

Hotel companies in the Gulf: 20 questions on human rights

Introduction to the survey

International standards on responsible business – including the OECD Guidelines on Multinational Enterprises and the UN Guiding Principles on Business and Human Rights – call on companies to have policies and systems in place to avoid, mitigate and remediate harmful impacts on people and the environment.

Spurred by the concerns of owners, investors, customers and civil society, the hotel industry has made great strides in integrating sustainability and due diligence into their operations. However in some jurisdictions key challenges remain.

The legislative environment and workforce composition in the Gulf States pose significant challenges for companies to protect their workforce from exploitation. The appalling working and living conditions faced by migrant workers have been well documented by the press and in NGO reports.

Companies can find themselves being inadvertently complicit in this abuse, which may have serious operational, legal, financial and reputational consequences. As international scrutiny of businesses increases in the lead up to the 2022 Qatar World Cup and World Expo 2020 in Dubai, responsible action from companies will help them to avoid these risks as well as contribute to rising standards of worker welfare.

The survey below asks a set of questions designed to understand what policies and processes hotel companies have in place to protect migrant workers in their operations in Qatar or the UAE. We invite your participation in the spirit of transparency, shared learning and dissemination of good practice.

Human rights

1. Does your company have a publicly available commitment to respect human rights? If so, please provide the link. **Yes;**
<http://www.marriott.com/Multimedia/PDF/Corporate/HumanRightsStatement.pdf> and
<http://www.marriott.com/Multimedia/PDF/Corporate/HumanRightsCommitment.pdf>
2. Does your company identify its salient human rights issues and does it have a due diligence process to manage them? (Key steps include: assessing actual and potential human rights risks, integrating and acting upon findings, tracking responses, and communicating how impacts are addressed). **We work collaboratively with our industry association and industry peers to identify relevant human rights issues that affect our sector and address those issues within our sphere of influence. These collective efforts can be found on the International Tourism Partnership website:** <http://tourismpartnership.org/human-rights/>

Marriott implements an ongoing risk management process to identify, prevent and mitigate relevant human rights risks. Our internal audit department conducts an annual Ethical Conduct Survey across a broad section of associates, including all officers and senior managers. We provide associates with a variety of means, including anonymous channels, to report unethical behaviour. This includes a toll-free international Business Integrity Hotline. The Company does not tolerate any retaliation against individuals who raise concerns in good faith and has in place measures to protect such individuals.

If so:

- are these assessments conducted at headquarter, regional, country and/or operational level? **Assessments are conducted as needed on a regional, country and/or operational level.**

- please list the issues identified and share a link to any accompanying public reporting by your company. **Please see human rights policy and commitment statements above. See also our Business Ethics and Human Rights Report: http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015_Reports/2015_BusinessEthicsandHumanRights.pdf and corporate website that publicly reports on relevant human rights issues: <http://www.marriott.com/corporate-social-responsibility/corporate-values.mi>**

Communicating human rights along the supply chain

3. How does the company use its leverage to influence business partners with regards to human rights policy and practices? (E.g. business partners: franchisees, building and hotel owners, hotel management companies etc.) **Marriott works to hold its suppliers and contractors around the world to similar ethical business standards and human rights compliance it supports as defined within Marriott's Global Supplier Code of Conduct. Please see our Responsible Sourcing Report: http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015_Reports/2015_ResponsibleSourcing.pdf**
 - what challenges does your company face in doing so?
4. Does the company require third-party contractors to comply with the company's policies and standards? (E.g. third party-contractors: recruitment firms, labour suppliers and service providers). **The company requires third-party contractors to comply with local laws prior to contracting. Legal documentation related to validity of operating licenses for all contractors are reviewed as part of the bidding process and reviewed annually. Companies that provide contract/casual labour are required to provide copies of residency/work permit documentation for all staff being contracted in addition to food handlers' certificates for staff in food handling positions.**

If so:

