Business & Human Rights Resource Centre

“We were treated as if we were machines”

Migrant workers powering Saudi Arabia’s energy transition

Contents

Executive summary

We are witnessing a drive to renewables amidst the escalating climate emergency and increasing energy insecurity in a world on fire. Deep, rapid and sustained decarbonisation is crucial, and businesses and investors are central to this transition: investment in clean energy worldwide will need to triple by 2030 to reach net zero by 2050 and 90% of global electricity generation will need to come from renewables.

The energy transition represents a huge opportunity for business, people and planet. However, this opportunity can only be realised if the transition is not only fast, but also fair – including for the communities and workers upon whose support the transition depends. This must include the most vulnerable in renewable energy supply chains – migrant workers – across the globe, even in jurisdictions where protection of these marginalised labourers is at its weakest, such as in the Gulf Cooperation Council (GCC).

> *"Without the labourers, these projects would not be possible... Labourers are the foundation of these projects, the ones who turn difficult plans into reality through their hard work. Yet, they are subjected to such unfair treatment.*
>
> **Nepali construction worker on NEOM Green Hydrogen Project**

While the renewable sector has made significant strides in human rights policy commitments and practices, migrant workers continue to fall through the gap. Using a deep dive on the renewable energy sector in Saudi Arabia as a microcosm of the human rights risks in the industry for the region, as well as live tracking by the Resource Centre of 40 renewables projects there and interviews with workers, this report brings this into sharp relief: over half (53%) of migrant workers interviewed for this report experienced five or more indicators of forced labour.

These abuses evidence an environment of alarming dehumanisation. One migrant worker on a Saudi Arabian renewable project put it simply: [we] are *"treated as if [we] are machines."*

Renewable energy, multinationals and Saudi Arabia

Saudi Arabia is home to both excellent resources for renewable energy expansion and a state-level commitment to rapidly capitalising on these, including through several agreements signed in July 2025 to export renewable energy to Europe. The coming years therefore promise to bring substantial increases in renewables investment across the country and growing global trade.

Alongside the growth of the industry, this report also documents the abuse of migrant workers delivering these projects within the supply chain of well-known multinationals. Interviews with Nepali and Bangladesh workers surfaced exploitative working conditions on nine renewables projects, including **Al Kahfah Solar PV Project**, **Sudair Solar PV Project**, **NEOM Green Hydrogen Project**, **Muwayh Solar PV Project** and **Saad 2 Solar PV Project**.

> *[Companies] only need workers who work well for them. They don't care whether they paid money or not. They don't care whether they were exploited or not. They just want to make money from the workers. This is the real game of companies.*
>
> **Nepali construction worker on NEOM Green Hydrogen Project**

Multinational companies and financiers linked to these projects include major global energy firms such as **ACWA Power**, **Air Products** and **Saudi Aramco**; large construction contractors such as **Larsen and Toubro** and **PowerChina**; and international banks such as **Standard Chartered**, **HSBC** and **JPMorgan Chase**. See here for full list of companies linked to these projects.

These findings of abuse are particularly concerning as Saudi Arabia increasingly touts its 'sustainability' to consolidate its soft power abroad while obfuscating human rights abuses, including in its recently ratified bid to host the 2034 Football World Cup. The bid spotlights World Cup host city NEOM and its green hydrogen power plant, where abuses were identified in this report, yet makes no mention of the migrants whose labour helps power the renewables industry or the risks they face more widely in the country.

> *I worked under a supply company, so there were many problems. Everything was problematic. You cannot even imagine how that was. It was like hell.*
>
> **Bangladeshi construction worker on Saad 2 Solar PV Project**

In this context, **it is vital the experiences of migrants are surfaced, not silenced**. This report seeks to fill this gap, through:

- **Overview** of the renewable industry landscape in Saudi Arabia, and an outline of the risks migrants face due to the structure of the industry.
- **Testimony** from 34 migrant workers employed on nine renewable energy projects in Saudi Arabia, alleging a range of human rights violations.
- **Analysis** of the public human rights commitments of 16 companies we have linked to projects where we identified abuse, and an overview of the responsibilities of the financiers for this project.

