

Questions for construction companies regarding working conditions in Qatar

Note: Question 11 provides the company with the opportunity to describe challenges confronted in the areas covered by the preceding questions

- 1. Social responsibility or human rights policy:** Does your company have a publicly-available commitment to human rights or to social responsibility? If so please share the link.

The health and safety, wellbeing and working conditions of all our employees are Carillion's highest priority. We set high standards of corporate governance, supported by policies and procedures that are applied rigorously throughout our business in the UK and internationally. These cover human rights and our social responsibility.

We are fully committed to sustainable procurement and the fundamental importance of ethical sourcing. We have a zero tolerance of modern slavery in all its forms in our own business and in our supply chain. This means not using forced or compulsory labour, and / or labour held under slavery or servitude. Carillion complies with the UK Modern Slavery Act 2015 in its entirety and we seek to work with suppliers to identify and manage areas of risk in our and their supply chain.

We continue to build a sustainable and successful business by delivering on our 2020 Sustainability Strategy and six positive outcomes, which support profitable, responsible growth and underpin our values as a responsible business. Carillion Qatar recently won the Construction Week 2016 Award for the Corporate Social Responsibility (CSR) Initiative of the Year, which is the third time that we have won this category. The award entry focused on the evidence behind Carillion's policies and strategy to support sustainable communities and provide better prospects for our own people throughout the year. More details about our approach to responsible business can be found in our 2015 Sustainability Report here: <https://www.carillionplc.com/about-us/sustainability/sustainability-reports-and-policies/>

Operations in Qatar

- 2. Scope:** Please describe the nature and scope of your company's operations in Qatar.

We have operated in the Middle East for over 40 years and we work hard to ensure that the high standards we set and achieve in respect of health, safety and sustainability, including the conditions we provide for our workforce, are best-in-class.

Carillion established its business in Qatar in 2009 and we now deliver a range of services covering construction, infrastructure and facilities management, to customers across the state. On the construction side we are contracted to deliver phase 1B of the Msheireb Downtown Doha project, a mixed-use development comprising retail, commercial, residential, leisure, cultural and community facilities. We are not involved at present in the construction of any venues or associated infrastructure projects for the 2022 World Cup.

- 3. Sub-contracting:** How many workers do you hire directly and how many are sub-contractors?

Carillion currently employs around 1100 people directly in Qatar and a further c5000 are employed through our sub-contractors.

- 4. Health and safety:** In direct operations and in contracts with sub-contractors:

- a) What is the company's approach to ensuring workers' health & safety in Qatar?
- b) Have you established occupational health and safety committees, and if so, do these have worker participation?
- c) How many accidents and fatalities have taken place on site in the last two years?

- a) Health and safety is at the very heart of our business. We believe that all of our people should be treated with dignity and respect and they should go home at the end of their working day without

suffering any kind of harm. We are clear that the health, safety and welfare of everyone on our sites takes precedence above all else. Our H&S systems of operation have been audited by Bureau Veritas and we hold BS EN 18001 accreditation for our operations in Qatar. Practice on site follows standards that we apply in the UK, for example a scaffold that we erect in Qatar will meet the UK standard in terms of its design, implementation and ongoing inspection requirements.

- b) All new employees on site, both directly employed and those working for subcontractors, receive a health and safety induction which ensures that they understand what they can expect of us, as well as what we expect of them in respect of the behaviour required for safe working. All personnel working on the Msheireb 1B site attend our one day H&S Engineering Construction Industry Training Board accredited training course and we also run a three day supervisors course. Job specific training and instruction is undertaken on an ongoing basis and includes Toolbox Talks, attendance at training sessions and visual impact training. This innovative approach to training has recently been rolled out in Qatar. It is delivered by actors who act out different scenarios in a very realistic way to communicate key messages about safety and working practices to overcome any language barriers which may exist with employees.

Employees and subcontractors also attend and form part of the monthly Safety Action Group and their input and interaction is valuable both for us to include their suggestions and also for them to clearly understand the standards that we expect of them. We operate a “Don’t Walk By” culture and system whereby all employees are actively encouraged to take responsibility and report any concerns or hazards they become aware of. More widely, the tasks our people carry out are planned through the development of method statements and risk assessments to ensure that inherent risks have been identified and are mitigated. This approach to the safe planning of work is further supplemented through point of work risk assessments. On our larger sites we also employ healthcare professionals who are available to support and treat employees with any health or wellbeing concerns, work or non-work related. On the Msheireb site we also employ a full time safety manager who is supported by a further 33 IMS professionals to ensure that our high standards of health and safety are maintained on site.