 - how are these policies communicated to third-party contractors and how is their compliance monitored and enforced?
 - what challenges does your company face in ensuring third-party compliance?
5. What steps has the company taken to mitigate the human rights risks associated with the construction phase of hotel buildings? **As a management and franchise company, and a member of the International Tourism Partnership, we, along with peer hotel company members, are working to better understand the human rights risks associated with the construction phase of hotel buildings.**
 - what challenges does your company face in doing so? **We do not construct the hotel buildings.**
6. How does the company ensure that workers (including agency staff) are made aware of their labour rights and company labour policies in a language they understand? **Marriott has a Business Conduct Guide, available in 15 languages, to reinforce the importance of corporate values and ethical responsibility to the continued success of both our company and, more broadly, the travel and tourism industry. In addition to the Business Conduct Guide, we created a Quick Reference Companion document that provides clear and realistic guidelines that our associates can easily follow and will help them understand where the line is drawn between acceptable and unacceptable workplace behaviour. The Companion is available in 31 languages.**

Business operations

7. Describe the scope and structure of your company's operations in Qatar.

Please include information on:

- the number of hotels and rooms
- the names of the hotels
- the type and explanation of the business models they operate under (owned and operated; leased; managed properties; franchised properties; joint ventures; other).
- the level of the company's responsibility for human rights under these various arrangements.

No.	Name of hotel	No. of rooms	Business model	Explanation of business model including level of responsibility for HR practice
1	Doha Marriott hotel	362	Managed	Direct management of employees
2	The Ritz Carlton - Doha	374	Managed	Direct management of employees
3	Sharq Village & Spa	174	Managed	Direct management of employees
4	Marriott Marquis	577	Managed	Direct management of employees
5	Sheraton Grand Doha Resort and Convention Hotel	371	Managed	Direct management of employees
6	The St. Regis Doha	336	Managed	Direct management of employees
7	The Westin Doha and Spa	365	Managed	Direct management of employees
8	W Doha Hotel and Residences	442	Managed	Direct management of employees

The remaining questions apply specifically to migrant workers in the company's operations in Qatar.

Recruitment

8. What categories of workers are directly employed by the company? **In Qatar, we hire only full time salaried employees. All employees are paid a fixed monthly salary with additions for service charge, tips, incentives and various fixed benefits. Although we manage and select the employees, the employment entity is an ownership entity with Marriott having Power of Attorney.**

Please see our Workforce Development Report:

http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015_Reports/2015_WorkforceDevelopment.pdf

9. Please describe the company's recruitment process for workers that it hires directly.

- do you use recruitment firms to supply these workers? **Yes**
- does the company pay the charges and costs associated with recruitment (agency fees, travel costs, visas, medical checks) or are these costs paid by the worker? **We pay all of the charges related to recruitment fees to the firms including relocation travel costs, visas and government required medical checks. We do not charge any fees associated with recruitment. Our complete statement on recruitment scams can be found [here](#).**

10. What categories of worker in the hotel are agency staff employed by a third party? (E.g. subcontractors, service providers or labour suppliers)

Depending on the needs of each hotel, third-party employees can be placed in a variety of roles, such as security personnel, restaurant & banquet servers, housekeeping attendants, stewarding, engineering and landscaping.

- what due diligence checks does the company undertake to ensure that these third-party agencies are operating legally and ethically? **Legal work authorization (Qatar Residency cards) of each employee is requested and copies maintained. We also request and maintain third-party agency's operating licenses to legally operate in the country and provide the service as per the agreement.**

Conditions of employment

What policies and processes does the company have in place to:

11. Prevent contract substitution? **The contract/offer letter signed prior to arrival at host country is the exact same contract that is honoured during the course of the employees' tenure. The Business Integrity Line may be used by an employee to reporting complaints related to any unfair work place practices including unfair treatment, unauthorized termination, harassment, etc. The Business Integrity Line allows for employees to remain anonymous whilst reporting their grievances.**

(I.e. the process whereby the terms of reference in the contract the worker signs in their home country is different to that which they sign on arrival in the host country)

12. Ensure workers are issued with and have access to all necessary documentation including their passports, IDs and medical cards, and that these documents are renewed on time?

