# Brand Performance Check

## W.A.R.D. GmbH (Iriedaily)

### Publication date: August 2025

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: 198
Benchmarking Score: 87
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% | 94% | 100% | 92% | 73% | 75% | 100% |

## Summary:

This performance check report includes Iriedaily's financial years 2023 and 2024.
The member has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 87, the member is placed in Leader category.

In the last two financial years, Iriedaily conducted a comprehensive country risk scoping and factory risk assessment, including a gender analysis for each labour standard. In addition, the brand has analysed the risks related to its business model, purchasing practices and products. In most cases, the member has coherently assessed the severity and the likelihood of each risk.
The brand's sourcing strategy is focused on long-term business relationships. It privileges suppliers already committed to improving working conditions and, in the case of new suppliers, favours sourcing countries where freedom of association (FoA) and social dialogue are permitted by law.
Iriedaly has introduced contracts with almost all its suppliers, ranging from three to five years. The contractual agreement is aligned with the Common Framework for Responsible Purchasing Practices and supports the implementation of HRDD.

Iriedaily relies on Fair Wear assessments, external audits, and visits as its main monitoring tools. In the last two financial years, the brand added five new suppliers in China, Germany, India, and Portugal. Although the brand favours FoA-friendly countries, it agreed to onboard an additional subcontracting partner to support the main supplier's production process in China. Ireidaily carefully selected suppliers who are committed to working responsibly and within the HRDD framework.
In addition, Iriedaily conducted/collected audits to assess the human rights conditions at these production locations or selected suppliers from which other Fair Wear members source. However, the brand didn't enrol any of these new suppliers in onboarding training programmes.

Iriedaily has developed comprehensive and coherent action plans to follow up on the assessed risks at its suppliers. Moreover, the member focused on improving gender equality and enrolled one of its Indian suppliers in a supervisory training for women workers that proved to be extremely successful. The brand has developed a plan to support FoA and social dialogue across its supply chain and actively monitors and supports factory-level grievance mechanisms. In addition, the brand collaborated with other Fair Wear members to prevent and mitigate potential and actual harms; however, the brand was not successful in finding non-Fair Wear members willing to collaborate on HRDD.

The brand discussed the topic of living wages with some of its main suppliers, determined the living wage estimates for all its sourcing countries and started to test out some approaches, paying its share of living wage at 56% of its production locations.

Fair Wear recommends that the brand continue implementing its solid HRDD approach, gather information on the wage estimates for all its Chinese suppliers to develop a solid strategy across its supplier base for the payment of living wages, and verify the effectiveness of its preventive, mitigating, and remediation actions.

# 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 W.A.R.D. GmbH (Iriedaily)

## Member company information

Member since: 1 Jan 2016

Product types: Garments, clothing, fashion apparel, Bags and Accessories

Percentage of turnover of external brands resold 0%

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 |
|---|---|---|
| Portugal | 16 | 49.14% |
| China | 8 | 44.19% |
| India | 2 | 6.55% |
| Germany | 1 | 0.13% |

# 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:** Iriedaily has a solid Human Rights Due Diligence (HRDD) policy in place.
Fair Wear recommends including the brand's approach towards internal grievance mechanisms in its HRDD policy.

**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:** Iriedaily discloses 93% 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:** Iriedaily discloses 93% 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: 90**
**Earned Points: 86**

## 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:** Iriedaily has a sourcing strategy addressing influencing labour conditions.

The member has 28 active suppliers.
69% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers.
2% of the production volume comes from suppliers where Iriedaily buys less than 2% of its total FOB.

Compared to the previously checked financial year, the number of factories with at least 10% brand production volume has decreased. As production was moved to suppliers with more capacity than the previous ones, the leverage has decreased.

Iriedaily's sourcing strategy explicitly focuses on increasing influence through consolidation and active cooperation with other clients who are also Fair Wear members.

| 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:** Iriedaily has a sourcing strategy that focuses on maintaining long-term relationships.

89% of the member's total FOB volume comes from suppliers with whom Iriedaily has a business relationship for at least five years.

The member commits to long-term contracts with almost all its suppliers. Some suppliers didn't want to sign contracts with Iriedaily as this approach is considered not in line with their business model. These contracts usually range from three to five years, depending on the suppliers' preferences.

