

**2018 Questions for Construction Companies in Qatar**  
***Migrant Worker Rights***

Name of company: AKTOR Qatar W.L.L.

Headquarters address: New Salata Complex, D Ring Road, Building No 258, Zone 40, Street 250,  
Doha, Qatar

Website: <http://en.ellaktor.gr/>

1)

- a) Please describe the scope of your company's operations in Qatar, including reference to the company's current projects and any labour rights standards governing these projects.

**Answer:**

AKTOR Qatar WLL is one of the leading construction companies with operations mainly in the Middle East, Greece and Eastern Europe. It primarily engages in the construction of large-scale accommodation, commercial and infrastructure projects as well as the provision of facility management services for government entities and high profile private clients.

AKTOR Qatar WLL (hereinafter referred to as "AKTOR") is currently involved in the following projects:

1. CP 25 - Backup Approach & Training Centre for Hamad International Airport
2. CP 94 - Building of General Services Equipment Maintenance Facility & Transportation for Hamad International Airport
3. Facility Maintenance Management Services For The Aircraft Maintenance Hanger Complex, Amiri Hanger Qatar Duty Free, Inflight Duty Free, Consolidated Car Rental Facility and Airport Staff Access Facility at the Hamad International Airport
4. ALYSJ - JV (Metro) Design & Build Package 3 - Gold Line Underground for Qatar Rail
5. ISF Development of ISF Camp - Al Duhail for Qatar Internal Security Forces
6. New Integrated Training Center- New Simulation Building for Hamad International Airport

AKTOR activities in Qatar are governed by the following laws, standards and internal policies:

- Qatar Labour Law
- Qatar Construction Standards (QCS) 2014
- OHSAS 18001 Occupational Health and Safety
- Qatar Foundation Mandatory Standards
- All laws, regulations and standards applicable in the state of Qatar

- b) List your company's business relationships on its current projects, including with business partners<sup>1</sup> and entities in its contracting chain.<sup>2</sup> If your company maintains this information publicly, please provide a link or attachment to it.

**Answer:**

Information with regard to AKTOR business partners, including clients, subcontractors, suppliers and manpower suppliers is provided in the following enclosed documents.



AKTOR Joint  
Venture Partners.pdf



AKTOR Clients.pdf



List of  
Subcontractors.pdf



List of Workers'  
Suppliers.pdf

- 2) Does your company maintain public workforce data? If yes, please provide a link or attachment with the data.

If not, please provide the information on the number of:

- a. Directly employed<sup>3</sup> workers on your current projects, and their countries of origin

**Answer:**

AKTOR workforce data can be found via the Ministry of Labour. AKTOR is submitting workers' salary report on a monthly basis through Wage Protection System to the Labour Ministry.

In total, AKTOR has 3,927 directly employed workers in its' current projects. Please find enclosed file with the list of nationalities for further details.



AKTOR Workers as  
per Nationality.pdf

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<sup>1</sup> i.e. joint venture partners, State and non-State clients, and State and non-State project financiers

<sup>2</sup> i.e. subcontractors, recruitment agencies, and labour supply companies in countries of origin and destination

<sup>3</sup> A directly employed worker is a worker with whom you have a contract of employment and to whom you pay wages

- b. Workers employed by subcontractors on your current projects

**Answer:**

Total count: 4,665 workers

- c. Workers employed by labour supply companies on your current projects

**Answer:**

Total count: 5,890 workers

### **Human rights policy & due diligence**

- 3) Does your company have a publicly-available written policy to respect human rights in its operations that addresses a) the rights of workers employed by the company and b) the rights of workers employed by subcontractors, labour supply companies and other entities in the company's subcontracting chain? Please provide links or attachments to the company's relevant policies.

