

2018 Questions for Hotel Companies in the UAE
Migrant Worker Rights

Scope of operations

1. Please describe the scope and structure of your company's operations in the UAE in the table below, including the business model each hotel operates under (owned and managed; leased; managed properties; franchised properties; joint ventures; other).

No.	Name of hotel	Business model	Property owner
1	Hyatt Regency Dubai	Managed	N/A
2	Grand Hyatt Dubai	Managed	N/A
3	Park Hyatt Dubai	Managed	N/A
4	Hyatt Regency Dubai Creek Heights	Managed	N/A
5	Hyatt Place Dubai/Al Rigga	Managed	N/A
6	Hyatt Place Dubai/Baniyas Square	Managed	N/A
7	Hyatt Capital Gate Abu Dhabi	Managed	N/A
8	Park Hyatt Abu Dhabi	Managed	N/A
9	Grand Hyatt Abu Dhabi	Managed	N/A

Human rights and due diligence

2. Does your company have a publicly-available policy commitment to respect human rights in its operations and throughout its business relationships¹, that addresses workers' rights? Please provide links or attachments to the company's relevant policies.

Yes- [Hyatt Human Rights Statement](#)

3. Does the company have a human rights due diligence process for identifying and prioritizing workforce risks in its operations and throughout its business relationships in the UAE? If so, please explain this process and highlight the top three workforce risks relating to a) its direct operations and b) its value chains.

Hyatt has a long-standing commitment to support and respect the fundamental protection of human rights for all people as embodied in the Universal Declaration of Human Rights. Our Human Rights Statement articulates our commitment to respect the rights of our colleagues, guests, and business partners, who we also expect to uphold the same principles. Hyatt continuously assesses evolving human rights issues that have the potential to intersect with our business. Given the complexity of this issue, especially in a global context, we frequently collaborate with industry groups and experts to shape our knowledge and awareness of human rights. For example, Hyatt works in close partnership with the International Tourism Partnership (ITP) and is a leading member of the organization's Human Rights working group. ITP has consulted with stakeholders and member forums to identify the most relevant human rights risks in the industry. Through this process, the following

¹ According to the [UN Guiding Principles on Business and Human Rights](#), the term "business relationships" encompasses business partners, entities in the company's value chain and any other State or non-State entity directly linked to its business operations, products or services. This includes entities in its supply chain beyond the first tier and indirect as well as direct business relationships. The business partners we are primarily interested in for the purposes of this survey are **hotel property owners, labour suppliers, and service providers**.

areas were identified as potentially high risk to human rights: the development and construction phase, supply chain and procurement, recruitment, and the potential use of hotels as venues for human trafficking.

4. Does your company include labour practices relating to recruitment, working, and living conditions, as part of its due diligence criteria when deciding to enter into business relationships in the UAE?
5. Does your company require hotel property owners and subcontractors in the UAE 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, brand standards) and what mechanisms do you employ to monitor and evaluate their compliance?

If no:

- b) Does your company engage with its hotel property owners or subcontractors on issues related to their human rights practices (e.g. through workshops, training, audits)? Please provide details. *Hyatt requires vendors with whom Hyatt has contracts to abide by Hyatt corporate policies, including our [Supplier Code of Conduct](#).*

Recruitment

6. If you directly employ workers, please describe your company's process for recruiting migrant workers to the UAE.

All vacancies are posted on the company's career site, and open to any applicant to apply. Many applicants apply directly to the hotels via email and are encouraged to apply through the career site. Hotels also visit hotel schools for recruitment of graduates and sometimes make recruitment trips to recruit in specific countries.

7. Does your company have a publicly-available written policy to respect migrant workers' rights, that addresses the human rights risks they face during recruitment? Please explain how it applies to workers that are both directly employed and subcontracted at your hotels.

[Hyatt Human Rights Statement](#)

Please also include the following information:

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

The Letter of Employment (LOE) signed by the employees upon recruitment is the same upon arrival to the UAE. (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)

- 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? How could you demonstrate that workers (both directly employed and subcontracted at your hotels) do not incur any fees?

Most of the recruitment is done directly by the hotel and all recruitment cost paid for by the hotels, example Visa, Medical Check, Flights.

When a recruitment agent is used, which happens only for mass recruitment alike during a new opening, the respective hotel stress to the recruitment agency that no fee is to be charged and hotels pay the recruitment agent a fee for its services.

- 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 (both directly employed and subcontracted at your hotels).

*We do not have a policy and in the LOE, there is the following clause:
Please note that reasonable expenses incurred as a result of your pending relocation, such as the cost for visas, inoculations, etc. will be processed for reimbursement upon the production of the relevant receipts.*

8. What are the most common countries of origin of migrant workers operating in your directly employed and subcontracted workforce?

We have a mix of nationality working in the hotels in Dubai, with over 50 nationalities. The biggest number are from India, Nepal, Philippines and Sri Lanka.

Payment & wages

9. What is your company's process for determining the wages of workers in the UAE, and what external benchmarks does it use to set wage levels (e.g. do nationalities play a role in determining salary scales, do you consider a living wage in setting wage amounts)? Please explain how these policies apply to workers who are both directly employed and subcontracted at your hotels.