The long-term contracts are embedded in Iriedaily's sourcing strategy, ensuring they are implemented across its supplier base.

| 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. | Advanced | 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. | 6 | 6 | -2 |

**Comment:** Iriedaily conducted a comprehensive risk scoping. It includes the risk factors for the eight international labour standards as included in the Fair Wear Code of Labour Practices, the business model, the purchasing practices and products. In relation to its business model (fashion brand), Iriedaily has identified a high risk of excessive overtime due to the different styles and the production taking place during the peak seasons. In addition, the member has determined the likelihood and severity of each risk in its supply chain and has coherently established the priorities to prevent and/or mitigate those risks. In its risk scoping, Iriedaily included input from workers and suppliers.

The risk scoping includes a gender lens. The member has used the Fair Wear gender fact sheets, the gender analysis of the Code of Labour Practices and the learning modules on gender risks in the garment and footwear sector to determine the risks that women workers face in the supply chain.

Based on the brand's risk scoping, the main risks in China are excessive overtime, discrimination, lack of occupational health and safety, limits to freedom of association and social dialogue, unauthorised subcontracting and undeclared use of homeworkers.
As it is generally known and accepted that China presents a high risk of forced labour, Iriedaily has decided to exit some factories that were not committed to improving working conditions and were not transparent with the brand. In addition, Iriedaily started to source cotton that is GOTS-certified to reduce the risks of buying cotton produced with forced labour.
In India, the brand has identified all labour standards as high or very high risks.
However, the brand has not correctly identified the level of risk for child labour and occupational health and safety in China and India.
In Portugal, the brand has identified a few low risks: discrimination, occupational health and safety, unauthorised subcontracting and undeclared use of homeworkers. On the other hand, the brand has identified a high risk of wages below the living wage.
In Germany, the brand has identified low risks only with the exception of wages below living wages and discrimination, including gender-based discrimination.

The member adjusted its sourcing strategy based on the risk scoping, as the outcomes of the risk scoping are included in decision-making regarding countries from which to source. In particular, the brand has decided to move some of its production to Portugal and Germany to reduce human rights risks. In addition, Iriedaily's sourcing strategy mentions a preference for countries where workers can freely form or join a trade union and/or bargain collectively.

**Recommendation:** Fair Wear recommends Iriedaily to review the level of risk for child labour and occuprational health and safety for China and India.

| 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:** It is the standard process for Iriedaily to inform new suppliers about its HRDD policy and Fair Wear membership by sharing the Fair Wear Code of Labour Practices, the questionnaire, the health and safety checklist, and the Worker Information Sheet. This process has been followed for all five suppliers added in the last two financial years.

Additionally, as part of Iriedaily's onboarding process for new suppliers, the brand started a dialogue with the new five suppliers about human rights and how the supplier and Iriedaily can cooperate on this topic.

| 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. | Advanced | 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. | 6 | 6 | 0 |

**Comment:** Iriedaily always collects human rights information on potential new suppliers by collecting self-assessments and existing audit reports, organising Fair Wear assessments, and selecting suppliers shared with other Fair Wear members. According to the member's onboarding process, if a potential supplier is not willing to share audit reports or have audits before the beginning of the business relationship, the selection process stops.

The brand investigates whether internal grievance mechanisms are present. Moreover, Iriedaily's sourcing strategy privileges suppliers where workers are free to form a trade union and/or bargain collectively. Before starting the business relationship, the brand collects information on the presence of trade unions in the factories and, if worker representatives are present, including their gender distribution.

Iriedaily followed this process to select new suppliers in the last two financial years. Based on the human rights information collected through this process, the member adjusted its sourcing decisions. In 2023, Iriedaily added two new suppliers in India, where another Fair Wear member is also sourcing, leading to increased leverage. In particular, a Fair Wear assessment was conducted at one of these factories in 2023, and the related information was shared by another Fair Wear brand with Iridaily.
In 2024, the brand also onboarded three other suppliers in China, Portugal, and Germany that demonstrated their commitment to improving working conditions in their factories.

| 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. | Intermediate | 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. | 4 | 6 | 0 |

**Comment:** In the previous two financial years, Iriedaily added five new suppliers in China, Germany, India, and Portugal, three of whom are subcontractors.

Iriedaily has shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The Worker Information Sheet has been posted.

Iriedaily has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue. Although Iridaily has onboarded a supplier in a low-risk country (Germany), the onboarding training should still take place.

**Recommendation:** Iriedaily is recommended to organise onboarding sessions for all its suppliers specifically focusing on the CoLP and the grievance mechanism within the first year of doing business, including in low-risk countries.