Key findings

> *Nobody has come to me so far to ask about these things. You're the only one who has spoken in detail about our experiences. Who cares about the workers who work in the Gulf?*
>
> **Nepali worker at Sudair Solar PV Plant**

- Despite clear international standards calling for fair recruitment, all workers interviewed for this report were subjected to **labour rights violations during recruitment**, yet companies working on these projects failed to publicly commit to fair recruitment principles.
  - All workers were charged recruitment fees, leading to harmful psychological, financial and social impacts; no worker reported being reimbursed for these fees.
  - None of the project developers or construction and engineering companies working on the projects named in this report publicly committed to the Employer Pays Principle, the international standard for fair recruitment.
- Workers reported **unacceptable and egregious working conditions** across multiple renewables projects.
  - Low wages pushed migrants to work excessive hours to support families back home. On average, interviewees reported earning just over USD370 per month without overtime. The majority (19 of 20) worked unreasonable hours and over half worked seven days a week almost always or all the time.
  - Eighteen of 20 workers reported unsafe working conditions, most commonly extreme heat exposure (18 workers).
  - Workers faced severe restrictions on their freedom of movement. Only two said they could change job at any time without their employer's permission, despite much touted 2021 reforms establishing a government – facilitated job transfer process.
- Workers faced substantial **barriers accessing remedy** due to a culture of fear and severe reprisals for complaints.
  - No worker was asked about their working conditions directly by their employer or other external entity.
  - Around a third (11 of 34) of workers said they or their colleagues faced retaliation when they complained.
  - Protests were reported on four projects: in all cases apart from one, some or all protesting workers were dismissed and deported.
- Companies executing these projects are failing to conduct adequate human rights due diligence and include migrant workers as **key actors effecting the energy transition**.
  - Less than a third of project developers and construction and engineering contractors published a human rights policy aligned with international standards, or a supplier code of conduct that was mandatory and committed suppliers to respect the ILO Core Conventions on Fundamental Rights of Work.
  - Most project developers and construction or engineering contractors failed to publicly recognise migrants as an at-risk group, and none as a key stakeholder for engagement. No company committed to engaging in social dialogue with migrant workers on a just transition.
  - Environmental and social impact assessments of renewables projects named in this report, which should be approved by project financiers, fell short in identifying and addressing risks to migrant workers.

Companies linked to abusive projects must urgently address these risks. While many leading firms in the industry have made substantial progress on human rights commitments and practices globally, risks to migrant workers cannot be left behind. Just transition plans built through human rights protections, fair negotiations and creating shared prosperity should centre the experiences of this at-risk demographic.

This is more urgent now than ever before: across the world, migrant workers are increasingly recruited to fill labour shortages in the green economy, and abuses are already emerging in several regions outside the GCC. Companies operating in the industry must be alert to the heightened vulnerabilities of migrant workers and integrate the findings of this report into their due diligence processes worldwide.

COMPANIES LINKED TO RENEWABLES PROJECTS NAMED IN THIS REPORT[1]

Company role: F Financier PD Project developer CE Construction/engineering contractor

Company	Number of projects ↓
PD ACWA Power	5
F Mizuho Financial Group	5
F Riyad Bank	5
F Standard Chartered	5
F Banque Saudi Fransi	4
F HSBC	4
CE Larsen and Toubro	4
PD Public Investment Fund	4
F Saudi Awwal Bank	4
F Saudi National Bank	4
F Arab Petroleum Investments	2
F First Abu Dhabi Bank	2
F Korea Development Bank	2
PD Saudi Aramco	2
F Sumitomo Mitsui Financial Group	2
F Abu Dhabu Commercial Bank	1
PD Air Products	1
F Al Rajhi Bank	1
F Alimna Bank	1
CE Almajal Albilad Group	1
CE Archirodon	1

Company	Number of projects ↓
F Bank Al Bilad	1
F Bank Aljazira	1
F BNP Paribas	1
F Crédit Agricole	1
CE De Nora[2]	1
F DZ Bank	1
F Emirates NBD	1
CE Hitachi Energy	1
F JPMorgan Chase	1
F KfW	1
CE MAN Enterprise	1
F Mitsubishi UFJ Financial Group	1
F Natixis	1
PD NEOM	1
CE PowerChina	1
CE Saudi Services for Electro Mechanic Works	1
CE Saudi Electricity Company	1
CE SPG Steiner	1
F The Norinchukin Bank	1
CE Thyssenkrupp	1

1 Most migrant workers alleging abuse were employed, either directly or through subcontractors, in the supply chains of Larsen and Toubro and PowerChina. No workers interviewed for this report worked in the supply chains of other construction and engineering contractors in this list (Hitachi Energy, Saudi Services for Electro Mechanic Works, Saudi Electricity Company, Thyssennkrupp, De Nora, Archirodon, Almajal Albilad Group, MAN Enterprise, and SPG Steiner): these companies have been named due to their business connections to projects where abuses were identified, and hence their own exposure to risk. See chapter three for more.

2 De Nora has partnered with Thyssenkrupp in a joint venture that will "engineer and fabricate the plant based on their water electrolysis module." In its response to the Resource Centre, De Nora said it is "not involved in construction activities, nor does it act as an engineering contractor", and that it serves as a "technology supplier" in the joint venture.