**Answer:**

AKTOR QATAR WLL is a member of Ellaktor Group. It has a publicly available written policy on Human Rights and Corporate Social Responsibility. Operations in State of Qatar are driven by the company's Integrated Management System policy, one of main focuses is of which is "Human Development" in line with the Qatar National Vision 2030. Relevant links can be found below:

Links:-

[http://www.aktor.gr/corporate\\_social\\_responsibility](http://www.aktor.gr/corporate_social_responsibility)

[http://www.aktor.gr/total\\_quality\\_management](http://www.aktor.gr/total_quality_management)

[http://www.aktor.gr/health\\_safety](http://www.aktor.gr/health_safety)

- 4) Does your company require subcontractors and other entities in your contracting chain in Qatar to comply with your human rights and other rights-related policies and procedures? If yes:
- a) How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?

**Answer:**

AKTOR's endeavour is to always create partnerships with organizations which share the same values and actively demonstrate that they show respect for their employees and abide by human rights principles. AKTOR further ensures that these principles are carried forward into the service delivery process by incorporating in its contracts clauses which oblige its supply chain to comply with all laws and regulations applicable in the State of Qatar, including the labour law. AKTOR also ensures to include provisions in subcontract

agreements which call for final payments are effected to subcontractors only after they provide written undertaking that they have paid their employees.

Further to the above, during the works, in line with -AKTOR's Quality Assurance-, all activities are continually monitored for compliance and, if necessary corrective measures taken for any non-conformities. In particular the Quality and Assurance of Health & Safety departments of AKTOR Qatar ensures to undertake the following:

- Ensure that the company's operations comply with legal and regulatory standards
- Assess subcontractor, supplier and partner compliance
- Track any change that may occur in the applicable Health & Safety legislation, in order to adjust company activities
- Maintain a cordial and collaborative relationships with the competent agencies

b) Do you enforce compliance beyond the first-tier of your contracting chain? What challenges does the company face in ensuring subcontractor compliance, both in the first and subsequent tiers?

**Answer:**

AKTOR collaborates with licensed subcontractors and manpower suppliers only. The company enforces compliance of the contract drawn, agreed and signed by both parties which is governed by Qatar Labour Law. Irreparable violation of contracts may lead to repudiation and cancellation of agreement.

The company is maintaining cooperation and mutual understanding to all interested parties. If solution can be obtained through good relationship, then this will be the first option. The link below best describe this relationship:-

[http://www.aktor.gr/relationships with interested parties/](http://www.aktor.gr/relationships_with_interested_parties/)

## Recruitment

5) Please describe your company's process for recruiting migrant workers to be part of your directly employed workforce in Qatar.

**Answer:**

Please find enclosed file of Company's recruitment procedure and other relevant procedures. Additionally, you can find below a summary for your convenience.



Recruitment  
Procedure.pdf

## **Recruitment**

1. LOCAL - HR Department and Department Heads go through direct screening of applicants to select the appropriate profiles for the existing vacancies. The process is described below:-

Manpower Requirement - is the outcome of the workload analysis of the Company.

Sourcing - the HR department works on sourcing and shortlisting of resumes from Data Base, consultants, agents and advertisements in local sites and newspapers.

Interview & Selection - Candidates who are short listed are informed through email or telephone by HR department to attend an interview. This may include a single face to face interview, a Skype interview or both. Interviews are combined with trade tests if so required. Joining documents and information will be screened at this stage.

Pre-arrival Procedure - Upon finalization of the candidate, the HR Department will prepare the Intention of Offer and Appointment Letter signed by the company and candidate for his/her personal file.

Employee Arrival - HR Department collects and forwards all necessary documents to Administration Department for joining formalities and filing.

Work Assignment - Endorsement of the employee by HR Department to the respective Department Heads to commence working.

2. OVERSEAS CAMPAIGNS - Whenever there is a need for large numbers of employees to be signed on without the mediation of an agent, the Company organizes overseas recruitment campaigns. The recruitment trips are organized based on VISAs availability at the moment decided. Block of VISAs for specific nationalities is advised to the Company by the State of Qatar after application to the Ministry of Labor. Specific formalities predetermine the Company's recruitment destinations despite Company's preferences. The process is as follows:-

### **Recruitment Campaign preparation**

Company requests approval from:

1. Qatar Chamber of Commerce in Qatar
2. Ministry of Foreign Affairs in Qatar
3. Embassy of the country where interviews will be conducted

An authorized agency is arranging the advertisements and training centers in host country to attract and select candidates. Human Resources and Technical representatives of AKTOR attend and conduct the interviews for selection. With every campaign AKTOR dispatches at the very least one representative who is fluent in the local language.