## 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:** Iriedaily has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for all its production locations. It has determined the appropriate monitoring tools and frequency per production location.

In China and India, the brand relies on Fair Wear assessments, audits, factory visits, and requests for pictures of production locations. In China, the brand has also investigated the risk of forced labour and taken appropriate actions wherever necessary, as illustrated under indicator 2.3. Regarding the payment of the legal minimum wage, Iriedaily assessed the risk as low; however, Fair Wear assessments from 2024 showed that some wage components were not paid.
In Portugal, the brand used to rely on calls and factory visits to assess human rights risks. Iriedaily has now added a new monitoring tool, as it collected existing audits and recently received the related corrective action plans (CAPS). In addition, the brand plans to conduct a more extended and reliable audit for its main suppliers.
In Germany, the brand relied on calls and factory visits.

At this stage, the brand relies on its main suppliers to monitor subcontractors as it doesn't have a direct business relationship with the latter.

Some monitoring tools do explicitly include worker, stakeholder and/or supplier input (e.g., Fair Wear assessments).

**Requirement:** Fair Wear recommends that the member brand provide training to the main suppliers on monitoring subcontracting partners. In addition, Fair Wear strongly recommends that Iriedaily review the score given to the payment of the legal minimum wage in China and consequently adapt its monitoring tools in relation to this risk.

| 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:** Iriedaily has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers.

According to the member, freedom of association and social dialogue are protected only on paper in China. Workers are able to join only one trade union, which was founded by the government and is under its control.
Iriedaily conducted a questionnaire on social dialogue and FoA at its main suppliers in China. Based on the answers received, the brand understood that the questions were too direct and that they should approach the topic differently. Based on the brand's analysis, workers are unable or unwilling to organise differently, or they would risk their lives and jobs. However, many suppliers have worker representatives. During factory visits, the brand engaged in conversations with them and discussed the importance of social dialogue and workers' rights.
In India, social dialogue and FoA are pretty limited; suppliers don't generally envision these topics well, while workers do not have the necessary knowledge or understanding of these rights. However, Iriedaily is engaged on these topics with its suppliers. According to the brand, the suppliers have workers' committees in place as required by the local labour law and are willing to work with the brand to improve dialogue between workers and factory management.
In Portugal and Germany, the state protects FoA and social dialogue, and workers are free to join trade unions if they want. According to the brand, workers are not at risk of retaliation if they exercise their rights.

Iriedaily knows which of its main suppliers have trade unions and CBAs in place. However, the brand has yet to map risks to FoA and conduct social dialogue for its subcontractors. The brand assesses and monitors the risks to freedom of association and social dialogue via Fair Wear assessments, the questionnaire, and, if present, by engaging with worker representatives during factory visits.

**Recommendation:** The member is recommended to assess the status of FoA at each of its suppliers including subcontractors. Iriedaily could use, for example, the Supplier Questionnaire (tool 2 in Fair Wear's FoA Guide), modular assessments on Social Dialogue, in-depth discussions with suppliers, or a full or modular assessment.

| 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:** Iriedaily has included gender in its risk scoping for each Code of Labour Practices. The member could show that it understands the main gender risks for its sourcing countries.

Additionally, Iriedaily actively collects gender data per factory. In particular, the brand created a supplier questionnaire to assess the agency, economic opportunities, leadership, health and safety, and gender-based violence at its suppliers. The brand has developed questions for each index using the gender data impact tool. In addition, the brand collected gender disaggregated wage data and scored the gender pay gap as low risk. However, the brand couldn't collect data for all of its questions. Iriedaily analysed the gender-disaggregated data collected at the factory level and drafted actions to improve gender equality, including training for women supervisors at one of its Indian suppliers.
The member has not yet specifically looked into how its business practices affect gender at its suppliers.

**Recommendation:** Fair Wear recommends Iriedaily to look into how its business practices affect gender at its suppliers.
While the brand could try to collect the missing data, Fair Wear recommends continuing to analyse the data collected so far and drafting appropriate follow-ups.

| 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:** Suppliers' human rights performance is evaluated every year. Iriedaily has a strong and systematic evaluation system for assessing suppliers' human rights performance. Based on the findings collected with the selected monitoring tools, the brand's supplier evaluation system is based on the eight Code of Labour Practices, the level of transparency and the use of open costing. However, the brand does not yet include the existence and the effectiveness of internal grievance mechanisms in its evaluation.