Recommendations

The egregious abuse documented in this report should be of deep concern to the companies working on and financing these projects. It is crucial these companies ensure timely remediation for impacted migrant workers and improve their policies and practices to prevent these abuses from recurring.

To project developers and construction and engineering contractors:

- **Fair recruitment**
  - Commit to international standards aligning with the Employer Pays Principle, that employers and not workers should bear the costs of recruitment. Ensure timely remediation of fees charged to workers in line with best practice. Ensure workers are safeguarded from harm throughout.
  - Undertake labour migration process mapping to improve visibility of recruitment costs.
- **Value chain transparency and oversight**
  - Commit to increased transparency on business partnerships on projects, including disclosing the names of subcontractors and information on the processes used to award contracts, in line with EITI recommendations.
  - Adopt, publish, cascade and enforce binding supply chain standards to ensure labour standards are upheld across all operations and at every level of subcontracting.
- **Human rights due diligence**
  - Adopt a migrant worker-centred approach to human rights due diligence. Identify, prevent and mitigate key risks outlined in this report, including ensuring decent wages, safe conditions, reasonable working hours, the ability to change jobs, and access to remedy.
  - Ensure clarity of roles and responsibilities for respecting labour rights among consortia operations and business relationships reliant on subcontracting.
- **Access to remedy**
  - Commit to remediating worker abuse, in line with best practice and in consultation with migrant workers and their representatives. Ensure protection for migrant workers is prioritized throughout: amid this high-risk context, companies should use their leverage to work with contractors to remediate abuse rather than ending business relationships with contractors, which puts workers at risk of further harm.
  - Establish operational-level grievance mechanisms on projects that are accessible, legitimate, transparent, and in line with best practice.
- **Just transition**
  - Publicly support calls for the Saudi Arabian government to protect freedom of association and collective bargaining for migrant workers as a condition of doing business in the country.
  - Commit to social dialogue with trade union representatives (including relevant unions from origin countries and global union federations), migrant workers, diaspora groups, and civil society organisations as part of plans for the transition to renewable energy.

To financiers:

Human rights due diligence

- Adopt a migrant worker-centred approach to human rights due diligence to avoid financing projects that harm migrant workers. Ensure due diligence is in line with international best practice.
- Evaluate the quality of clients' risk assessments and ensure key risks to migrant workers are identified and addressed. Engage in periodic monitoring of projects to ensure adverse impacts are being managed, and to identify new risks.

Access to remedy

- Use collective leverage to engage with clients linked to the five projects named in this report to communicate expectations around remediation and to encourage them to engage in the remediation process in good faith.
- Monitor the extent of remediation and communicate consequences of failing to remediate, including impacts on possible future engagements. Engage with impacted migrant workers and worker representatives to ascertain whether remediation has been adequately delivered.

Just transition

- Publicly support calls for the Saudi Arabian government to protect freedom of association and collective bargaining for migrant workers as a condition of investing in the country.
- Assess the standards of stakeholder engagement on the just transition conducted by clients, including the extent to which migrant workers and their representatives are consulted as key stakeholders. Require clients to address shortcomings in stakeholder engagement and supplement with engagement conducted by the financial institution itself, including with migrant workers and worker representatives, and in line with best practice.

How this research was conducted

This briefing is based on interviews held with 34 migrant workers employed on renewables projects in Saudi Arabia since January 2024, including 31 Nepali and three Bangladeshi workers. Semi-structured interviews were held with 20 workers, and structured interviews with 14 workers (see interview questions in the Annex). Participants were identified through snowball sampling and testimony was analysed using deductive content analysis.

Interviewees were all male and aged between 22 and 45. The experiences of women migrants are therefore not included in this report's findings. Abuses were found on nine projects; four projects were not named due to the low number of workers interviewed on these projects and to protect workers from retaliation.

Key informant interviews (KIIs) were also held in July and August 2025 with four human rights organisations that specialise in migrant worker rights in the Gulf: Equidem, Ovibashi Karmi Unnayan Program (OKUP), Shramik Sanjal and IMA Research Foundation (Bangladesh). The report also analyses data from the Resource Centre's Gulf Energy Explorer: see our full methodology here.

Companies are named in this report and are included in the Gulf energy explorer if they have business connections to the five named projects, either individually or as part of joint ventures. Companies that are part of joint ventures are named individually to: (a) ensure each entity of the joint venture is visible and accountable; and (b) ensure the influence of companies operating in multiple distinct joint ventures are not underrepresented.

The Resource Centre invited all companies named in this report and linked to the five projects to respond. Their responses can be read in full here.