Passports and IDs are not kept with the employer but handed over to the employee as soon as the required work authorizations are obtained. In some cases, the employee may request for the employer to keep only the passport for the purpose of safe keeping but is required to request this in writing.

13. Ensure timely and full payment of a wages?

Please include information on the company's policy and processes re:

- a. payment of minimum country-of-origin regulated salaries – **Salaries are paid based on minimum salaries set by local labour authorities.**
- b. overtime pay - **Overtime is paid, as per the labour law**
- c. equal pay for equal work regardless of nationality – **Salary scales are set by position not nationality. However local authorities have set minimum salary guidelines for local nationals in addition to pension contributions which are different to what can be offered to expatriates.**
- d. prevention of illegal deductions – **No deductions are made to employees' salaries without their consent. Salary deductions need to be authorized by the employee and approved by Finance and Human Resources. Deductions are made for salary advances, payment for tickets (over and above employee's entitlement), insurance for family members not covered under the employee's contractual terms, etc.**
- e. other pay related issues

14. Ensure the health and safety of its workers? **Please see our Health, Safety and Wellbeing Report:**

http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015_Reports/2015_HealthSafetyandWellbeing.pdf

Please include information on the company's policies & processes re:

- a. health & safety training -
- b. injury prevention
- c. maximum working hours and overtime

- d. non-discrimination
- e. prevention of physical, sexual and verbal abuse
- f. any other health and safety related issues covered by the company's policies & processes

15. Issue transfer permits and exit visas?

The company's issues transfer permits (NOC – No Objection Contract) wherever ownership has granted us the authority to do so. In some cases, the operator must obtain ownership approval to provide NOCs.

16. Please list any other labour-rights issues your company has identified in Qatar and the policies and processes in place to manage them. **N/A**

Worker accommodation

17. Does the company provide accommodation for its employees? **Yes, but only for those employees that we employ directly.**

- if using agency staff who provides their accommodation? **The third-party agency provides accommodation for their respective staff.**
- if employee or agency-staff accommodation is off site what checks are undertaken to ensure that all accommodation is of a decent standard? **Human Resources has direct responsibility for accommodations provided to our employees. Buildings are rented and lease agreements signed following inspections of the buildings including required meeting of all local fire safety codes of the country. Monthly inspections are carried out together with preventive maintenance contracts for plumbing, electrical and mechanical equipment.**

Grievance & remediation

18. What mechanisms does your company have in place to facilitate freedom of association and alternative forms of organizing in a context where local law restricts the ability of migrant workers to form or join trade unions? **Whilst Marriott supports the freedom of association and the right to choose a collective bargaining representative, if desired, there are currently no alternative forms of organizing or similar associations in Qatar for employees to join.**

19. Does your company have a grievance mechanism? If so, please describe the procedures in place to submit, process and remedy grievances. **We provide associates with a variety of means, including anonymous channels, to report unethical behaviour. This includes a toll-free international Business Integrity Hotline and a complimenting online channel. The Company does not tolerate any retaliation against individuals who raise concerns in good faith and has in place systems to protect such individuals.**

20. What steps does the company have in place to remedy cases where:

- a. workers have been charged recruitment fees? **In an effort to raise awareness of and prevent recruitment scams, we have developed guidance for jobseekers and a list of approved Marriott e-mail domains that can be found [here](#). Marriott managed hotels do not require payment of a fee to be considered for employment. We also do not accept job applications via email or fax. Our complete statement on recruitment scam can be found [here](#).**
- b. workers have not been paid on time or in full? **Employees are paid regularly and in a timely manner.**

- c. workers have been victims of discrimination, physical, verbal and/or sexual abuse? **There is a process known as the Guarantee of Fair Treatment where employees may address and report issues to their supervisor, supervisor's supervisor or the General Manager of the unit. They may also use the Business Integrity Line to address and report issues that may not have been resolved at the unit.**
- d. workers have been threatened or faced retaliation for expressing grievances? **The Company does not tolerate any retaliation against individuals who raise concerns in good faith and has in place measures to protect such individuals.**