The brand systematically integrates the outcome of this evaluation into its purchasing decisions. The supplier evaluation is shared across the relevant Iriedaily departments, including sourcing and buying. Based on the evaluation, suppliers with higher scores may receive more orders, provided that there is a poll of suppliers specialised in producing a specific product. Suppliers with lower scores are asked to improve with the support of the member. However, if the supplier is unwilling to improve over a reasonable period, the brands may exit the factory.

Iriedaily shares the evaluation outcome with its suppliers and the worker representatives, if present.

**Recommendation:** Fair Wear recommends that the brand also include the existence and effectiveness of internal grievance mechanisms in its evaluation.

| 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:** Iriedaily uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations (and/or) subcontractors in the database.

The member takes measures to prevent unauthorised subcontracting or unknown locations, such as visiting production locations and knowing the supplier's capacity and skills, including those of subcontractors. In addition, the brand established in its contracts that subcontracting must always be authorised, and the violation of such contractual obligation may lead to the end of the business relationship.

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

**Comment:** Iriedaily has identified whether homework is prevalent in its sourcing countries.
According to the member, there is a very low risk of its suppliers using homeworkers because the CSR manager checked with the design team what products and processes are typically executed by homeworkers and asked its main suppliers if they would use homeworkers. The interviewed suppliers answered that the brand's products and processes are not suitable for homeworkers. Moreover, the brand knows the production capacity of its suppliers, including subcontractors and has assessed that there is no need for them to rely on homeworkers to produce its products. In addition, all Iriedaily's suppliers signed a document stating that they do not and will not use homeworkers to produce the brand's goods. Finally, none of the recently conducted Fair Wear assessments revealed any indication of the presence of homeworkers.

## 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:** In the previous brand performance check, the member didn't have any contracts to conduct business in its supply chain. In the last two financial years, Iriedaily introduced contracts with almost all its suppliers. Two suppliers in China and Portugal preferred not to have contracts, as this is not their preferred way of doing business with brands.

The member has negotiated agreements with its suppliers, gathering their feedback and making the necessary adjustments, also based on their needs and preferences. These contracts generally range from three to five years. Iriedaily's suppliers were favourably impressed with the brand's approach, treating them as equal business partners. Iriedaily developed a standard manufacturing agreement that stipulates terms of payment, liability, and penalties.
The terms of payment may vary from supplier, depending on their preferences. However, all suppliers are paid within a maximum of 60 days after the estimated time of departure (ETD).
As the brand doesn't have a direct business relationship with its subcontractors, the main suppliers, acting as intermediaries, pay the subcontractors. However, the brand is not aware of the terms of payment as the suppliers didn't want to share such sensitive business information.
The contract stipulates that in case of damages, the supplier has the right to rectify the defects at its own expense. If this is not possible, Iriedaily and the supplier negotiate the costs to repair the damaged goods in advance.
Iriedaily does not work with penalties for late delivery.

The contract outlines the shared responsibility between the member and the suppliers to implement HREDD, including fair payment terms to support the payment of living wages to workers. In addition, Iriedaily clearly takes the responsibility to prevent, mitigate, and remediate any potential or actual harm it may have caused, contributed to, or is linked to. The suppliers must comply with the Supplier Code of Conduct and are responsible for implementing HREDD at subcontractors and providing evidence of that.

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

**Comment:** Iriedaily shares relevant CSR information with other departments. There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. All the Iriedaily departments meet weekly to discuss various topics, including sustainability and human rights.

The member would include responsible business practices in job role competencies in the case of hiring.
The sourcing and purchasing staff work with KPIs that support good sourcing and pricing strategies. In particular, the sourcing and CSR departments must select sourcing countries whose human rights indexes are not below an internally determined threshold; the CEO and the buying department use KPIs to increase the buying prices to cover the brand's share of living wage at some of its suppliers.

| 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:** Iriedaily releases two collections annually: Spring/Summer and Fall/Winter.
To prevent overtime, the brand has introduced longer lead times and defined a delivery schedule with the main suppliers. Lead times are determined based on the time needed for procuring the fabric and other materials, shipping, and the capacities of the suppliers, including subcontractors. In the last two financial years, Iriedaily introduced the so-called critical path to make the production planning more efficient and prevent excessive overtime. In particular, a complete timesheet for each production phase and product is negotiated with all suppliers, and fabrics are pre-booked before orders are placed. The critical path should prevent delays and make clear where issues arise, being used also as a learning tool. The production phase for each of the collections is roughly three months. However, it may be longer depending on various factors, including the type of fabric.
Based on the business model risk scoping, the brand has set internal deadlines for designing products, ensuring that lead times are not reduced due to internal inefficiencies. As such, deadlines for each step in the process are updated so that everyone is aware. When a certain step in the process is delayed, staff are requested to find alternative ways to either meet the deadline or work around it, and the supplier is consulted.
The brand knows the capacity of all its suppliers, including its subcontractors.
The production planning is evaluated with all suppliers to make necessary adjustments in the next planning phase.

