

Monitored Party KM Nobely Garments Ltd.	amfori ID 050-000726-000	Address Zorun, Konabari, 1346 Gazipur, Dhaka, Bangladesh
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 03/09/2024	Closing Meeting Finished Date 04/09/2024	Submission Date 10/09/2024
Expiration Date 10/09/2026	Announcement Type Semi Announced	
Site KM Nobely Garments Ltd.	Site amfori ID 050-000726-002	

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OVERALL RATING



SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	B	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	A	
PA 6: Decent Working Hours	A	
PA 7: Occupational Health and Safety	A	

PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Imtiaz Khan, APSCA Membership No: CSCA 21701631

Name of team auditor:

Shawly Chowdhury, APSCA Membership No: CSCA 21701993

Md. Salif Zahed Chowdhury, APSCA Membership No: CSCA 21701467

Observers, translators, trainees, advisors/consultants: None

Monitoring partner name: TÜV Rheinland.

Audit schedule details: The audit team has conducted this audit in 02 days on September 03 & 04, 2024. Total 5 man-days are used for this audit; 4.5 man-days were allocated for onsite audit and 0.5 man-day were allocated offsite for reporting. 03 auditors were present on the 1st day of audit and 2 auditors were present on the 2nd day of audit to complete the audit.

Announcement Type: It was a semi-announced full audit.

Business partner information: "KM Nobely Garments Ltd." is a private Limited Company which was incorporated with RJSC on 05 April 1998. In factory license, factory name is given as K M Nobely Garments Limited but as per management, updated factory name is given in amfori BSCI platform (KM Nobely Garments Ltd.). This factory is 100% export-oriented Woven (Denim-bottom) manufacturing company. The factory begun its operation in 2013 and currently it is located at Zorun, Konabari, 1346 Gazipur, Bangladesh. The main production processes are Cutting> Sewing>Washing> Finishing (Pressing to Packing). The total land area is approx. 52,079.76 square feet. Fire license total coverage is 114,574 sq. ft. where production area is 95,500 sq. ft. and warehouse area are 16,425 sq. ft. and other area is 2,649 square feet. Production capacity of the facility is 45,60,000 pieces yearly as stated by management. As per facility management, production pressure was found same in all months in the facility.

Audited location information: This facility is located in their owned area. The license corresponds with the actual situation with respect to company address and the number of buildings in which it operates. There is only one factory in this premises where 04 Buildings and 01 shed and one container were found on the premises. Detail building description is given below:

Building-01

Ground Floor- Washing Section, Dryer section, Office, Childcare, Fire control panel board, Security post.

1st Floor- Finished Goods Store, Medical room, Office room, Conference room.

2nd Floor- Packing Area with C-TPAT Zone, Inspection room.

3rd Floor - Finishing section, Pressing area, Spot removing room, Quality section, Thread sucker area, Button attaching area.

4th Floor - Finishing section, Pressing area, Spot removing room, Quality section, Thread sucker area, Button attaching area.

Roof top – 100% free.

Building-02

Basement -Fire Pump room.

Ground Floor- Chemical Store.

1st Floor - Lab room, Wash Quality & Wash Finishing section.

2nd Floor - Dry Process, PP spray, grinding, tagging, grind scraping, Whisker.

3rd Floor – Raw material storage area.

4th Floor - Raw material storage area.

5th Floor - Dining & Canteen room.

Roof Top- 100% free.

Building-03- Chemical sub store, Sub-Station, Generator, Transformer, Boiler & Compressor Room.

Building-04- ETP area.

Shed-01-

Ground Floor- Fabric & accessories warehouse, Cutting Section, Cad Room, Bar tack section, Laser & Ozone Room.
1st Floor - Sewing section, Maintenance room, AGM room.

Beside this there is a container to keep wastage of factory in open area of facility premises.

Operating shifts and hours: Facility runs in one general shift which runs from 08:00 AM to 05:00 PM. 01-hour personal break is ensured to all employees from 01:00 PM to 02:00 PM and 1:30 PM to 2:30 PM in day shift and 01-hour personal break is ensured by rotation for the night shift employees. Friday is a weekly day off for all employees except security guards. In washing section, facility has two shifts which starts from 8:00 am to 5:00 pm and 8:00 pm to 5:00 am. In security section, facility has three shifts (6:00 am to 02:00 pm, 02:00 pm to 10:00 pm and 10:00 pm to 06:00 am). Rotation wise weekly day off is ensured for the security guards.

Time recording system: All employees working time are recorded through electronic time keeping system (face detection and finger punch).

Salary payment details: Facility considers calendar month as pay period & monthly salary is disbursed through banking system (Dutch Bangla Bank Limited) for workers. Last payment was made on August 08, 2024, for the month of July 2024. Facility has all fixed rated employees. No piece rated, hourly or weekly paid workers found during audit. Minimum wages of the facility are BDT 12,500 per month which is comply the updated Garments Minimum Wage Gazette.