*All employees irrespective of nationality are paid in the same established scale based on qualifications and experience, and received same benefits based on their level.
We participate in an annual salary survey conducted by Aon Hewitt.*

10. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are paid on time and in full, including for overtime and without illegal deductions?

A monthly payroll process is in place through an HR system and Finance. Salaries are paid on a timely basis.

What steps does the company take when entities in its value chain fail to pay workers on time and in full?

Hotels pay their employees on time and would not work with vendors who didn't pay their employees on a timely basis.

Freedom of movement

11. How does your company ensure that workers (both directly employed and subcontracted at your hotels) have free and secure access to their passports, identity documents, and other valuables? What steps does the company take when entities in its value chain fail to ensure workers have sole, secure access to these personal items?

Hotels do not hold on to the passports of directly employed employees.

12. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are free to change jobs and/or leave the UAE at will and without penalty?

Legally in UAE, no company is allowed to refuse an employee to change jobs. If an employee is leaving the hotel before completing the duration of their contract, then there is a pro-rate recruitment expense to be reimbursed.

What steps does the company take when entities in its value chain prevent workers from changing jobs and/or leaving the UAE at will?

Same as above

Health & safety

13. Please describe your company's health & safety policy and procedures, including what steps the company takes to ensure that they are applied to workers (both directly employed and subcontracted at your hotels).

Areas covered may include, but are not limited to:

- health & safety training *This is provided during orientation and those employees in housekeeping or F&B get continuous training prescribed by UAE government.*
- injury prevention *All employees are covered by workers compensation prescribed by UAE law*
- maximum working hours per week and overtime *48 hours per week. Overtime is not encouraged but compensated for with time in lieu*
- sick leave *Prescribed as per UAE Law.*
- non-discrimination *Discrimination is punishable by UAE law and we also follow Hyatt's policy for Dignity, Respect and Harassment Policy. Additionally, Hyatt has a Diversity and Inclusion Council.*
- prevention of physical, sexual and verbal abuse- *Punishable by law.*

Living conditions

14. Please describe your company's standards for workers' living conditions both directly employed and subcontracted at your hotels).

We have our own accommodation village, which has a residential complex feel, with numerous amenities, social and recreational facilities, including swimming pool, sports area, gym, laundry facilities, nurse, wireless internet, etc. Various levels of employees live in the same complex, including senior management and their families.

15. How does your company ensure workers are provided with safe and decent accommodations, including safe transportation, and access to healthcare and financial services? What steps does the company take when entities in its value chain fail to house workers in adequate living conditions?

As per the above, colleague accommodation which has security, lifeguard and nurse on site, is provided to all levels of employees. Transport is provided to and from work. By law all employers are required to provide medical insurance to their employees. Nurses and doctor visits are also available on property. Where possible the hotels assist the employees with paperwork in order to open a bank account.

Workforce data

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

If not, please provide information on the number of:

Not available publicly

Employment type ²	Total numbers of workers	Male	Female
Directly employed			
Employed by property owner			
Employed by subcontractors (service providers)			
Employed by subcontractors (labour suppliers)			

17. Please specify the typical activities conducted by your:

- a) Directly employed workforce – *Most positions*
- b) Subcontracted workforce: *mostly Security positions with some other departments, such as landscaping, utilizing a minimum number of outside vendors. Examples: Reception, cleaning, security, maintenance, gardening, restaurant staff, management etc.*

Representation & remedy

18. Please indicate if the company has a global policy commitment on freedom of association and collective bargaining for workers in its direct and subcontracted workforce. If yes, please provide links or attachment to the relevant documents.

[Hyatt Human Rights Statement](#)

19. Given legal restrictions on freedom of association and membership of trade unions in the UAE, 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.

We conduct a Colleague Experience Survey and the employees are able to add their comments. We have monthly group discussions with hotel employees called HyattTalks. We practice an Open-Door policy and employees can speak up anytime

As a company we have an Ethics hotline, and any employee can anonymously express any concerns. Toll free, anonymous ethics hotline.

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

Same as above.

21. How many grievances were raised in 2017 by workers (both directly employed and subcontracted at your hotels)? Please provide a summary of the grievances and the

² Employees may be 1) directly employed workers with whom you have a contract of employment and to whom you pay wages; 2) workers employed by the entity that owns the hotel branch; 3) workers employed by subcontractors; 4) workers employed by labour supply/manpower agencies.

remedial actions that were taken by the company and its subcontractors, and whether follow up actions were taken to check if workers were satisfied with the outcome.

We don't provide this information.

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 the Gulf region, including any challenges it faces in doing so?

We conduct a Colleague Experience Survey and the employees are also able to express their opinion including adding free text comments. The survey is administered by a third party and is anonymous.

Hotels conduct monthly HyattTalks and employees are free to express their concerns directly to the General Manager.

We practice an open-door policy and any employee can reach out to their respective managers or Human Resources for any grievance they may have.

Attached is our Harassment Policy, which covers non-retaliation [Hyatt Harassment Policy](#)