**Recommendation:** Fair Wear recommends that the brand analyse its forecast accuracy at the end of each planning period and adjust its future forecasting.

| 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:** Iriedaily has a good understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Iriedaily has a good insight into the labour component of its prices and knows the number of actual sewing minutes needed for a style. In addition, Iriedaily knows the labour minute value at most of its suppliers.
In China, the brand has discussed the importance of open costing and transparency with all suppliers. So far, some suppliers are still unwilling to share open costing with the brand. Hence, Iriedaily uses the open costing knowledge of its main supplier as a reference (where workers generally have higher wages compared to other locations) when working on price development with other suppliers.
In India, the main supplier is very transparent and accepted to work towards living wages. As such, the labour costs are well known to the brand and the supplier proposes buying prices that would cover the payment of the brand's share of living wage.
In Portugal, the brand knows the labour costs and is working towards closing the gap between the legal minimum wage and the living wage.
In all cases, the sourcing team is informed that they cannot discuss price reductions unless it is linked to reductions in process/fabric, etc.
Iriedaily is aware of minimum wages for its supplier locations and uses audit reports to ensure that at least minimum wages are paid to workers at all production locations. Iriedaily always includes changes in legal minimum wage or inflation in its buying prices.

**Recommendation:** Fair Wear recommends that Iriedaily work with all its Chinese suppliers on trust building and open costing to ensure detailed knowledge about the wage levels per factory.

| 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:** Iriedaily works with intermediaries in China, India and Portugal. In particular, the brand has requested that its intermediaries sign the Code of Labour Practices and informed them of Fair Wear requirements.
In India and China, the main suppliers act as intermediaries. They have direct contact with subcontractors and are requested to follow up on action plans and remediation, if applicable.
In Portugal, the brand has been working with the same agent for the last 30 years. Iriedaily financially supports this agent to implement the Code of Labour Practices at its main suppliers by monitoring the supply chain, preparing meetings on relevant topics, collecting the signatures for the Code of Labour Practices and the occupational health and safety checklist and implementing the follow-up plans.

# Layer 3 Prevention, mitigation and remediation

**Possible Points: 86**
**Earned Points: 64**

## 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:** Iriedaily has prioritised risks and created action plans per supplier, counting for 93% of the total FOB. These match the risk profile. For example, the member identified discrimination as a high risk in India and women workers were offered training to become supervisors. In Chinese factories, the payment of social security is generally an issue; as such, the brand has planned training for the factory management on the legal requirements for social security due to workers.
Based on the risk identification as described in chapter two, Iriedaily has linked factory risks to appropriate follow-up for factories covering 93% of FOB.
Though the action plans detail the different approaches to prevent, mitigate, and remediate the prioritised risks and the timeline, they do not yet include the needed budget.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.2 Member company's action plans include a gender lens. | Intermediate | 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. | 4 | 6 | 0 |

**Comment:** In the last two financial years, Iriedaily has worked intensively on improving gender equality in its supply chain, and its action plans comprehensively include a gender lens.
In India, the brand has organised training for women workers at one of its suppliers to increase their chances of becoming supervisors, support their career opportunities, and set a positive example for other women workers. At the same supplier, the brand ensured that the creche facility would be available again for working parents. The brand, together with another Fair Wear member, also held conversations with the anti-harassment committee present at the factory to check if they were able to conduct their work and if any support from the brand was present.
In China and Portugal, the brand shared a flyer on the difference between substantive and formal equality to introduce the topic of gender equality. This led to an open and ongoing conversation between the brand and the suppliers on this topic. The brand is determined to offer more training to support the career opportunities of women workers, but has not been able to find a good training offer in the regions where it is sourcing in these two countries.

| 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. | Basic | 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. | 2 | 6 | 0 |

**Comment:** Iriedaily included some steps to encourage FoA and effective social dialogue in its action plans. In particular, the brand has held discussions with all its suppliers on the importance of social dialogue and FoA in factories. However, Iriedaily has met some resistance from its suppliers in China and India; as such, the member will continue to engage in discussion with its suppliers about this topic. In all its action plans, the introduction of workers' committees is the crucial step to support dialogue between workers and factory managers in countries where FoA and social dialogue are severely limited. In those factories where workers' committees are already present, the brand aims to organise capacity building to strengthen their role and position in the factory and, if possible, have more democratically elected and gender-balanced worker representatives. In addition to this, Iridaily is in discussion with all its suppliers to share non-retaliation letters to workers. The brand has yet to organise training to support social dialogue in its factories.

