

Ref: AKT-GEN-LTR-2016-0239

31st October 2016

Business & Human Rights Resource Centre

Tel: +1 845 541 7858

Email: bhacker@business-humanrights.org

Attention: Ms. Mariam Bhacker

Project Manager – Gulf Construction & Migrant Workers

Subject: Opportunity to Provide Information: Aktor & Qatar Working Conditions

Dear Ms. Bhacker,

We thank you for your interest in our company and our operations in Qatar in particular. We welcome any opportunity to discuss the high standards under which we operate internationally and in the State of Qatar as it is our firm belief that it is very important to showcase the high standards that the State of Qatar demands and that proudly delivers. Please find attached the responses to your questionnaire.

We are at your disposal should you wish to learn more or discuss any of the content further.

Sincerely,
For and on behalf of AKTOR S.A.



Nikolaos Rigas
Authorised Representative

Attachment(s): Response to questions for construction companies regarding working conditions in Qatar

Receipt Acknowledged: _____

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.

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

Operations in Qatar

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

AKTOR Qatar is primarily engaged in the construction of technically challenging projects and the provision of Facility Management services for government entities or high profile private clients.

AKTOR Qatar is a Member of ELLAKTOR Group, a highly diversified international company, focused on Construction (Infrastructure, Buildings and Photovoltaic) Facility and Project Management as well as Mining.

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

As of 31st October 2016 AKTOR employs:

- 4,635 workers directly
- 3,728 workers employed via 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?

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

- Qatar Construction Standards (QCS) 2014
- OHSAS 18001 Occupational Health and Safety
- Qatar Foundation Mandatory Standards
- AKTOR Sustainability Report

Link:

http://content-mcdn.feed.gr/pegasus/Multimedia/pdf/ENV_STATMENT_2015_id5903145.pdf

- AKTOR Qatar Integrated Management System Policy Statement
http://www.aktor.gr/total_quality_management

- AKTOR Qatar Health and Safety manual
Link: 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
- To maintain a cordial and collaborative relationships with the competent agencies.

b) Have you established occupational health and safety committees, and if so, do these have worker participation?

A Health and Safety Committee has been established. It is located in the Company Workers' Accommodation and workers have welcomed it with continuous participation, sharing information and feedback with attendants. Management and employees jointly examine and discuss issues of mutual concern seeking acceptable solutions to problems through a genuine exchange of views and information. Such Safety Committee meetings are set for the first of the month at 3.00 pm.

c) How many accidents and fatalities have taken place on site in the last two years?

There have been no serious accidents and fatalities on AKTOR Qatar's sites in the last two years. In fact there have been no fatalities since the company began operations in Qatar in 2004.

d) What measures do you have in place to protect workers from high temperatures during the summer months? How do you communicate these measures to the workers?

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, will notify all concerns and will display/post the memo with time-table of working hours in visible places like Bulletin boards in workers accommodation & worksite.

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 understand and are not modified upon the worker's arrival in Qatar.

Contracts are written both in English and in the native language of the candidate. The candidate signs the contract after successfully passing the interview and being selected by the authorized representatives of the Company during recruitment trips.

b) Timely payment of wages.

Wages are paid once a month to all employees regularly and timely through electronic bank transfer under Wage Protection System or WPS. This system was enforced last November 2015 to make sure that all payments to workers are electronically transferred through direct

bank deposits making it easier for the government to scrutinize and document any late or non-existing payments.

The State of Qatar is treating the matter of delayed workers' wages very seriously. In February 2015 HH the Emir Sheikh Tamim bin Hamad Al-Thani issued Law No. (1) of the year 2015, amending some provisions of the Labour Act No. (14) of the year 2004.

c) Issuing ID and health cards for workers.

The Company makes all necessary arrangements for our employees to obtain a Qatari ID and Residence Permit after entering Qatar. Health cards for all AKTOR employees are issued once ID procedure is finalized and Residence Permit is obtained.

d) Ensuring adequate worker accommodation.

Workers are accommodated in AKTOR's Workers' village, which exceeds the Qatar Labor Law requirements.