Worker number information: At present, there are 1,975 employees inclusive of process workers, all management, administrative staffs, security guards and cleaner where 834 are male and 1141 are female. Among them, total number of production workers are 1665 where 561 are male production workers and 1104 are female production workers. Facility has total 26 security guards. Total 293 workers work in the night shift in security and washing section where 253 are male and 40 are female workers. 09 pregnant workers were found, and 13 workers were found in maternity leave during this audit. There was no foreign migrant, interns, disabled, young, seasonal, home-based workers found in the facility.

Good practices: 1. Facility reuses effluent treatment plant water for chemical dosing and vehicle cleaning.

Worker organization details: Facility has an elected participation committee. It was formed on 11 August 2024, complying all the legal requirements. There is total 18 members in participation committee where 07 from management side & 11 from worker's side. Last meeting was conducted on August 20, 2024. Different types of topics were discussed in the last PC meeting.

Circumstances: The management staff were open and cooperative during the audit. There was no special circumstance during the audit.

Summary of finding: Findings were detected in PA1, PA2, PA5 & PA7.

PA1: Incomplete management system in implementation and facility, did not identify all their business partners in their supply chain mapping and factory license was expired and applied to the concerned authority.

PA2: Facility did not have documented strategic plan to achieve long term goals and objectives, and gaps were identified in grievance mechanism system.

PA5: Living wage was not properly calculated and no proper action plan is taken for implementing living wage.

PA7: Gaps found in implementation of health & safety related legal requirements, no barred window in 1st to 3rd floor of Building-2, improper risk assessment for some areas, acid license expired, gaps were found in emergency response plan and root cause of injuries were not properly identified.

Living wage calculation: Auditors used Living Wage Update Report No. 23-04-36 published by Global Living Wage Coalition (GLWC) to estimate the standard cost of living in Gazipur, Bangladesh because there were some gaps in the facility's calculated living wage.

Attachments: Below documents & photos are not applicable for this factory:

1. Collective bargaining agreements (Collective bargaining agreement is not applicable).
2. Inconsistencies between time and production records.
3. Dormitories (There are no dormitories in the facility premises).
4. No foreign migrant worker.

Remarks: (i) Facility management were aware of the 'Speak for Change' based grievance mechanism program and displayed "Speak for Change" poster in the visible areas of facility. Still no training or awareness sessions had not been arranged for the employees. However, facility management have committed that they will take necessary actions as soon as possible.

SITE DETAILS

Site
KM Nobely Garments Ltd.

Site amfori ID
050-000726-002

GICS Classification

Sector Consumer Discretionary	Industry Group Consumer Durables & Apparel	Industry Textiles, Apparel & Luxury Goods
Sub Industry Apparel, Accessories & Luxury Goods		

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	1,892	Workers
Legal minimum wage in local currency	12,500	Monthly
Lowest wage paid for regular work at the site	12,500	Monthly
Calculated living wage in local currency	21,091	Monthly
Total sample	38	Workers

Other Metrics

Male workers	757	Workers
Female workers	1,135	Workers
Non-binary workers	0	Workers
Permanent workers - Male	834	Workers
Permanent workers - Female	1,141	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	16	Workers
Management - Female	0	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	96	Workers
Workers on probation - Female	144	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	253	Workers
Workers with night shift - Female	40	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	0	Workers
Domestic migrant workers - Female	0	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	834	Workers
Workers hired directly - Female	1,141	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	9	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	13	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	16	Workers
Sample - Female	22	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: KM Nobely Garments Ltd. | Site amfori ID: 050-000726-002

Question: 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH

Finding

(i) Through plant tour, documents review, worker & management interview it was noted that facility has developed social policy and procedure to implement amfori BSCI COC in its activities and assigned personnel for monitoring. However, gaps have been identified in Social Management System, Workers Involvement and Protection, Fair Remuneration and Occupational Health and Safety areas. [Reference: Requirement of amfori BSCI System Manual]

(ii) During the document review and management interview, it was noted that the factory license expired from July 01, 2024. However, factory management had applied for the renewal of the factory license and made the necessary payment on June 30, 2024, but the renewal process is still pending with the concerned authority. [Reference: Bangladesh Labour Rules 2015, Rule 355 (4) & 356 (2)]

This question is rated as partially because facility has updated other all legal licenses and applied for renewal for factory license.

Question: 1.3 Is there satisfactory evidence that the auditee has identified their significant business partners and their level of alignment with the amfori BSCI Code of Conduct?

ENGLISH

Finding

Based on documents review and management interview that facility did not include chemical supplier in their supply chain mapping. As a result, internal documents (e.g. grievance policy, anti-corruption policy, amfori BSCI COC etc.) were not communicated and internal monitoring system also not conducted in those missing supplier. Moreover, human rights policy is not communicated with the selected 10 suppliers yet. [Reference: Requirement of amfori BSCI System Manual] This question is rated as partial because facility has identified 10 supplier and communicated their internal documents with those suppliers.



PA 2: Workers Involvement and Protection

Site: KM Nobely Garments Ltd. | Site amfori ID: 050-000726-002

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH

Finding

Based on documents review and management interview that the facility management has set up the company's mission and vision, specific long-term goals or objectives. However, did not have documented

Finding

strategic plan to achieve long term goals and objectives. [Reference: Requirement of amfori BSCI System Manual]
This question is rated as partially because facility management has fulfilled the other requirements of this questionnaire.