#### Selection / Interview

Candidates are assessed on their technical expertise and experience. Salary contracts are based on ability and seniority and follow the rates decided by Labor department for each country. Contracts are signed in both English and the candidate's native language.

#### Arrival

The authorized agency is obliged to provide the complete list of the selected candidates medically screened in their home country in order to meet the relevant medical requirements in Qatar. The Company is arranging medical tests in private hospitals/clinics upon client's contract requirements apart from the obligatory ones by the State of Qatar. Medical Insurance or Hamad Health Card (Qatar National Health System) is provided to all employees.

Upon the medical record proven fit, visa application is submitted and issued in approximately 3-7 working days. The visa is forwarded to the authorized agency in order to get approval from the hosted country and complete local formalities. Flights are booked by the Company for workers once their travel date is confirmed.

New arrivals are met at the airport and taken through the orientation basics at their accommodation. Health and Safety inductions are site-specific and take place once the new worker is assigned to a project. The New Employee Orientation Induction of the Company and Camp manual files are found enclosed for details:



New Employee  
Orientation Inductio



Employees  
Accommodation.pdf

### 3. MANPOWER SUPPLY AGENCIES

In cases of workers' instant utilization, the Company enters in agreements with registered manpower supply agencies based in Qatar. This is merely a temporary way to fill urgent vacancies while the Company is in the process for permanent recruitment solution. Also, this option is preferable in the case of short time manpower requirements. In such cases, the process is described below:

Project heads are forwarding manpower requirements to HR Department with information about numbers, trades, duration, etc.

HR Department will liaise with manpower suppliers about the requirements and rate quotations taking into consideration the lowest rates, previous employees' performance, market rates etc.

After negotiating the rates, HR Department will prepare the rate confirmation document (LPO) to be signed by respective authorized signatories and requests for Trade Tests or interviews, if necessary.

HR Department is collecting the suppliers' list of workers with information and proper documentation e.g. passports & Qatari ID copies for formalities and gate pass arrangements.

Contract preparation is done by HR Department and suppliers are arranging the attestation to the Chamber of Commerce in Qatar.

Once finalized, the mobilization of workers will set forth. Joined Memo is forwarded by the project timekeeper, signed by the respective authorized personnel for Payroll system update.

- 6) Does your company have a publicly-available written policy to respect migrant workers' rights that addresses the specific risks migrant workers face during recruitment? Please provide links or attachments to the company's relevant policies.

**Answer:**

AKTOR has a publicly available commitment to social responsibility, link can be found below. In addition, the operations in Qatar are driven by our Integrated Management System policy, which deals with "Human Development" as one of its four pillars, similarly to the Qatar National Vision 2030.

Link:-

[http://www.aktor.gr/corporate\\_social\\_responsibility](http://www.aktor.gr/corporate_social_responsibility)

- a) How does your company prevent the practice of contract substitution? Does your company have a policy of honoring the terms of contract signed in workers' home countries?

**Answer:**

Contracts are processed via MOI (Ministry of Interior- Labour Department) and attested by respective embassies. The same contracts will be followed once the workers are deployed in Qatar. AKTOR contracts are protected by Qatar Labour Law as follows:

Article (34)

The recruitment of workers from abroad for others shall be made in accordance with a written contract between the licensed person and the employer in accordance with a model to be determined by a decision of the Minister.

The task of the licensed person shall be considered to have been completed immediately on the arrival of the workers and their delivery to the employer without prejudice to the obligations specified in the recruitment contract.

Article (35)

The person licensed to recruit workers from abroad shall be subject to the supervision of the Ministry and shall keep in the office the particulars, registers and other documents which shall be specified by a Decision of the Minister.

Article (36)

The procedures of licensing the recruitment and the rules and conditions of the works of the offices of recruitment of workers from abroad for other shall be determined by a decision of the Minister.

b) If your company has a policy of no-fee recruitment, what steps does it take to ensure workers do not pay recruitment fees and related costs?