Mapping the renewable energy landscape and industry risks in Saudi Arabia

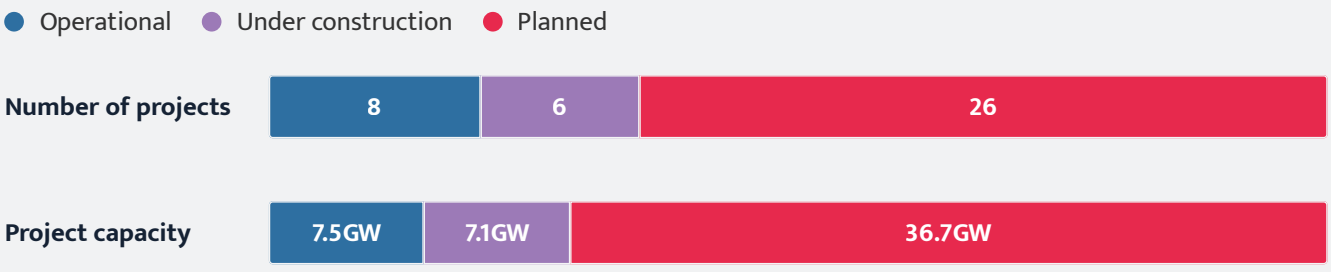
Tackling the climate emergency is a monumental global challenge in which companies and investors play a key role. The unprecedented roll-out of renewables must be fast, but not at the expense of the human rights of workers and communities. As highlighted in the Resource Centre's 2025 Renewable Energy and Human Rights Benchmark, wind and solar energy companies are continuing to improve their human rights policies and practices. However, while leaders are making significant strides across several saliant human rights risks, companies continue to lag in relation to ensuring respect for the rights of migrant workers in the industry.

This report considers the specific context of Saudi Arabia, the world's largest crude oil exporter and one of the world's biggest emitters of greenhouse gas. The notorious petrostate nevertheless has excellent renewable energy potential, with the industry having seen significant growth in the past decade. Targets to supply 50% of electricity through renewables by 2030 and reach net-zero by 2060 will require a considerable increase in renewables capacity, from the 7,500MW mapped by the Resource Centre (see below) in 2025, to around 58,000MW by the end of this decade.

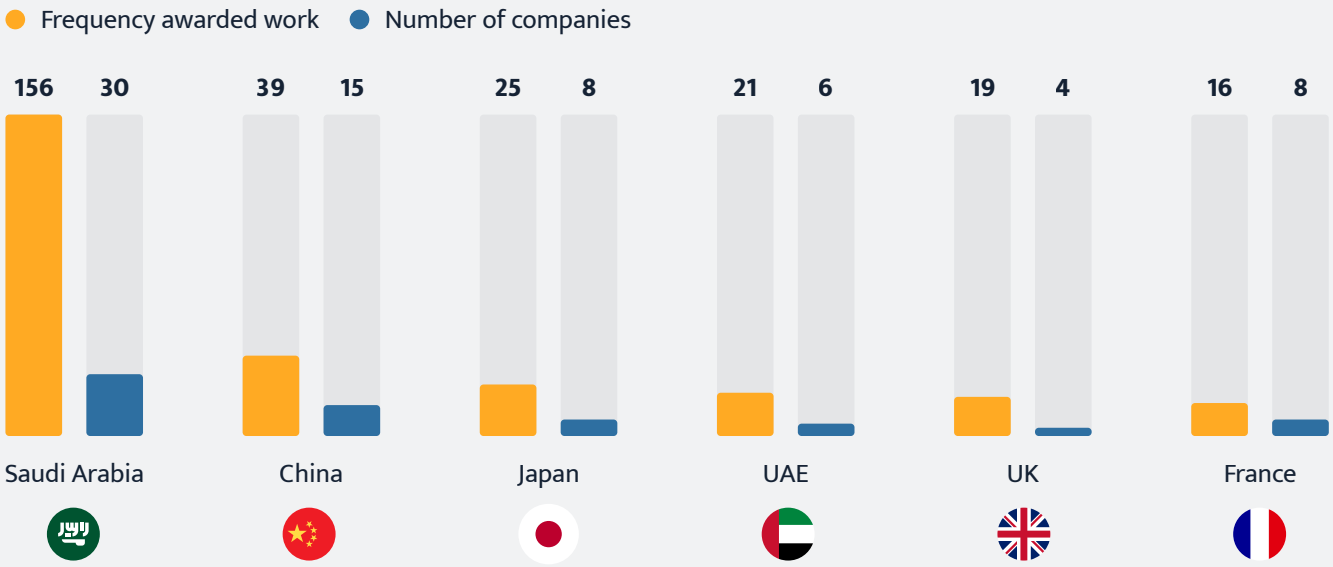
New projects mapped by the Resource Centre's Gulf energy explorer

The Resource Centre tracks solar, wind and green hydrogen projects in the GCC that are 100MW or larger and built since 2013 – and the companies behind them – through its Gulf energy explorer. Ninety-seven solar, wind and green hydrogen projects have been mapped across the GCC, linked to 213 companies. This data was analysed in the Resource Centre's 2024 briefing, which found many key stakeholders in the GCC fell woefully short across key human rights commitments, even as the industry expands at pace in the region.

