

Dear Isobel

Apologies for the delay, please find below our response. Please let me know if anything is needed.

Thank you

1. Please complete the below table with information on the recruitment agencies and labour suppliers used by yourself and business partners in Qatar throughout 2022. If you no longer use a particular agency or supply, please state why the contract/ business association was ended.

As one of our main strategies to lower the risk of unethical recruitment, Four Seasons Doha uses direct recruitment as much as possible, In 2022, Four Seasons Hotel Doha hired approximately 230 team members, with only 21 hired through to the support of recruitment agencies in Ukraine, South Africa, and Argentina. The rest were hired directly through our own recruitment processes.

2. Please disclose any due diligence process your company undertook to detect recruitment-fee payment ahead of and during the Qatar World Cup.

Leading up to the World Cup, the Hotel passed all Supreme Committee audits. Four Seasons Doha requires all partners to sign its mandatory recruitment standard (example attached). Additionally, candidates are informed prior to onboarding to not pay any recruitment fees and are required to confirm this upon arrival by signing a confirmation form. Four Seasons Hotel Doha adheres to the [Four Seasons Human Rights Policy](#).

3. How many instances (and as a percentage of your workforce in Qatar) of recruitment fees paid by workers in Qatar did your due diligence process uncover in 2022, how much in USD (if any) was paid back to workers, and how much was paid back within six months of the risks being identified?

No instances uncovered.



Four Seasons Doha's Mandatory Standards for Recruitment Agencies

Objective:

The purpose of these Standards is to set forth minimum mandatory requirements with respect to fair recruitment principles required to be implemented by Recruitment Agencies. These Standards aim to reinforce Hotel's commitment to improving the quality of recruitment according to the national legislation, the International Tourism Partnership's Principles on Forced Labor and the ILO Fair Recruitment principles and operational guidelines.

Key Relevant Qatar Legislation:

Qatar Labor Law – Law No. 14 of 2004

Ministerial Decision No. 8 of 2005 Regarding the Conditions and Procedures for Obtaining a License to Recruit Foreign Workers for Others

Definitions:

First Party: (Four Seasons Hotel Doha, The Corniche, PO Box 24665, Doha, Qatar), legal entity signing contract with the second party.

Recruitment Fees and Related Costs: Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement. This includes the service fee to the recruitment agency, medical tests costs, insurance costs during recruitment, costs for skills and qualifications tests, costs for training and pre-departure orientation, travel costs, and administrative costs in countries of origin that are required for the recruitment process, visa costs, passport creation, work and residence permit costs

Local Recruitment Agency Means any, natural person or legal entity licensed as a recruitment agency by Qatar's Ministry of Administrative Development, labor and Social Affairs, which acts as an intermediary for the purpose of recruiting a Worker for an Employer in Qatar

Overseas Recruitment Agency Means and includes any natural person or legal entity registered or licensed by the Government of the country of origin which acts as an intermediary for the purpose of recruiting a Worker for an Employer in Qatar

Designated Personnel Any person designated by First Party to oversee the compliance with the Standards

Second Party: the Company that signs the agreement / contract with the First Party, i.e Local Recruitment Agency, Overseas Recruitment Agency.

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Workers: potential workers that are being screened, interviewed and selected and placed by the Recruitment Agency

Recruitment Agencies

Second Party (The Recruitment Agency "PHRS Hospitality Experts LLC,") is committed to follow the following standards:

The Recruitment Agency "PHRS Hospitality Experts LLC"
2204 Quail Roost Dr, Weston, FL, 33327, US

1. The First Party should conduct pre-selection and periodic audits of the local Recruitment Agency, based on national legislation and international fair recruitment standards.
2. The local and overseas Recruitment Agencies should have in place written **policies and procedures** regarding the prevention of forced labor and child labor, and the **commitment to fair recruitment**.
3. Workers shall **not be charged any recruitment fees and related costs** for the recruitment.
4. The **job advertisements from local recruitment agency or overseas recruitment agency shall include the statement that no fees and related costs shall be charged to job-seekers** at any phase in the recruitment, selection, and hiring or deployment process.
5. Workers should be provided **in advance with a written and detailed employment offer** or contract in their language, including all working and living conditions, the location and requirements and tasks of the job in line with Qatar's Labour Law.
6. Workers shall **not be required to sign a contract different than their Original Offer of Employment** received in their country of origin.
7. Workers shall not be asked by local recruitment agency or overseas recruitment agency to participate in any form of **bond / deposit** in order to pay off recruitment fees and related costs or retain his/her identity documents.
8. The local recruitment agency should conduct an **adequate human rights due diligence of the potential overseas partners recruitment agency**, as a pre-selection process.

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9. The local recruitment agency shall sign an agreement with the overseas recruitment agency specifying among others that workers recruited should not pay any fees or related costs for their recruitment. This contract should also specify the service fee paid by the local recruitment agency to the overseas recruitment agency for their services. The First Party could ask a copy of this agreement at any time.
10. The local recruitment agency should only enter into agreement with a recruitment agency that is registered or licensed by the competent authority of the country of origin and is not blacklisted
11. The local recruitment agency should conduct periodic audits of the overseas recruitment agency to ensure that the terms and conditions of their agreement are met. Those audits should include an assessment of the due diligence mechanism that the overseas recruitment agency has put in place to ensure that any sub-agents do not collect any fees or related costs to job-seekers.
12. The local and overseas recruitment agencies should provide a comprehensive pre-departure and post-arrival orientation to workers recruited and produce leaflets on rights and responsibilities at work in Qatar.
13. The local and overseas recruitment agencies should establish grievance policy and procedures in case of alleged abuse of workers' rights in the recruitment process, without any retaliation to the complainant.
14. These Standards shall constitute a part of the Main Contract.
15. Should the Second Party at any point during the duration of the contract does not meet and / or comply with the standards, the First Party has the right to break the contract and discontinue the business relationship without any notice period.

Name: Mr Carlos Manuel Diaz

Company: - PHRS Hospitality Experts LL

Position :- Owner

Signature

A handwritten signature in black ink, appearing to read "Carlos M. Diaz", written over a large, stylized flourish.