**Recommendation:** Iriedaily is recommended to support in financing/coordinating training on FoA and social dialogue for its suppliers.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.4 Member company actively supports a factory-level grievance mechanism. | Intermediate | 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. | 4 | 6 | 0 |

**Comment:** Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and are monitored systematically with audits and factory visits (e.g, by talking with worker representatives).

Iriedaily actively supports and monitors the effectiveness of factory-level grievance mechanisms. In particular, the member developed a strategy to support the creation or strengthening of such mechanisms. Based on this strategy, all production locations where Iriedaily is sourcing must have a complaints box and/or a workers' committee composed of four members with a gender-balanced representation. In particular, the workers' committees should have a written procedure outlining their role and the process to submit grievances, what the procedure looks like, the timeline, and the parties involved. In addition, these committees must inform the factory manager of the grievance and seek a possible remediation. At the same time, the factory management is responsible for informing workers of the available factory-level grievance mechanisms, discussing remediation with the workers' committees, and providing a room where workers' representatives can meet. However, the outlined strategy has yet to be implemented.
So far, the brand has enrolled some of its suppliers in the Fair Wear Onboarding training for suppliers and workers, where the topic of grievance mechanisms is also addressed.
In its supplier evaluation system, Iriedaily has yet to include the presence and effectiveness of factory-level grievance mechanisms.

**Recommendation:** Fair Wear recommends Iriedaily to ensure that the evaluation of factory-level grievance mechanisms of its suppliers is systematically considered in purchasing decisions.

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

**Comment:** Iriedaily cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints.
Iriedaily has tried to cooperate with customers who are not Fair Wear members by reaching out to them, but in more than one case, there was no interest in collaborating to prevent, mitigate or remediate human rights risks or violations.
Next to that, the brand cooperates in taking more preventive measures, such as organising training for women supervisors at one of its Indian factories together with another Fair Wear member brand.

## Indicators on implementation: improvement and prevention

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.6 Degree of verified actions. | 75% | 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, Iriedaily could demonstrate it has followed up on all the findings of the assessments and has solved 75% of the findings. In particular, these findings and follow-up actions are linked to CAPs of assessments conducted in the previous two financial years.
The most resolved actions pertain to workers' health and safety, the lack of proper contracts for all workers, workers' lack of knowledge of the Fair Wear grievance mechanism, and the availability of a creche facility for working parents. Actions on other labour standards are still outstanding.

The CAP issues that are still open are more complex or structural and, therefore, require more time to be remediated. However, the brand could demonstrate that it is following up on issues concerning social dialogue in the factories and the payment of social security to all workers.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.7 Degree of progress towards implementation of prevention programme. | Intermediate 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. | 4 | 6 | -2 |

**Comment:** Iriedaily has identified some root causes of the CAP issues and discussed these with its suppliers, including discrimination towards women in India and the lack of social security for many workers in Chinese factories.
The member has planned and, in some cases, implemented some preventive steps. In China, the brand plans to conduct factory management training on the local law requirements regarding workers' social security. In India, the brand, together with another Fair Wear member, has organised training to improve the economic opportunities and career growth of women workers.

**Recommendation:** Fair Wear recommends Iriedaily to validate the progress of the adopted preventive actions in the next financial year.

| 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:** According to the brand, all its factories need follow-up plans.

| 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 last two financial years, one assessment report (China) of the three total Fair Wear assessments mentioned excessive overtime.
The member has analysed the root causes of excessive overtime at all factories where a Fair Wear assessment took place. According to the member, unrealistic delivery requests from clients, overbooking by factory management and wages below the living wage are significant causes for excessive overtime.