As AKTOR strongly believes that the company's strength lies in the workforce, spent tens of millions Qatari Riyals worth for a brand new workers accommodation with facilities and amenities described by the latest Qatar Foundation Standards (2013) which is over and above Qatar Labor Law Standards.

e) Passport retention - ensuring workers can store passports in a safe place and have access.

Our Company offers employees the option to store their passports safely, while having access to them anytime upon their request. Workers can select to keep their passports themselves.

f) Allowing Workers to transfer employers within the country.

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

g) Issuing of exit permits for workers who wish to leave the country.

As per our Company's internal procedures, Administration Department issues exit permits to workers after receiving their leave application forms or day/s before their travel dates. AKTOR utilizes the services of the e-government and all exit permits are issued electronically.

6. Recruitment agencies:

f) What process does the company go through to recruit migrant workers?

Recruitment trip preparation

AKTOR first requires approval from the Qatar Chamber of Commerce, the Ministry of Foreign Affairs and the Embassy of the country from which it intends to recruit. This is obtained with the assistance of the agencies that exist for this purpose in Qatar.

The selected agency then arranges a recruitment schedule and advertises in the recruitment country to attract candidates. Human Resources and Technical representatives of AKTOR then travel to the recruitment country for the selection. AKTOR dispatches at the very least one representative who is fluent in the local language for every recruitment trip.

Selection / Interview

Candidates are assessed on their technical expertise and experience. Salary offers are based on ability and seniority and follow set bands. Offers are made to candidates in the presence of the agency representative who countersigns the acceptance. The offer and contract are in both English and the candidate's native language.

Preparation for Arrival

The Agency provides a complete list of the selected candidates who are then screened medically in their home country to confirm that they will meet the Qatari requirements.

Visas are applied for after medical screening and normally take three days to one week to issue. Once approved, visas will be forwarded to the Agency in order for them to get approval from the recruitment country's government and complete those local formalities. Flights are booked by AKTOR for workers once they are ready to travel.

Arrival

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 a project. We aim to have new workers will usually be assigned and working on site within two days of their arrival in Qatar.

b) Which recruitment agencies does your company regularly work with to hire workers? Please list names and contact details of the recruitment agencies.

NAME OF AGENCY	CONTACT PERSON	EMAIL ADDRESS
AL KARIM AGENCY	Mr. Fouad Hanna	alkarim.qatar@gmail.com
UNI TRUST AGENCY	Mr. Licenio Gurango	liceniogurango@yahoo.com
ASIA POWER	Ms. Shilpa Jadhav	shilpa@asiapoweroverseas.com
TRUST AGENCY	Mr. P.K Sundaram	trustrecruitmentservices@gmail.com
ISS	Mr. Bhuddie Thapa	thapa.buddhiprakash@gmail.com

- 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?

It is a legal requirement to recruit via a recruiting Agent, the legal entity approved and required by most host governments. AKTOR is demanding from the recruiting agencies not to charge candidates any recruitment or placement fees and takes steps during the recruitments trips 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 our company become aware of such fees then the charging agencies are no longer selected.

- d) Does the company have a policy on the indirect employment of workers by business partners?

AKTOR upholds a very high standard for its own workforce and demands the same from business partners for indirect employment. This applies to both joint venture partners and subcontractors. AKTOR's policies are shared and audits take place to ensure adherence. Should a subcontractor or partner be found to be non-compliant then AKTOR undertakes to accommodate the workers within its own facilities.

7. Freedom of association:

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

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

- 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?

While the restrictions concern 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.

A Workers' Advisory Committee 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.

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?

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

b) How do you ensure that workers are aware of its existence?

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

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

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".

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

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

9. Public engagement:

a) Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in Qatar?

The ultimate responsibility lies with company's board of directors based in Athens. In Qatar the company's Head Office Manager, Mr. Nikolaos Rigas 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.

Mrs Ioanna Mavridou

HR Manager, Qatar

imavridou@aktor.qa

+97444562811

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?

AKTOR has engaged the Qatari government to encourage enforcement of the labour law in passport and fee retention areas within open Governmental events and meetings.

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?

AKTOR is supporting Government plans for the abolition of Kafala system and has raised concerns within open Governmental events and meetings. In line with this approach the Company is acting with flexibility to such issues for employees regardless nationality.

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

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 leveling 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 every employee deserves.