**Answer:**

It is a legal requirement to recruit via a recruiting agent, the legal entity approved and required by most host governments. The Company is demanding from the recruiting agencies not to charge candidates any recruitment or placement fees and takes steps during the recruitments campaigns and upon workers arrival in Qatar to ensure this was upheld. Steps mainly include enquiries to the candidates regarding the charging or not of such fees. Should the Company become aware of such fees then the charging agencies are no longer selected and reported at the same time.

The Company is following Qatar Labour Law Article 33 which states that:-

“The person who is licensed to recruit workers from abroad for others shall be prohibited from doing the following:

1. To receive from the worker any sums representing recruitment fees or expenses or any other costs.
2. To carry out in the office any other business other than the recruitment of workers from abroad for others.”

We are not aware of our workers having paid fees in their home state.



The Company will discontinue the cooperation with the recruitment agency found guilty for illegal fees charging and the agency will be penalized based in the below Qatar Labour Law Article 145, which states:

“Whoever violates the provisions of Articles 29, 33, 86, 87, 88, 89, 90, 93, 94, 103, 104, 105,108,122 and 133 of this law shall be penalized with imprisonment for a period not exceeding one month and with a fine of not less than two thousand Riyals and not exceed six thousand Riyals or with any of these two penalties.

And in the violations relating to the recruitment of workers from abroad for the account of third parties the court may in addition to the penalties provided for in the preceding paragraph order the closure of the office and the cancellation of the license.”

c) If your company has a policy of reimbursing fees, please describe the company’s process for identifying incidences of worker-paid fees and reimbursing fees to workers.

**Answer:**

AKTOR Qatar doesn’t have reimbursement policy. There should be no fees to be collected based on Article 33 of Qatar Labour Law as mentioned above.

d) How do these policies apply to the recruitment agents you engage and to labour suppliers and subcontractors who have workers on your projects?

**Answer:**

AKTOR policies are included in the clauses of Contracts and Agreements made between license recruitment agencies, suppliers and subcontractors. These Contracts and Agreements are governed by the following Qatar laws, standards and internal policies:

- Qatar Labour Law
- Qatar Construction Standards (QCS) 2014
- OHSAS 18001 Occupational Health and Safety
- Qatar Foundation Mandatory Standards

Through AKTOR’s Quality Assurance, all activities are continually monitored for compliance and, if necessary corrective measures taken for any non-conformities. Irreparable violation of Contracts may lead to cancellation of agreement.

### **Payment & wages**

7) What is your company’s process for determining the wages of its workers in Qatar, and what external benchmarks does it use to set wage levels? Does your company consider a living wage in setting its wage amounts? Please explain.

**Answer:**

AKTOR follows the wage level set by migrants' embassies for their workers. We also subscribe to legitimate market surveys done by recognized Consultants in Qatar and other Gulf states to identify market rates.

8) Does your company operate on a contractual "pay when paid" basis in relation to:

a) Subcontractors?

**Answer:**

AKTOR doesn't operate on a contractual "pay when paid" basis to subcontractors. The company pay when the invoice is due based on contract agreed payment terms. AKTOR clients tend to pay on time and AKTOR uses the same with its subcontractors. Therefore "pay when paid" or "back-to-back" subcontract terms have not been necessary and generally we do not use them.

b) Employee wages?

**Answer:**

AKTOR maintains a reserve fund to meet salary obligations to workers at all times. The Wage Protection System applies to all and this needs to be followed (refer to no. 9 answer below for details of the WPS Law).

c) Other creditors? Please specify.

**Answer:**

AKTOR always strive to meet payment in strict accordance with the agreed contract terms.

9) What mechanisms does your company have in place to detect unpaid wages to workers on your projects? Does your company maintain reserves to ensure salary commitments can be met, and has the company ever intervened to pay workers' wages when the direct employer has defaulted or gone into liquidation? Please describe.