The member has taken action to address the root causes. In particular, Iriedaily improved its planning with the introduction of the critical path method and is in constant contact with suppliers to monitor how the production is going; signed contracts with almost all its suppliers to provide them with more security and financial stability; works together with some of its supplier towards the payment of living wages to reduce the risk of excessive overtime due to the low wages received by workers.
Iriedaily could show that its efforts resulted in reduced excessive overtime at one Chinese supplier.

| 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 last two financial years, one out of three assessments included findings regarding non-payment of legally required wage elements, including the payment of statutory leaves and social security, at one supplier in China. The brand immediately followed up with the supplier, who made wrong calculations and is not fully aware of the legal requirements for social security. Iriedaily asked to provide workers with compensation and will ask for evidence during the next factory visit. During the brand performance check, the brand could show evidence that all outstanding findings of earlier financial years had been adequately resolved and closed. The member has yet to include worker representatives in the follow-up for these findings.

**Recommendation:** Fair Wear recommends that the brand include the worker representatives, where present, in the follow-up of these findings.

| 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. | Basic | 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. | 2 | 6 | 0 |

**Comment:** Iriedaily has a basic overview of the wage levels at its suppliers.
Iriedaily discusses the topic of wages with its main suppliers in China, India and Portugal. In China, the brand knows the wage levels of one of its suppliers; however, other suppliers don't want to share the wage data. In India and Portugal, the brand knows the wage levels of workers.

The brand has yet to conduct a comprehensive root-cause analysis of wages that are lower than living wages. In particular, the brand is not aware of the internal and external processes that affect wages.

**Recommendation:** Fair Wear recommends Iriedaly to conduct a comprehensive root cause analysis of wages below the living wage necessary to develop a systemic and time-bound approach. In addition, Fair Wear recommends that the member brand conduct Fair Wear assessments to learn about the wage levels at the suppliers that don't yet share this information.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.12 Member company determines and finances wage increases. | Intermediate | 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. | 4 | 6 | 0 |

**Comment:** Iriedaily has started to address the topic of living wages internally. In particular, the CEO is involved in the topic with the CSR department; labour costs are not negotiable, and the member is aware of the living wage estimate for all its sourcing countries.
To increase wages at its suppliers, Iriedaily finances the brand's share of the living wages through the cost of its products.
Working with some of its suppliers, Iriedaily has an ad-hoc plan regarding the finance wage increases across its supplier base. The member is aware of and has selected the living wage estimate for all its sourcing countries, together with its suppliers.
In China, the brand works on this topic with suppliers who are more transparent. In particular, the brand pays an annual bonus to the workers.
In India, the brand pays its share of the living wage by increasing the buying prices.
In Portugal, where suppliers are resistant to paying living wages due to higher taxes, the brand is testing out some approaches, including the payment of food vouchers.

**Recommendation:** To ensure a unified and consistent approach, Fair Wear recommends Iriedaily to create a robust strategy for increasing wages in China and India, aiming to gradually implement living wages. This strategy must be integrated into the sourcing and pricing frameworks, include financial provisions, and detail a clear action plan. In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

| 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. | 56% | 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. | 4 | 6 | 0 |

**Comment:** Iriedaily uses fact-based costing to ensure its prices support the payment of a living wage estimate at suppliers (China, India and Portugal) responsible for almost 56% of Iriedaily's FOB. During the brand performance check, the brand could show evidence of its claims.

| 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:** Iriedaily received no complaints in the two past 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:** Iriedaily has some CAP findings where training is a recommended follow-up action.
The member has enrolled some of its suppliers with findings on the lack of knowledge of the eight labour standards, Fair Wear grievance mechanism, and internal grievance mechanism in the following training modules: WEP Basic and Onboarding Training for suppliers and workers. In particular, the brand enrolled three Chinese suppliers in the mentioned training modules. The brand enrolled one of its Indian suppliers in the Onboarding Training, but the supplier has yet to find a date to conduct the training.
Even though it is not part of a CAP, Iriedaily has organised, together with another Fair Wear member, training for women workers who aim to become supervisors at one supplier in India.
The Portuguese suppliers and the German supplier were not enrolled in any training module.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.16 Degree to which member company follows up after a training programme. | Intermediate | 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. | 4 | 6 | 0 |

**Comment:** Iriedaily followed up on the abovementioned training by implementing some of the suggestions in the training reports and meeting its suppliers to discuss the training and its benefits.
There are still some training results at one supplier in China that need to be addressed.
Additionally, the member used the results of the training for women workers as input for its human rights due diligence. In particular, one of the brand's focuses is gender equality; as such, the brand would like to offer training to increase economic opportunities to women workers across its supply chain.

