehensive gender lens, identifying gender-specific impacts for each of the eight labour standards. To incorporate supplier and stakeholder input, the brand conducted a broad questionnaire and interviews covering key risk areas. The risk assessment was also discussed with worker representatives.

Since all DAWN's production takes place in its own facility, the risk scoping has not influenced sourcing decisions. For supporting processes, the brand primarily works with suppliers in Viet Nam. Therefore, DAWN's sourcing strategy does not include a preference for sourcing from countries where workers can freely form or join trade unions and engage in collective bargaining.

Recommendation: Fair Wear recommends that DAWN conduct a distinct country-level risk scoping exercise separate from its factory-level risk assessment. The brand is also recommended to specifically define its sourcing model risks.
Fair Wear strongly recommends DAWN to privilege countries where workers can freely form or join a trade union and/or bargain collectively, and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: DAWN exclusively produces at its own factory and regularly shares Fair Wear membership requirements with the factory. Since DAWN's founding, no additional suppliers have been onboarded, and there are currently no plans to expand the supplier base. However, DAWN has established an onboarding process for potential future suppliers, which is described in its HRDD policy. This process includes informing new suppliers about Fair Wear membership and requiring them to sign and commit to the Code of Conduct.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	2nd+ year member and no new production locations selected.	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	N/A	6	0

Comment: DAWN did not onboard any new suppliers in the past year. However, its standard onboarding process, outlined in its HRDD policy, includes collecting human rights information from potential suppliers through existing third-party audit reports, site visits, and discussions with management. New suppliers are also required to sign and commit to the Code of Conduct and develop a preliminary Corrective Action Plan (CAP).

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, and social dialogue mechanisms within the first year of starting business.	No production locations in the first year of business.	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	N/A	6	0

Comment: In the previous financial year, DAWN has not added any new suppliers.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Advanced	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	6	6	0

Comment: DAWN has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. The brand maintains a dedicated Excel-based tool to track the most significant risks at its production site, scoring each risk based on likelihood and impact. This assessment is updated at least every six months through collaboration between DAWN's CSR team and the CSR staff based at the factory.

The risk assessment draws on a variety of sources, including country and regional risks, Fair Wear's onsite assessment conducted in 2023, external audits, and a risk assessment survey completed by relevant staff at both the brand and the factory. Additional data is collected from the factory on wages and overtime, and internal grievances.

The brand gathers insights using tools such as stakeholder surveys and interviews with supplier staff. The factory's CSR team, which works for the same holding as DAWN, always plays a key role in this process, regularly engaging with workers and their representatives to identify and continuously monitor risks. Additional insights are drawn from Fair Wear's onsite assessments and the outcomes of Fair Wear training sessions.

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

Comment: DAWN has mapped the risks to FoA in Viet Nam and can explain the main risks for this country. In addition, DAWN can explain the main risks of violations to FoA at its suppliers, including the risks specific to women workers. At its factory, a collective bargaining agreement (CBA) is in place, along with formal worker representation, a union representative, and the majority of workers are union members.

The member has supplier-level monitoring in place to assess and understand the risk at suppliers. This includes tracking engagement with the union, reviewing notes from meetings and grievance mechanisms, and conducting onsite assessments. Through this monitoring, the brand has identified that the primary issues relate to a lack of awareness and limited effectiveness of the worker representation structures.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, to foster a better understanding of gendered implications.	Advanced	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	6	6	0

Comment: DAWN has integrated a gender lens into its risk assessment by identifying and describing the potential gendered impacts across all labour standards. For example, the brand identified a high likelihood of a gender pay gap, underrepresentation of women in leadership roles, and a dual burden faced by women related to excessive overtime due to domestic responsibilities.

In addition to identifying these risks, DAWN has taken concrete steps to collect gender-disaggregated data at the factory level over the past two financial years. This includes data on wages, overtime, union participation, and the number of women in leadership positions. The brand has begun analysing this data and has already uncovered a small gender pay gap, primarily due to higher-paid positions being predominantly held by men. A deeper analysis is needed to understand the root causes.

Another important insight from the data was that women on maternity leave were not receiving the same annual bonuses as other workers. In response, a policy change was established in the factory to ensure that this practice is corrected moving forward. The brand plans to expand its gender data analysis in the coming year by collecting additional indicators.

The member has not yet specifically looked into how its business practices affect gender at its suppliers.