PROJECTS BY PHASE IN SAUDI ARABIA



TOP COMPANY HQ COUNTRIES IN SAUDI ARABIA'S RENEWABLES INDUSTRY



Since 2024, seven new solar and wind projects with a total investment value of USD8.3 billion and one new green hydrogen project have been announced in Saudi Arabia, bringing the total number of projects mapped by the Resource Centre in the country to 40. Sixty-five percent of these projects are planned, showing **substantial potential increases** in renewable energy development in the coming years.

This growing industry provides companies worldwide with the opportunity to gain lucrative contracts. Since 2024, 17 companies have been awarded work on renewables projects in the country 52 times, bringing the total number of companies working in the country's industry to 108. Firms were awarded work in a range of roles, from project development to construction and engineering, supplying parts, project financing and professional services.

Monopsony at the top of project supply chains

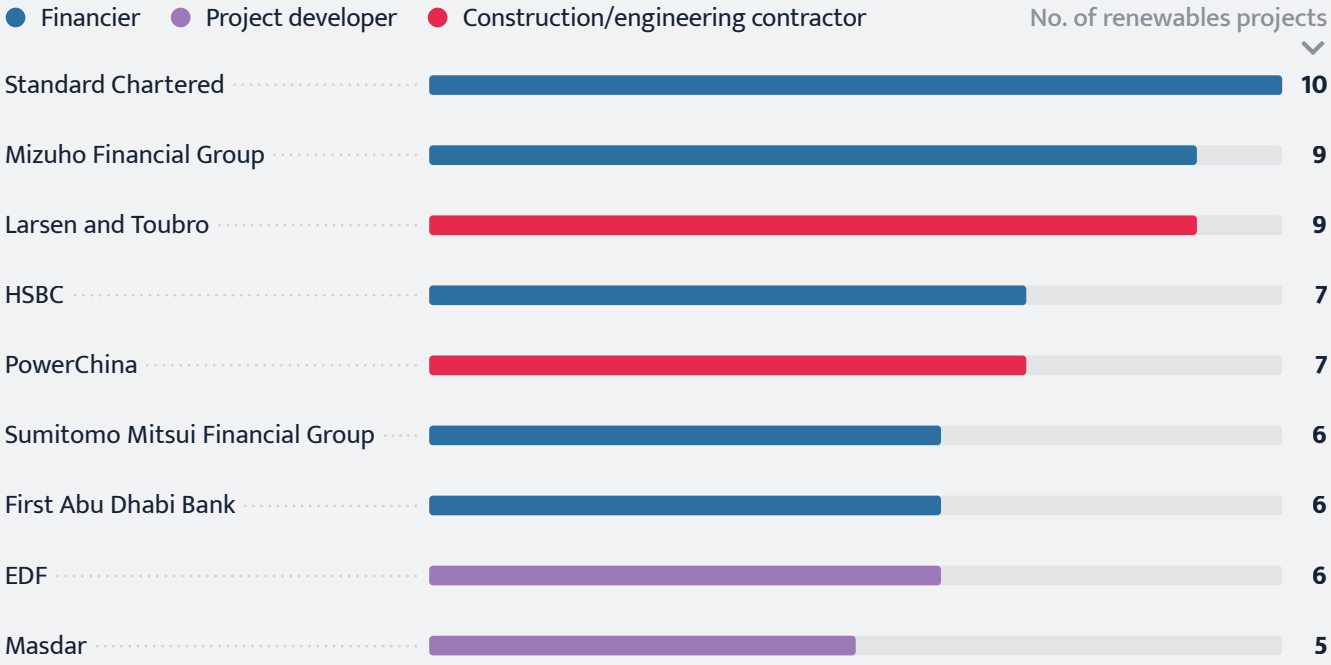
A small number of state-owned companies have secured the majority of project development contracts, often in joint ventures. This includes the **Public Investment Fund (PIF)**, the country's sovereign wealth fund which develops 40% of projects mapped by the Resource Centre in Saudi Arabia; **ACWA Power**, which develops 53% of projects mapped and is itself 50% owned by the PIF; and **Saudi Aramco**, which develops 30% of projects mapped and is majority state-owned.

The monopsony of state-owned firms at the top of the renewables supply chain limits the ability of investors to create change or conduct robust due diligence. This is particularly true of the PIF: research by Human Rights Watch has shown that under the Crown Prince Mohammed bin Salman, the PIF allegedly operates with little transparency, while companies it works with may be prevented from raising concerns about the firm, including through non-disparagement clauses. Amid these challenges, companies working in Saudi Arabia must commit to thorough due diligence – and refuse contractual terms that prevent them speaking out on human rights abuses.