**Answer:**

Qatar has a Wage Protection System (WPS) that ensures workers to receive their salaries through an electronic salary transfer system which allows companies and institutions to pay employees via banks which have been approved and authorized to provide the service. The system has been developed by the Qatar Central Bank. It allows the Ministry of Administrative Development, Labor and Social Affairs (MADLSA) to maintain a database that records wage payments in the private sector, and guarantees payments are made in full and on-time. The WPS includes all institutions and companies registered with the Ministry across all sectors and industries.

## Freedom of movement

- 10) How does your company ensure that all workers on its project sites have free and secure access to their passports and identity documents, including workers employed by subcontractors and labour-supply companies?

**Answer:**

The right of workers to retain their own passports and identity documents are governed by Law 4/2009 that states:

“The Law 4/2009 regulates the entry, exit and residency of the country’s foreign workers (expatriates) and it gives adequate protection to the foreigners and guarantees their right to keep passports in their possession.

Violation of the law could amount to a penalty of not less than QR10,000 to the sponsor or his representative for every passports that he keeps in his illegal custody. Article 52 of Law 4/2009 has provisions for imposing fine on sponsors for the violations pertaining to the employees’ passports. A passport is a personal document of an individual and there is no reason whatsoever under normal circumstances for his sponsor or employer to retain the same. Only in exceptional circumstances a sponsor has the right to keep the employee’s passport.

Under Article 9 of Law 4/2009, a sponsor is bound to return the passport of his employee after finalizing the residence formalities and after applying for renewal thereof.

AKTOR is in compliance with the mentioned law and ensures that the licensed recruitment agencies, suppliers and subcontractors it collaborates with also comply with the same. Through AKTOR’s Quality Assurance, all activities are continually monitored for compliance and, if necessary, corrective measures taken for any non-conformities. Irreparable violation of Contracts may lead to cancellation of agreement.

- 11) How does your company ensure that all workers on its project sites have valid work permits and other documents required for employment, including workers employed by subcontractors and labour-supply companies? Please include information on who pays for work permits and what steps the company takes when employers on its projects fail to issue or renew workers’ permits.

**Answer:**

QATAR Law requires all expats to hold either a valid RP (Residence Permit) or visa while in Qatar. Residents are required to carry ID with them at all times.

Article 6 of Law 4 of 2009, which regulates expats’ sponsorship and residence rules, does state that all residents should submit proof of residence or visa when required by the

authorities. Article 52 of the same law applies a maximum QR10,000 fine for those who cannot present their IDs.

AKTOR maintains a Data Alert System that will prompt the responsible personnel to renew the workers visa 30 days before its expiry date. The company bears the cost of residence permits and ensures that all workers have valid residence permits at all times.

AKTOR is in compliance with the mentioned law and ensures that the licensed recruitment agencies, suppliers and subcontractors it collaborates with also comply with the same. Through AKTOR's Quality Assurance, all activities are continually monitored for compliance and, if necessary, corrective measures taken for any non-conformities. Irreparable violation of Contracts may lead to cancellation of agreement.

12) How does your company ensure all workers on its projects are free to change jobs and/or leave Qatar at will?

**Answer:**

Article 22 of Law 4 of 2009, which regulates expatriates Entry, Departure, Residence & sponsorship rules states that the competent authority may transfer the sponsorship of an employee who is an Expatriate to another employer under a written agreement between the new and former employers and with the approval of the competent authority of the Ministry of Labour, taking account of the categories subject to the provisions of the Labour Law. Where sponsorship is transferred, the new sponsor shall replace the former sponsor as regards all obligations. The sponsorship of the former sponsor shall expire and he shall be held harmless with respect to the obligations resulting therefrom.

AKTOR is allowing workers to transfer employers within the country. Workers who have joined Aktor with release/transfer/NOC papers from previous employer, they will be granted the same in case they have decided to join another employer. For workers who are hired from Country of Origin, this will be on AKTOR's discretion to provide release/NOC papers with most cases to be granted this right.

Aktor is adhering to Qatar Labour Law Article 57 which states:

“Upon termination of the service of the worker the employer shall at his cost return him to the place from where he has recruited him at the commencement of the engagement or to any place agreed upon between the parties.

The employer shall complete the proceedings of returning the non-Qatari worker within a period not exceeding two weeks from the expiry date of the contract. If the worker joins another employer before his departure from the State the obligation to return him to his country or other place shifts to the latter employer.”