**Recommendation:** Fair Wear encourages Iriedaily to follow up on all the training events after their completion.

| 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. | Intermediate | 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. | 2 | 4 | 0 |

**Comment:** Iriedaily's HRDD system includes a responsible exit strategy.
In the last two financial years, the member stopped with three suppliers, two in China and one in Portugal. In China, the brand stopped with one supplier due to its lack of transparency and commitment towards working sustainably. The other factory left was a subcontractor with whom the brand didn't have a direct relationship. While the brand didn't follow up on the steps to exit responsibility for these factories, its leverage at these production locations was marginal. In Portugal, the supplier had to close the factory for private reasons of the factory owner; as such, it was not a decision of the brand.
The brand discussed its responsible exit strategy with all its main suppliers.

**Recommendation:** Fair Wear recommends the brand to follow the steps outlined in its responsible exit strategy even when its leverage at the production locations is low.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope. | Member company's activities do not go beyond the indicators or scope. | Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2. | Overview of Human Right risk monitoring, remediation and prevention activities and processes. | N/A | 6 | 0 |

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

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

**Possible Points: 22**
**Earned Points: 22**

## 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:** Iriedaily communicates accurately about Fair Wear membership on its website.
The member also uses other channels to inform customers and stakeholders about Fair Wear membership. Iriedaily actively spreads the Fair Wear message by sharing a newsletter with its business partners and customers, posting on Instagram, maintaining a website page on sustainability, and adding the Fair Wear logo to the clothes tag. In addition, Iriedaily requires its sales agents to read the yearly social report. The member also trains the sales agents on Fair Wear membership and requirements to ensure that customers are informed about the brand's commitment to human rights.

| 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:** Iriedaily 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:** Iriedaily has submitted its social report, which Fair Wear reviewed. Iriedaily 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:** Iriedaily published its social report, which includes factory-level data and remediation results, on its website.
The factory level data Iriedaily included are: the FOB produced per each sourcing country, the factory list with gender-disaggregated data on the workforce composition, the presence of domestic migrant workers, what products and processes are executed in the factories, the union presence, and the average wage of workers. In addition to this, the brand shares the risks assessed per production location, the action plans, their status and the challenges it encountered.
Next to that, the member also publishes its full factory list and includes the time-bound prevention, remediation and mitigation actions it has supported for each supplier.

| Performance indicators | Result | Relevance of indicator | Documentation | Score | Max | Min |
|---|---|---|---|---|---|---|
| 4.5 Member company has a system to track implementation and validate results. | Advanced | 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. | 6 | 6 | 0 |

**Comment:** Iriedaily has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The member relies on Fair Wear's assessments, external audits, and factory visits to track progress. In addition, the brand requests its suppliers to share documentation, such as payslips, to check if its preventive and remediation actions have been implemented. The type of tracking tool and the frequency of monitoring depend on the issues at stake.
The internal evaluation system involves top management. In particular, the CSR team regularly informs the CEO about progress on the open CAPs and the status of the action plans.
In its evaluation system, the member includes triangulated information from external sources, such as its discussions with worker representatives and feedback from suppliers, for example, on production planning.

| 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: Iriedaily must start including a gender lens in the implementation of improvement or prevention actions; the member must include steps to promote FoA and social dialogue in its improvement or prevention action. This should be linked with the assessment of risks to FoA and social dialogue as part of its human rights monitoring; Iriedaily needs to use written contracts with all its suppliers that include shared responsibilities and support the implementation of human rights due diligence; Iriedaily needs to assess the existence and functioning of internal grievane mechanisms systematically; it also needs to support and monitor ist functioning.
Iriedaily 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

The member values Fair Wear's approach to HRDD, which not only provides policies but also offers guidance on how to implement changes, supported by real-life examples. They find the learning tools provided by FW inspirational and helpful for understanding how to execute tasks effectively. In addition, Iriedaily appreciated the creation of a strong database to conduct HRDD and the peer-to-peer sessions organised to train members on how to use it.
Moreover, the brand appreciates that Fair Wear also takes 'smaller' brands into account as frontrunners.
Overall, the member is satisfied with the support and resources provided by FW, which help them in their CSR efforts.

# Brand Performance Check details

Date of Brand Performance Check: **02-07-2025**
Conducted by: **Gemma Giammattei**
Interviews with: Alex Haase - Accountancy Manager
Daniel Luger - CEO
Denise Graff - Brand Marketing Manager
Denise Schulze - Supply Chain Manager
Luis Luger - CSR Manager