- c) We monitor performance on a continuous basis, including that of our subcontractors working on site, and take action immediately to address any issues. We have a very good Health and Safety record on site in Qatar and have achieved 10 million man hours without a lost-time incident on three separate occasions i.e. an incident which would prevent a worker from working for one or more days (not counting the day of the accident). We recognise that there is no single reliable measure of health and safety performance. What is required is a 'basket' of measures reflecting both inputs to health and safety management (leading indicators) and the outputs that result (lagging indicators). The below table shows our Lost Time Incident frequency rate which is the most commonly recognised industry standard:

Measure	2015 Target	2015 Performance	2014 Performance
Lost time incident frequency rate	0.073	0.066	0.02

5. Conditions of employment: In direct operations and in contracts with sub-subcontractors, labour suppliers and joint ventures, please describe the company’s policy and practice on:

- a) Contracts - ensuring they are in a language the worker understands and are not modified upon the worker’s arrival in Qatar
 - b) Timely payment of wages
 - c) Issuing ID and health cards for workers
 - d) Ensuring adequate worker accommodation
 - e) Passport retention - ensuring workers can store passports in a safe place and have access
 - f) Issuing of exit permits for workers who wish to leave the country
- a) All of our offers of employment and employment contracts are provided to workers in a language that they are able to understand. We are currently working with our sub contractors to encourage them to implement this practice into their core recruitment processes. Additionally we will have

introduced spot checks as part of our audit procedures to ensure that contracts are not changed upon arrival in Qatar.

- b) We ensure that our employees are paid in accordance with contractual obligations and Qatar Labour Law. In addition to their base pay they also receive other contractual entitlements such as flights home, holiday pay, health insurance arrangements, and accommodation and food. We are fully compliant with the requirements of the Wage Protection Scheme and submit a monthly return to the Ministry of Labour and Social Affairs on a monthly basis as per the requirement. We also require our preferred suppliers to comply with the requirements set within Qatar Labour Law and Wage Protection System and pay their employees in line with the contracts which exist between them.
- c) All of our employees are in receipt of a valid State of Qatar ID Residency Card which is issued to them following completion of the Qatar Residency visa process set down by the Government. Following approval and issue of this residency permit, all employees are issued with Health Insurance cards to ensure access to medical treatment at all times within Qatar.
- d) We provide a high standard of accommodation for our people. We undertake detailed reviews in advance of contracting with landlords for rental of accommodation, and we carry out regular audits to ensure that the standards we have set are maintained. The accommodation Carillion provides includes recreational areas such as sports facilities, TV rooms, shops, prayer rooms and canteens. In addition, we provide communication tools, such as Wi-Fi and internet. We hold regular meetings with accommodation providers to review any concerns our people may have, and create action plans to ensure these are addressed. In cases where accommodation is provided by our preferred suppliers for their people we carry out audits to ensure they comply with our standards. We monitor their accommodation standards on an ongoing basis to ensure that they comply with Qatar labour law. We have employed a dedicated team whose role is to carry out regular visits to new and existing subcontractor staff accommodation and carry out audits, working with them to implement the necessary improvements where appropriate. Should they be unwilling to meet our required standards or make the necessary improvements they are removed from our Project. Alongside Carillion's engagement with our direct suppliers, government officials carry out regular spot checks on living accommodation for workers in accordance with the legal requirements set out in Qatar.
- e) All of our people have the right to retain their own passport and each employee has a secure storage area in which to do so. Should they expressly request, in writing, for us to hold it for them we do so. Often this works out to be a safer and more secure option, so many of our own employees do request this. If we do hold passports for employees, they can request them back at any time. We also make it clear to our subcontractors that we expect them to comply with Qatar Labour Law which prevents employers withholding workers' passports.
- f) All foreign workers wishing to leave Qatar must arrange an Exit Visa through their sponsoring employer. Carillion operatives in Qatar accrue two months' leave over the course of their two year contract period; most use this time to visit their families. Workers wishing to terminate their contract of employment normally have to work a period of notice, as they do anywhere else, but once that is complete they are free to go.

6. Recruitment agencies:

- a) What process does the company go through to recruit migrant workers?
- b) Which recruitment agencies does your company regularly work with to hire workers? Please list names and contact details of the recruitment agencies.
- c) Does the company take steps to ensure that recruiting agencies it may deal with do not charge recruiting or placement fees? If workers have been charged fees, does the company compensate them for this expense on arrival in their position?
 - d) Does the company have a policy on the indirect employment of workers by business partners?

a and b) Where Carillion employs direct labour, we recruit with the support of recruitment companies on our Preferred Supplier List (PSL) for recruitment agents. This list has been developed through a robust assessment process which reviews the financial, ethical and professional conduct of each agent and ensures that they comply with Qatar Labour Law. In addition to the initial assessment at the point of appointment, we monitor performance and conduct by undertaking reviews and spot checks during recruitment processes in the relevant country to ensure compliance with our standards and requirements. This PSL is reviewed annually.

c) All recruitment fees are paid by Carillion and there are no fees paid by employees. In the event that we identify that fees have been charged or other unethical practices we ensure that action is taken to redress this with the affected individual and the recruitment company will be terminated from our preferred supplier list. Where appropriate, the matter will be reported to the relevant authority.

d). As a minimum, we expect all the subcontractors we work with to comply with all Qatari labour laws. We do not have direct control over the practices of our subcontractors, but we proactively review and monitor their employment practices and accommodation to ensure they meet with the high standards they require. Only those that do are added to our Preferred Supplier List.