## Living conditions

13) How does your company ensure safe and decent accommodation for all workers on its project sites, including workers employed by subcontractors and labour-supply companies? Please include information on what steps the company takes when employers on its projects fail to house workers in adequate living conditions.

### Answer:

Aktor Qatar accommodation is in Labour Camp- Asian Town. It's a brand new workers accommodation with facilities and amenities described by the latest Qatar Foundation Standards (2013) which is over and above Qatar Labour Law Standards. AKTOR Workers Accommodation details is found in the enclosed file below.



AKTOR Workers  
Accommodation.pdf

Qatar Labour Law protects this provision in Article (106) which states that employers employing workers in locations distant from the cities and to which the usual means of transportation are not available shall provide them with the following services:

1. Suitable means of transportation or suitable accommodation or both
2. Potable water
3. Suitable foodstuff or the means of obtaining thereof

The said locations are specified by a Decision of the Minister. Article (107). The employer employing fifty workers or more shall provide - them with the social services to be specified by a Decision of the Minister - taking into consideration the location of the work, the circumstances thereof and the number of the workers in the establishment.

AKTOR is in compliance with the mentioned law and ensures that the licensed recruitment agencies, suppliers and subcontractors it collaborates with also comply with the same. Through AKTOR's Quality Assurance, all activities are continually monitored for compliance and, if necessary, corrective measures taken for any non-conformities. Irreparable violation of Contracts may lead to cancellation of agreement.

14) Please describe how your company makes provision for workers to have access to:

- a) Safe and adequate nutrition

**Answer:**

AKTOR Qatar provides to its workers three fresh meals on a daily basis. The company is aware of the importance of employees' wellbeing most important element of which is nutrition, hygiene and health in general. Provision of hygienic and balance food diet to all employees is of utmost importance. Please find enclosed files of sample food menu for further details:



AKTOR Arabic  
Workers Menu.pdf



AKTOR Asian  
Workers Menu.pdf



AKTOR Filipino  
Workers Menu.pdf

b) Healthcare

**Answer:**

All AKTOR workers are provided with Hamad Medical Cards for their medical needs.

The Company reimburses medicine costs prescribed by physicians in Doha.

Apart from permanent first aiders, medical practitioners are visiting workers accommodation every week for medical check-ups, consultations and/or any health related concerns from workers.

Additionally, HSE Officers, first aiders and licenced nurses are present at sites during working hours.

c) Banking and remittance services

**Answer:**

All AKTOR workers have bank account with any local banks of preference in order to receive their remittance. The same is also provided by Qatar Wage Protection System. The company assists all employees in the opening of bank accounts and recommend banks based on availability of a bank representative and level of service. The bank representative approaches the employee and serves as a very helpful point of contact for any banking issues such as bank statements, personal loan applications, etc.

d) Transportation

**Answer:**

Several parameters in Qatar such as extreme weather conditions, especially in summer, shortage of taxis, limited public transport services and heavy traffic make transportation an important aspect in the Company's employee's everyday life. For this reason, the Company has its own fleet of vehicles and offers its employees a variety of options with regards to transportation. All staff level employees of the Company in the Head Office and in Project sites have transportation allowances or company provided vehicle. Workers are always transported from their accommodation facilities to work and backwards by Company's owned buses which are all air-conditioned.

e) Leisure activities

Workers Camp- Asian Town is a high standard accommodation designed with facilities for sports and leisure activities. Shopping Malls are also present in the area. Workers have recreational facilities should they need to unwind or relax after a tiring day or workweek.

**Health and safety**

15) Please describe your company's health & safety policy and procedures, including what steps the company takes to ensure that they are applied to directly employed and subcontracted workers on your projects.