Recommendation: Fair Wear recommends that the member further analyse the gender data collected at factory levels. Fair Wear's gender instruments can be helpful.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Advanced	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	4	4	0

Comment: DAWN does not evaluate its suppliers' human rights performance as a separate process. However, because of its unique supply chain structure, the overall collaboration is evaluated and the factory also provides feedback on DAWN's practices. Human rights and social compliance are embedded in the way DAWN conducts its business, forming an integral part of daily operations rather than being treated as isolated criteria. As DAWN only produces at its own facility, the alignment between sourcing decisions and human rights performance is inherently built into the brand's business model.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Advanced	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	4	4	0

Comment: DAWN's sourcing strategy clearly prohibits unauthorised subcontracting. Since the brand and its factory share the same ownership, all factory invoices are fully traceable. Additionally, DAWN maintains a strong on-site presence, further reducing the risk of unauthorised subcontracting.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	2	4	0

Comment: DAWN knows its suppliers use two homeworkers for specific embroidery work. In the last two financial years, the brand has started collecting information such as the address, contract, number of pieces produced and payment slips to assess whether there is a risk of exploitation.

The member is still defining a structured method for monitoring and ensuring responsible sourcing from homeworkers.

Recommendation: DAWN is recommended to ensure the suppliers that work with homeworkers do so in a responsible way.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Advanced	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	4	4	0

Comment: DAWN has formalised its relationship with its supplier in Viet Nam through a written contract. These contracts support the implementation of human rights due diligence by including commitments to Fair Wear standards and quarterly CSR reporting. It also specifies the calculation of a living wage using the Anker Methodology and requires quarterly overtime reporting to assess DAWN's impact on working conditions.

Additionally, the contracts clearly outline the shared responsibilities of CoLP implementation. For example, DAWN commits to placing NOS (Never Out of Stock) orders if the factory faces capacity shortfalls, and it covers any upcharges resulting from not meeting the Minimum Order Quantity (MOQ).

The contract sets payment terms at 90 days after shipment, which is longer than Fair Wear's recommended 60 days. DAWN explains that, due to shared ownership with the factory, cash flow is managed at the group level, and therefore, it cannot commit to a shorter payment term. However, at the start of DAWN, Evolution Group provided DAWN with a loan, which the brand has begun repaying with interest. These loan terms are also included in the contract. For subcontractors, the supplier does maintain a 30-day payment term.

Recommendation: Fair Wear recommends DAWN to reduce payment terms to 60 days upon goods being loaded on the vessel and include agreements on the provision of materials in the contract.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in its decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The commitment to human rights and responsible business is embedded in the vision and mission of both DAWN and the Evolution Group, and this is well understood across the organisation.

However, the member has not yet included responsible business practices in job role competencies for non-CSR staff, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

Recommendation: DAWN could include responsible business practices in its job role competencies of sourcing and purchasing staff. DAWN could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

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

Comment: DAWN's supply chain structure enables a high level of visibility and control over its impact on working hours. The production facility in Viet Nam has full access to production planning, and the materials purchasing team is located in the factory.

For collection pieces, DAWN uses a backwards planning approach where the team plans production for the next 12 months. This long-term planning helps the factory prepare well in advance and manage workloads more evenly.
A large portion of DAWN's business consists of Never Out of Stock (NOS). These items are forecasted on a 12-month basis, which allows the factory to plan fabric purchases and production schedules more efficiently. When other customers cancel orders, DAWN works directly with the factory to see if additional NOS items can be produced instead. This flexibility helps maintain a steady workflow and reduces production pressure.

DAWN maintains weekly coordination calls with the factory to review production schedules. Order allocation is done together, keeping the factory capacity in mind. Importantly, the factory retains autonomy in scheduling production according to its internal planning. This flexibility helps maintain efficiency and minimises the need for overtime.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	4	6	0

Comment: DAWN has a strong understanding of wage levels at its suppliers and collects open costing for all styles, including the cost of manufacturing (CM). In the past, the brand manually calculated labour costs by collecting labour minute data per style. However, the brand found this approach ineffective within DAWN's supply chain, as the data did not reliably reflect the actual time workers spent on production. Moreover, DAWN chose not to isolate labour costs for its own production, as it aims to contribute to living wages for all workers at the factory, regardless of whether they produce for DAWN.

As a result, the brand no longer uses labour minute data to link buying prices directly to wages. Instead, it monitors whether wages meet the Anker living wage benchmark and ensures that any increases in labour costs are reflected in the total FOB price.

Recommendation: Fair Wear recommends DAWN to explicitly link its buying prices to wages.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding HRDD and Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Advanced	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	4	4	0

Comment: DAWN's sourcing model purposely excludes the use of sourcing intermediaries.

Layer 3 Prevention, mitigation and remediation

Possible Points: 86
Earned Points: 82

Indicators on the quality and coherence of a members' prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into risk prioritisation and creates subsequent action plans.	Advanced	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	6	6	0

Comment: Based on the risk identification as described in chapter two, DAWN has linked factory risks to appropriate follow-up. The action plan is shared between the brand and the factory, and progress on the action is discussed every quarter, including any necessary adjustments.