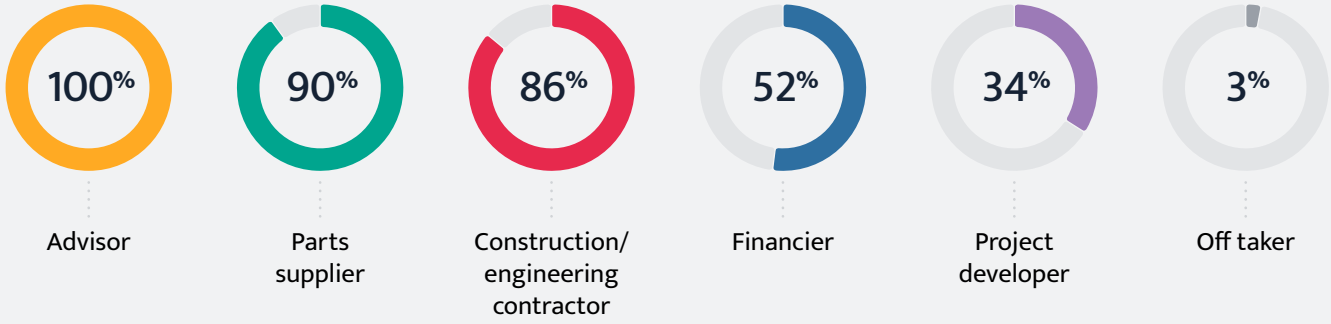
Opportunities for non-Saudi multinationals

While the top of the renewables supply chain is defined by state-owned firms, non-Saudi Arabia headquartered multinationals dominate other segments of the value chain. For example, 86% of construction and engineering work has been awarded to companies headquartered outside Saudi Arabia; all work granted to advisors has been awarded to non-Saudi Arabian companies; and the majority (52%) of financiers funding projects are headquartered outside Saudi Arabia.

TOP NON-SAUDI HEADQUARTERED COMPANIES AWARDED WORK IN SAUDI ARABIA'S RENEWABLES INDUSTRY



PERCENTAGE OF WORK AWARDED TO NON-SAUDI HEADQUARTERED COMPANIES



Structural risks to migrant workers in Saudi Arabia

Migrant workers across Saudi Arabia face systemic rights violations. Following the country's FIFA World Cup bid, human rights organisations and unions repeatedly highlighted unacceptable working conditions in the country. In November 2024, ITUC-Africa raised concerns over the "relentless exploitation" of African workers; in January 2025, Building and Wood Workers' International filed a landmark complaint alleging an "epidemic" of migrant abuse; and in July, trade unions from 36 countries filed a complaint with the International Labour Organization (ILO) calling for an inquiry into migrant rights violations.

Structural features of the country's **labour market** exacerbate the risk of abuse, and these issues surfaced throughout workers' testimonies:

- **The continued use of the Kafala** (employer-tied visa sponsorship) system perpetuates a power imbalance between migrants and employers which heightens vulnerability to abuse, including by stopping workers from freely changing jobs or leaving the country. Recent reforms claiming to allow some migrants to change jobs without their employer's permission do not go far enough. For example, migrants still rely on their employers to renew and cancel their residency (Iqama) permits, meaning workers fall into undocumented status through no fault of their own – an issue reported by numerous workers interviewed for this report.
- **Unions and protests are banned** in the Saudi Arabia, and only nationals are allowed to join worker committees. This curtails workers' ability to collectively protest poor conditions and enables companies to operate in a culture of impunity.

> *"The company delayed our salary… 200 workers complained about it, but seven workers were on the frontlines… The company people took photos and videos of them… those seven workers were taken to another worksite. Then… they were sent home.*
>
> **Nepali worker on Saudi solar project**

> *"Saudi Arabia feels like a jail. We're like prisoners. We're in the middle of the desert, with nowhere to go… It takes two to three hours by bus just to get to the market. They brought us here and dumped us in the desert.*
>
> **Nepali worker on Al Kahfah Solar PV Plant**

Several structural features **specific to the renewable energy industry** also exacerbate migrant workers' vulnerability and were highlighted throughout workers' interviews:

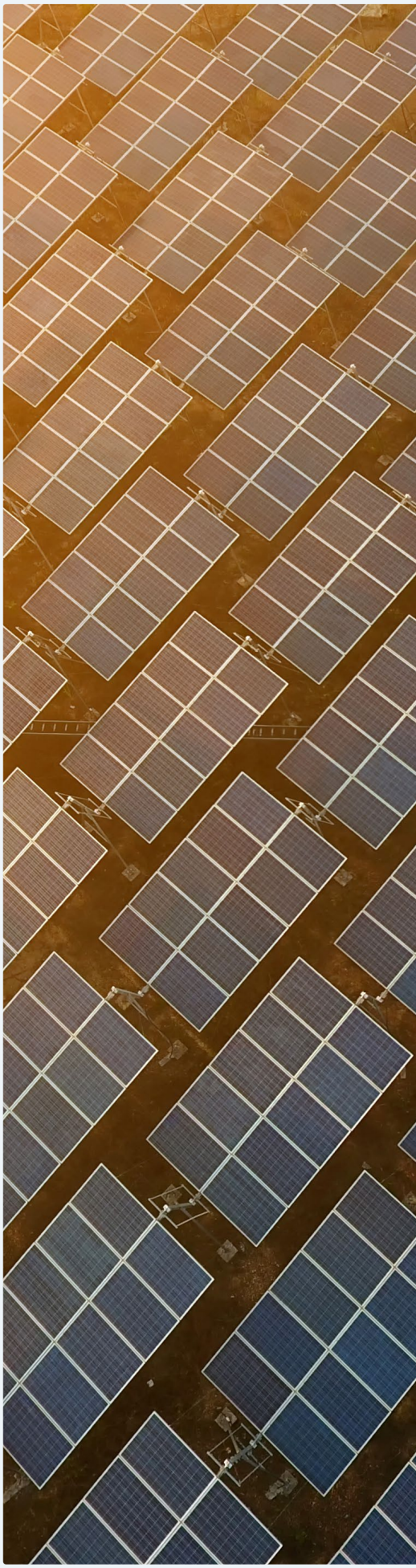
- **Isolation** enables projects to operate with limited scrutiny and makes it harder for workers to leave or report abusive conditions. Eight workers interviewed for this report highlighted difficulties going to urban areas on this basis.
- **High levels of subcontracting** obfuscates business relationships, diluting and obscuring accountability for abuse and externalising risks. At least 17 of the 34 workers interviewed for this report were employed by subcontractors, including at least two employed at the bottom of two layers of subcontracting.
- Workers were hired on a **temporary basis**. Interviewees worked on projects for around one year on average, with 20% leaving a project after less than six months, either to work on another or return home. Interviewees said this created job and income insecurity. Transitory workers are also less able to raise complaints and receive remedy.

The role of and risks to migrants in the global energy transition

While some of the human rights concerns highlighted in this report are specific to Saudi Arabia, many of the risks identified are relevant to **companies operating in the renewable energy industry globally**.

The significant growth of the renewables industry worldwide is generating critical labour shortages, and migration has been suggested by governments, industry groups, think tanks and inter-governmental organisations as a way to fill workforce gaps, including in the UK, Australia, Brazil, Europe and the USA. Companies around the world must be alert to the heightened vulnerabilities of the migrant workforces they increasingly rely on. The Resource Centre has already tracked multiple cases of migrant abuse in the renewables industry outside of Saudi Arabia, including in the UAE, the USA, Singapore, India, and Australia.

Saudi Arabia represents a jurisdiction where abuses in this industry are particularly acute; however, **if companies can address these risks here, then the benefits will be reaped worldwide**. In particular, companies must ensure industry growth is built on a private sector commitment to key fundamentals of a just energy transition so that companies, workers and communities can together benefit from this unprecedented industry shift through human rights and social protection, fair negotiations and shared prosperity.



Shared prosperity in the global energy transition

The concept of 'shared prosperity' in the energy transition reflects a need for a new economic system built on business models which centre on a fair distribution of benefits across supply chains, overturning the historical practice of concentrating power and wealth in the hands of a few.

In relation to migrant rights, the concept of shared prosperity in the energy transition is nascent. In 2025, **the Resource Centre and four civil society organisations who specialise in Nepali and Bangladeshi migrant worker rights in the Gulf identified key themes**, underpinned by insights from worker testimonies gathered for this report, including:

- **Shared prosperity as the redistribution of money:** Migrant workers are conducting hard and dangerous labour on renewables projects, yet are granted only a tiny percentage of profits. Instead, migrants' critical role in the industry should be recognised through increased wages that support decent living standards for them and their families.
- **Shared prosperity as the redistribution of power:** 'Prosperity' should go beyond a fiscal focus to include the redistribution of power along supply chains. This includes ensuring respect for freedom of association and collective bargaining; access to effective complaints mechanisms that protect workers from retaliation; and the provision of 'upskilling' training programmes which create new employment opportunities for workers, including by enabling workers to build livelihoods in the green economy after returning home. This redistribution of power also requires reforming temporary migration programmes to ensure workers can change jobs and return home when they wish, and creating pathways to residency and citizenship so that migrant workers can remain in the destination country if they choose.
- **Shared prosperity as the redistribution of risk:** Workers take on disproportionate risk in comparison to their employers and companies at the top of supply chains. Companies should ensure risks are not passed down supply chains onto workers, including by taking responsibility for safeguarding the rights of subcontracted workers. Migrants also take on significant risk due to a lack of access to social security. For example, workers should have access to insurance and compensation.