**Answer:**

AKTOR activities in Qatar are governed by the following laws, standards and internal policies:-

- a) Qatar Labour Law
- b) Qatar Construction Standards (QCS) 2014
- c) OHSAS 18001 Occupational Health and Safety
- d) Qatar Foundation Mandatory Standards
- e) AKTOR Sustainability Report
  
- f) AKTOR Qatar Integrated Management System Policy Statement  
Link: [http://www.aktor.gr/total\\_quality\\_management](http://www.aktor.gr/total_quality_management)
  
- g) AKTOR Qatar Health and Safety manual  
Link: [http://www.aktor.gr/health\\_safety](http://www.aktor.gr/health_safety)

Through AKTOR's Quality Assurance, the activities are continually monitored for compliance and, if necessary corrective measures taken for any non-conformities. In particular the Quality and Assurance and Health & Safety departments of AKTOR Qatar ensure undertake the following:

- Ensure that the company's operations comply with legal and regulatory standards
- Assess subcontractor, supplier and partner compliance
- Track any change that may occur in the applicable Health & Safety legislation, in order to adjust company activities
- Maintain a cordial and collaborative relationships with the competent agencies

16) What is your company's policy and procedures on overtime? Please include in your answer:

- What the maximum/limit is on the amount of overtime

**Answer:**

AKTOR Qatar strictly adheres to Qatar Labour Law that states:-

Article (74)

The workers may be required to work additional hours to the working hours specified in the preceding article provided that the actual working hours per day shall not exceed ten hours unless the work is necessary for the prevention of gross loss or dangerous accident or for the repair or alleviation of the consequences of the said loss or accident.

The employer shall pay to the worker for the additional working hours the rate of not less than the basic wage plus not less than 25% thereof.

The workers who work between 9pm and 6am shall be paid the basic wage plus not less than 50% thereof with the exception of the shift workers.

Article (75)

The worker shall be allowed of a weekly paid rest which shall not be less than twenty-four consecutive hours and Friday shall be the weekly rest day for all workers with the exception of the shift workers. If the circumstances of the work necessitate the employment of the worker during the rest day the worker shall be compensated for the rest day by another day, and shall be paid

for working that day the wage payable to him for the ordinary weekly rest day or his basic wage plus an increase of not less than 150%.

With the exception of shift workers a worker shall not be required to work more than two consecutive Fridays

Wage Protection system set the maximum overtime hours per month to 85 hours only. There is no limit for payment of the overtime amount.

- Whether overtime work is voluntary

**Answer:**

Overtime is **voluntary**. In case project site requires workers to work beyond normal working hours, then overtime will applies as mentioned above.



- What the premium is for overtime work

**Answer:**

As per stated in Qatar Labour Law Articles (74) & (75) as above. Below is summary for your convenience:-

1.25% of basic on normal day for each hour after 8 hours & 1.5% of basic on public holidays for the whole working hours.

- How the company prevents all workers on its projects from exceeding overtime limits during peaks in construction activity

**Answer:**

Information about WPS limitation regarding overtime regulation has been properly communicated to project management and if there is any emergency situation to do overtime, then extra payment will be provided to the employees.

- 17) What steps does the company take to protect all workers on its projects from high temperatures, humidity and sunlight throughout the year? Please include information on how you monitor heat risk and how you communicate protective measures to all workers.

**Answer:**

Aktor is in compliance with The Ministry of Labour and Social Affairs (MOLSA) Ministerial Decree No 16 of 2007 aimed at protecting those working in open areas during the summer. According to the guidelines, working hours in the morning session cannot exceed five hours or go beyond 11.30am. In the afternoon session, work cannot start before 3pm.

Aktor, through memorandum, is notifying all workers and displaying/posting memos with time-tables of working hours in visible places like Bulletin boards in the accommodation and worksites.

- 18) Does your company maintain public data on fatalities and injuries to workers on its projects? If yes, please provide a link or attachment with the data. If not, please provide information for 2016 and 2017 on the total number and the causes of:

- a) Work-place fatalities in your direct and subcontracted workforce

**Answer:**

There have been no work-place fatalities since the company began operations in Qatar in 2004, same for the subcontracted workforce.

- b) Permanent disabilities in your direct and subcontracted workforce

**Answer:**

There have been no accident of this magnitude that leads to permanent disabilities of workers since the company began operations in Qatar in 2004.

c) Lost-time injuries in your direct and subcontracted workforce <sup>4</sup>

**Answer:**

There is no serious injuries that we can consider as lost-time for the past two years.