While the risk assessment actions focus on ongoing monitoring and prevention, such as through organising training. The brand separately follows up on CAP actions aimed at remediating specific issues found during onsite assessments. However, the connection between these two processes remains unclear. For instance, in the risk assessment, some actions for high-likelihood risks are marked as completed in 2023, yet the risk prioritisation has not been updated, and no new actions have been defined. It is possible that these risks are now being addressed through the CAP, but this is not explicitly documented.

Recommendation: Fair Wear recommends that the member complete its action plans further, ensuring that all prioritised risks are linked to concrete follow-up actions. Additionally, the brand should integrate its risk assessment and CAP processes more clearly, as this would enhance coherence and traceability in DAWN's overall risk follow-up.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: DAWN has started collecting and analysing gender data at its production location. One concrete outcome of this work has been the revision of the bonus policy to ensure that workers on maternity leave receive the annual bonus. In addition to this completed action, the brand has identified further steps to expand data collection and improve its analysis. However, it has not yet developed specific follow-up actions to address the gender-related issues identified through this analysis.

Recommendation: Fair Wear recommends DAWN to make the gender lens in its action plans more comprehensive.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Advanced	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	6	6	0

Comment: DAWN included comprehensive steps to encourage FoA and effective social dialogue in all its action plans. These include organising Fair Wear and internal trainings, collaborating with the local union to raise its visibility, promoting the worker committee, and documenting how information is shared with workers. In addition, the brand aims to create an environment where workers feel proud to be part of the brand and confident to speak up when issues arise. The brand does this by spending time on location, eating in the canteen together with workers and organising staff parties.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Advanced	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	6	6	0

Comment: DAWN actively monitors the effectiveness of factory-level grievance mechanisms by reviewing submitted grievances, conducting on-site assessments, and engaging directly with both worker representatives and individual workers.

To further support the grievance mechanism, the brand organises training sessions and explores new ways to gather worker feedback, for example, by asking workers to rate the food provided at the facility. While most grievances tend to focus on food-related issues, several more serious concerns were raised in the last financial year regarding factory management. These were submitted through the internal grievance mechanism and ultimately led to a change in management.

Workers' willingness to raise both minor and serious issues reflects a degree of confidence in the grievance mechanism.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Intermediate	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	4	6	0

Comment: DAWN does not share suppliers with other Fair Wear members. However, it collaborates with Fair Wear members in projects outside of the factory, such as the Sustainable Textiles Switzerland (STS) 2030 project 'United for Fair Wages'.

In its supplier, the brand cooperates with other buyers on CAP follow-up and responding to grievances. It has also made several attempts to collaborate with other buyers on preventive actions, but these efforts have not yet led to any concrete outcomes due to other buyer's unwillingess.

Recommendation: We recommend DAWN also work together with other buyers on preventing human rights violations.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	78%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

Comment: During the performance check, DAWN could demonstrate it has followed up on 80% of all outstanding actions. These actions are linked to the CAP of one full assessment conducted in the previous two financial years.

Examples of improvement actions that were taken include training workers on health and safety policies and the Collective Bargaining Agreement, and ensuring proper documentation of negotiations between management and worker representatives.

Most resolved actions pertain to health and safety and freedom of association, while actions toward meeting the Asian Floor Wage living wage benchmark are still outstanding.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Advanced progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	6	6	-2

Comment: During the 2023 Fair Wear onsite assessment, 10 of DAWN's open findings were reviewed, of which 7 were found to be resolved. At the time of the brand performance check, 7 findings were open, 5 of which were marked by the brand as 'ready for validation,' meaning DAWN believed they were resolved but had not yet been formally validated.

DAWN has identified the root causes behind all findings and discussed them with its suppliers. One key issue was a lack of awareness among new staff regarding health and safety and CBA policies. To address this, the member implemented preventive measures such as targeted training.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no action plan is needed.	No factories in the respective risk profile	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	N/A	6	0

Comment: DAWN has no suppliers where action plans are not needed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Advanced	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	6	6	0

Comment: In the past two financial years, no findings of excessive overtime were identified during Fair Wear's on-site assessments or in external audits. However, as excessive overtime is a high risk in the country, the brand still prioritises this risk in its monitoring and action plan. The brand collects overtime data for all workers and conducts quarterly analyses. When overtime is detected, the root causes are examined on a case-by-case basis.