7. Freedom of association:

a) Does your company have organizational-level policies and procedures in place on freedom of association for workers?

b) How does the company implement such policies in a context where local law restricts the ability of migrant workers to form or join trade unions, such as in Qatar?

Carillion has group wide policies and procedures in place which support freedom of association for workers. In countries such as Qatar, which restricts the ability of workers to form trade unions, we operate Employee Forums to ensure an open communication channel with our people. Examples of these include Accommodation Committees where we discuss and address accommodation improvements and our Recreational Committee where we organize activities such as cricket and football tournaments for all of our staff. We are in the process of defining an additional forum to focus on employee engagement and open communication. We also have Site Safety Action Groups, which include employees and sub-contractors, which provide another forum where concerns regarding accommodation, food, H & S etc can be raised and discussed at a site level. Furthermore we undertake a group-wide employee survey every year which enables our people to provide feedback on a whole range of issues which are important to them. This is anonymous and translated into local languages.

8. Grievance/remedy:

a) Does the company have a grievance mechanism that is accessible to workers directly employed by you and working indirectly for you via business partners - in their own language? b) How do you ensure that workers are aware of its existence?

c) How do you ensure that workers do not face retaliation from supervisors or others for raising grievances?

d) What processes do you have in place to address and remedy grievances?

Carillion has a global Ethics and Business Integrity Policy which includes our approach to the prevention of bribery and corruption. The policy outlines our commitment to ethical behaviour and our zero tolerance approach to any form of corruption. We also have an Ethics and Compliance Charter, and Carillion became the first support services company to receive the Investing in Integrity (IiI) Charter Mark. The rigorous accreditation process assessed our international operations, and included site visits, interviews and surveys by an independent assessor (the Good Corporation), alongside analysis of our ethical policies, procedures and practices. We are committed to the preservation of our reputation and integrity through compliance with applicable laws, regulations and ethical standards across all territories in which we operate. All employees are expected to contribute to a culture of openness, and responsible decision making and conduct all business according to the highest professional and ethical standards and practices.

We have a Grievance Policy and procedure which is in place and communicated to employees as part of their induction process. In addition, we operate a number of communication forums with our employees, where we discuss issues and concerns, and remind them of the various support mechanisms which exist should they have a concern. We have also introduced quarterly briefing sessions, where we remind employees of their employment rights in their own language and are developing a handbook of rights which will be issued for their reference.

We continuously review how we can communicate more effectively and provide various channels for raising concerns safely and are committed to ensuring our people find these easy to access.

A freephone independent whistleblower hotline is in place and accessible globally. This is translated into relevant languages at a local level to ensure our employees are able to express any concerns they may have easily.. Calls/emails can be made anonymously by anyone, including employees, suppliers and clients, and all reports are investigated fully and appropriate follow-up action is taken to address any issues. Posters advertising this service are located within offices, sites and accommodation visits and have been translated into home language.

9. Public engagement:

- a) Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in Qatar?
- b) Who should be contacted if workers or civil society groups have questions or concerns about your company's Qatar operations? Please provide contact information

- a) Matthew Ashwell, Chief Operating Officer for Carillion in MENA.
- b) Depending upon the specific nature of the questions or concerns about Carillion's activities in Qatar these can either be directed to the local team, the Carillion Press Office on +44 (0) 845 129 7659, or the Whistleblowing Hotline – see above.

10. Engagement with Qatari government:

- a) Does the company engage the Qatari government to encourage enforcement of the labour law in areas such as passport and fee retention?
- b) Has the company raised concerns with the government about elements of the “kafala” sponsorship system that restrict workers' ability to change jobs or leave the country?

Carillion is committed to engaging with appropriate international, government, non-government and independent organisations and contributing our knowledge and expertise for the common purpose of maintaining good working conditions and high safety standards – both ours and those of the wider industry. As part of this we regularly attend Industry, Government and Non-Governmental events on welfare practices.

- 11. Challenges:** Please describe any challenges your company is encountering in the areas described above.

Further information and guidance:

[OCED Guidelines for Multinational Enterprises](#)

[UN Guiding Principles on Business and Human Rights](#)