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

Finding

Based on the review of grievance-related documents and management interviews, it was noted that the facility did not conduct a survey on the grievance mechanism in a confidential manner to verify whether the current grievance system is effective or ineffective. Additionally, the questionnaire used under the grievance mechanism survey was inadequate, as it only consisted of one question. [Reference: Requirement of amfori BSCI System Manual].
This question is rated as partial because facility has developed grievance policy and have grievance register.

PA 5: Fair Remuneration

Site: KM Nobely Garments Ltd. | Site amfori ID: 050-000726-002

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

Finding

During the verification of documents and interviews with workers, it was observed that the factory is providing salaries based on the legal minimum wage according to grade for the workers. Although the factory has collected various data to calculate the living wage for this region, it has not taken appropriate steps to calculate standard housing costs, education costs, etc. Consequently, the living wage was not properly calculated to identify the potential gap between the current local minimum wage and the living wage, and there is no action plan in place to address these gaps. [Reference: Requirement of amfori BSCI System Manual] This question is rated as partially because facility management has completed fair remuneration quick scan template for 20 sample workers and the factory has collected various data for calculating living wage for this region considering food cost, housing cost, education cost etc.

PA 7: Occupational Health and Safety

Site: KM Nobely Garments Ltd. | Site amfori ID: 050-000726-002

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

ENGLISH

Finding

- i) Based on documents review, management & worker interview it was noted that the facility is in the process of implementing health and safety-related legal requirements. However, several gaps were identified concerning barred window, risk assessment, acid license, emergency response plan, root cause of injury etc. [Reference: Requirement of amfori BSCI System Manual]
- ii) Based on plant tour it was found that facility did not install emergency rescue window (barred window) in the 1st to 3rd floor of building-2 to use in case of emergency. [Reference: Bangladesh Labor Rules- 2015, Rule-54(10)]
- This question is rated as partially because facility management has fulfilled the other requirements of this questionnaire.

Question: 7.3 Is there satisfactory evidence that the auditee set up an effective management system that ensures they regularly carry out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH

Finding

Through plant tour, document review & management interview following risk assessment related issues were noted during audit-

- i) Facility does not analyze safety risks that may be associated with working near exhaust fan. Note that during plant tour some workers of pressing section were found working adjacent with exhaust fan at 3rd & 4th floor of building-01.
- ii) Facility has done risk assessment for boiler but after reviewing the document it was noted that some risk associated with safety valve, chemical dosing, maintenance was not assessed.
- iii) Factory has conducted risk assessment for the dining area, but it overlooked key risks such as food contamination, waste management, pest infestation, and overcrowding.
- iv) The factory has conducted a risk assessment regarding the storage of goods at excessive heights and near electrical lights on the production floor, as well as an ergonomics risk assessment. However, no administrative or engineering controls have been implemented to mitigate these risks. During the plant tour, goods (cartons, semi-finished garments) were observed stored at excessive heights and close to electrical lights on the ground floor in bar tack section of Shed-01 and the 3rd floor of finishing section of Building-01. Additionally, all sewing machine operators were found sitting on tools without back support. As a result, workers may feel uncomfortable, which could affect their spines, given that they work 8 to 10 hours per day. [Reference: Bangladesh Labour Rules 2015, Schedule 4(2) B (1)]
- This question is rated as partially because facility management conduct risk assessment for other area e.g., cutting section, sewing section etc. and posted relevant risk assessment at production area.

Question: 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

ENGLISH

Finding

During the document review and management interview it was note that acid license of the facility has been expired from 01 July 2024. However, facility has already applied to the concern authority on 23 May 2024 for renewal of the license. [Reference: Acid (Import, Production, Storage, Transport, Sales & Use)]

Finding

Control Rules 2004, Rule 26 (1)]

This question is rated as partially because facility has applied for renewal for acid license.

Question: 7.8 Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures?

ENGLISH

Finding

Based on the emergency response plan and procedures, as well as interviews with emergency personnel responsible, it was noted that floor-wise and shift-wise emergency teams were not formed to effectively handle different emergency crisis scenarios. Additionally some emergency scenarios like boiler explosion, malfunction (e.g. air pollution control equipment, wastewater treatment plant) and contagious diseases were not included in the emergency response plan. [Reference: Requirement of amfori BSCI System Manual]

This question is rated as partial because facility has response plan and procedure for some areas like fire, unrest, chemical spillage etc.

Question: 7.10 Is there satisfactory evidence that the auditee has and properly uses procedures and systems for reporting and recording occupational accidents and injuries?

ENGLISH

Finding

Based on the injury register, analysis, investigation records, it was found that the root causes of each injury that occurred in the facility were not properly identified. As a result, a proper corrective action plan was not effectively implemented to reduce the re-occurrence of accidents and injuries. [Reference: Requirement of amfori BSCI System Manual]

This question is rated as partial because facility has recorded all types of injury in the facility and have emergency team to treat the injuries occurred in the facility.