For example, in the last financial year, DAWN found that cleaners were working more overtime than the average worker. Upon investigation, it was discovered that company policy required a cleaner to be present whenever production was running. DAWN is now planning to revise this policy to ensure overtime remains manageable for cleaners.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Advanced	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	4	4	-2

Comment: In the previous year, no external audits or Fair Wear onsite assessments included findings regarding non-payment of legal minimum wage or legally required wage elements.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	6	6	0

Comment: The wages of DAWN's factory meet most benchmarks. In addition to these benchmarks, DAWN conducts its own annual research to assess workers' cost of living and verify whether the Anker benchmark remains appropriate.

DAWN collects wage data for all workers and compares it against living wage benchmarks using the Anker methodology. This data is reviewed quarterly, and any cases of workers earning below the benchmark are investigated individually. For instance, one review revealed that workers on maternity leave were not receiving the same annual bonuses as others. DAWN has since updated its policy to correct this.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Advanced	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	6	6	0

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

In the past financial year, the factory formed a wage working group, including workers, worker representatives, unions, and staff, to review and redesign its salary scheme. The group found that while minimum wages were relatively high, maximum earnings were limited, especially for skilled workers and those seeking higher income. Without a piece-rate system, these workers had fewer opportunities to increase their pay. The factory is now exploring a new structure that balances income security with performance-based incentives. Any wage increases following this new salary scheme will be calculated in the FOB price of the brand.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	100%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	6	6	0

Comment: The 2023 Fair Wear assessment validated that production workers at DAWN's factory in Viet Nam received wages which met most living wage standards

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear's Access to Remedy Policy.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

Comment: DAWN received no grievances in the past two financial years.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Advanced	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	6	6	0

Comment: DAWN has some CAP findings where training is a recommended follow-up action. In 2023, the brand organised a Fair Wear communication program at its factory. In addition to external training. The brand and factory regularly organise internal training on the different labour standards to reinforce awareness and compliance.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Advanced	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	6	6	0

Comment: DAWN followed up on the implemented training by ensuring the information shared in the training through different communication channels.

Additionally, the member used the results of the training as input for its human rights due diligence by including the results in its risk assessment.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights due diligence system includes a responsible exit strategy.	Advanced	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	4	4	0

Comment: DAWN's human rights due diligence system includes a responsible exit strategy, which is described in its HRDD policy. DAWN and its tier-one supplier share the same owner, the responsible exit strategy only applies to subcontractors and suppliers beyond tier-one. The responsible exit strategy is shared and discussed with all suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Basic	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	2	6	0

Comment: DAWN undertakes human rights activities that go beyond Fair Wear's scope by extending parts of its due diligence approach to tier 2 factories. This includes conducting risk assessments and monitoring activities at that level. The brand is also working to expand its living wage strategy deeper into the supply chain. As part of this commitment, DAWN has joined the STS2030 project on Fair Wages.

Recommendation: Fair Wear encourages DAWN to go beyond the Fair Wear policy or scope requirements and apply its full human rights due diligence approach for its deeper supply chain.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22
Earned Points: 20

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

Comment: DAWN communicates accurately about Fair Wear membership on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: DAWN does not sell external brands.

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

Comment: DAWN has submitted its social report, which Fair Wear reviewed.
DAWN has also published the report on its website.

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

Comment: DAWN reports on factory-level data and remediation results.
The factory level data DAWN included are the factory name, the main risks in the factory and the time-bound prevention, remediation and mitigation action plan.

Recommendation: DAWN is recommended to publish a complete factory list for the deeper tiers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

Comment: DAWN has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations.
The internal evaluation system involves top management.
In its evaluation system, the member includes triangulated information from external sources, such as the supplier. Workers and worker representation are not yet systematically included in the evaluation.

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

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

Comment: The previous performance check included the following requirements:
1.8 Fair Wear membership should be communicated according to the Fair Wear communications policy.
2.12 DAWN should identify whether homeworkers are used by its suppliers and assess if there is a risk of exploitation.
2.13 DAWN needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence.
DAWN followed up on all requirements.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Not applicable

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

Recommendations to Fair Wear

DAWN recommends that Fair Wear take a more active role in connecting members as this could significantly enhance the visibility of Fair Wear and its members. The brand would like Fair Wear to create more structured opportunities for sharing best practices and to offer clearer pathways for brands to connect when working on similar topics. Additionally, DAWN finds that the Member Hub is not very user-friendly, particularly for teams working remotely or across different locations. Improving the platform's usability and integration with members' internal systems would support more efficient engagement.

Brand Performance Check details

Date of Brand Performance Check: **10-06-2025**
Conducted by: **Sanne Beukers**
Interviews with: Marian von Rappard - Evolution Lab & Dawn Denim Owner
Benjamin Geourjon - Dawn Denim, CEO
Quang Tran - Evolution Lab, CEO
Anna Marie Pawliczek - Dawn Denim, CSO
Sandra Gonza - Evolution Group, HRDD Advisor/Consultant