### **Representation and remedy**

19) Given legal restrictions on freedom of association and membership of trade unions in Qatar, how does your company ensure workers' voices are represented and heard by the company, e.g. through worker-representative committees? Please describe the mechanism in place.

**Answer:**

AKTOR encourages its workers to express their opinions freely and does not limit the freedom of assembly of its employees.

While there are restrictions concerning the ability of workers in Qatar to form or join a Trade Union, the law permits the formation of a joint committee with representatives of its workforce and management.

Detailed description of this mechanism is described in answer of the next question (20).

20) In accordance with the UN Guiding Principle on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers on your projects to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? Please provide a description of the company's grievance mechanism.

**Answer:**

Aktor Qatar has a Grievance Mechanism and workers are informed by the Welfare Manager for the grievance box and the procedure which is established in the Workers Accommodation. Also, HR Department is informing the workers verbally upon arrival and through visible notices and posters.

The company has A Workers' Advisory Committee that has been established and is located in our Workers' Accommodation facility. The Workers' Advisory Committee consists of 2 elected workers from each nationality who are responsible for communicating the workers' concerns and requests to the Company management in the context of the joint committee.

The Workers' Advisory Committee is not precluded from collective bargaining and the Workers are not restricted from industrial action if they feel that their grievances are not being addressed.

Workers have direct access to HR department during working hours. In addition a grievance box is established in the Workers Accommodation.

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<sup>4</sup> Lost time-injuries calculated on the basis of injuries resulting in incapacity for work of at least three consecutive days (excluding the day of the accident)

Workers are informed of its existence by the Welfare Manager and HR department upon arrival verbally as well as through visible notices and posters.

By direct contact with the workers and with monthly visits to their accommodation by a committee made of Administration and HR representatives as well as directly to HR with the ability to post anonymously through a “comments box”.

Once HR is informed of grievances, management is informed and a remedy procedure is initiated should there be a breach in standards.

Please find enclosed files with details of Grievance Mechanism procedure and relevant Whistle Blowing procedure to secure the severity and respect we face Human Rights in all our operations. At last, it would be a failure not to present our workers accommodations and facilities, please find attached below the relevant file.



Grievance  
Mechanism.pdf



Employees  
Accommodation Ma

21) How many grievances were raised in 2017 by directly employed and/or subcontracted workers on your projects? Please provide a summary of the grievances and the remedial actions that were taken by the company and its subcontractors.

**Answer:**

Complaint is defined as an act, omission or occurrence within the workers accommodation or outside which an employee feels constitutes an injustice and can be established on factual information. It may be related to any condition arising out of the residence within the workers’ accommodation or outside, including but not limited to:

- Living conditions (facilities, hygiene, safety, etc.)
- Food
- Transportation
- First aid
- Other services (i.e. laundry, barber shop, etc.)
- Discrimination
- Authority abuse

It does not include room allocation and transfers, established camp rules and regulations and any strictly work related issues such as salaries, dismissals, demotions, or suspensions. The Camp Manager encourages residents to contact the Head of HR for any issues not strictly related to the operation of the camp.

Taking the above into consideration, in 2017, we have recorded 32 complaints. These were processed through the grievance mechanism and are cleared smoothly within a short period of time.

AKTOR ensures that the licensed subcontractors it collaborates with also comply and implement the same Grievance mechanism. Through AKTOR's Quality Assurance, all activities are continually monitored for compliance and, if necessary, corrective measures taken for any non-conformities. Irreparable violation of Contracts may lead to cancellation of agreement.

### **Other information**

22) Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in Qatar, including any challenges it faces in doing so?

**Answer:**

Given the magnitude of the projects AKTOR undertakes in Qatar, it is a continuous challenge to ensure the welfare as well as the health and safety of our employees. The State of Qatar is assisting us by levelling the playing field with stricter and enforced regulation on labor law and welfare standards. As a competent international contractor, it is AKTOR's responsibility to have the organization, facilities and procedures in place in order to ensure the laws and standards are upheld and our employees enjoy the welfare conditions that every employee deserves.