WHAT DOES SHARED PROSPERITY FOR MIGRANT WORKERS MEAN?

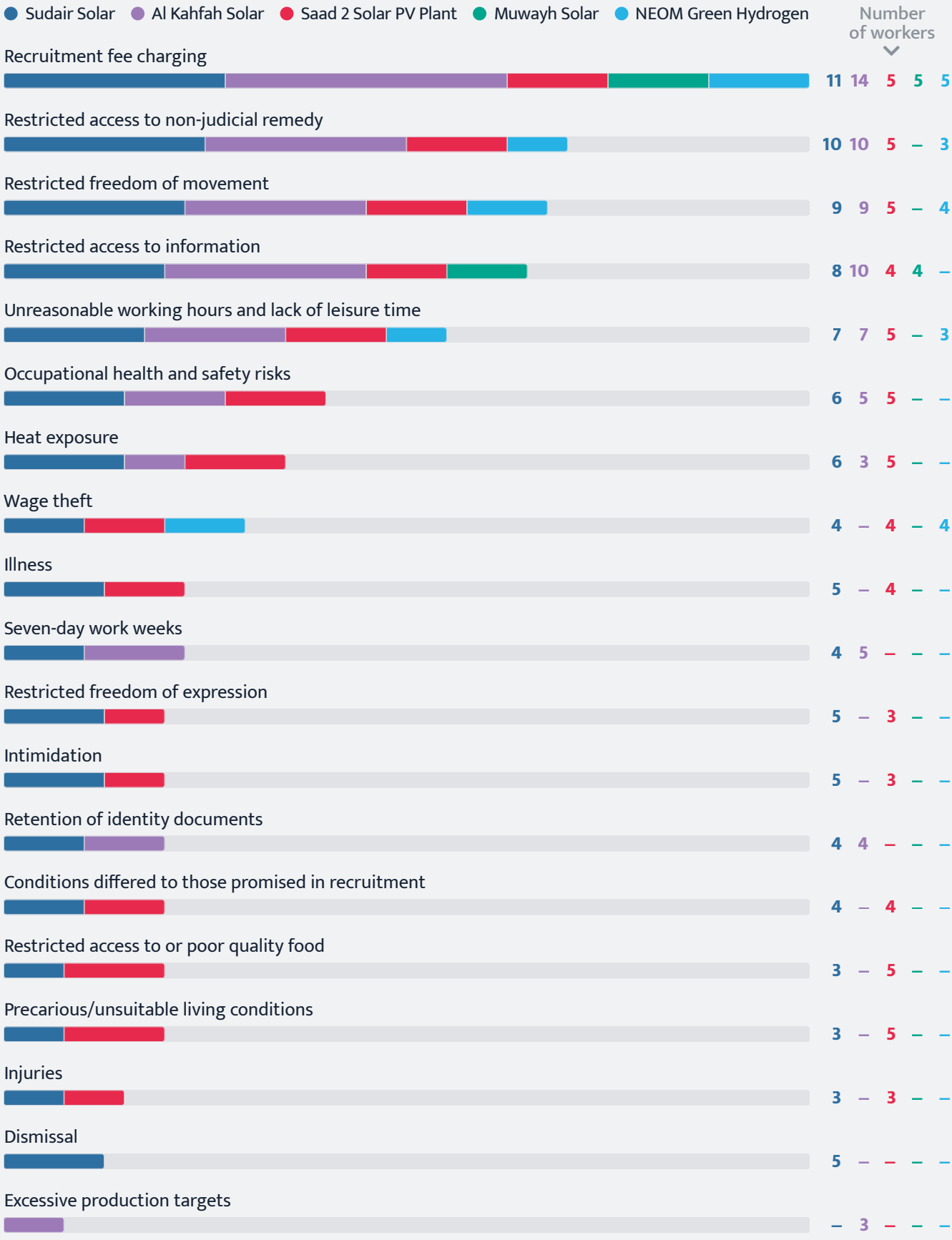
"It was like hell": allegations of abuse on renewables projects in Saudi Arabia

Given the lack of access to trade unions, severe limits on freedom of expression and the right to protest, and the isolation of worksites, the experiences of migrants on renewable energy projects in Saudi Arabia have remained largely hidden from external scrutiny. Interviews with **34 Nepali and Bangladeshi workers** employed on **nine renewables projects** in the country for this report shed light on the lived experience of these workers.

Human rights violations were identified across all nine projects, including unfair and abusive recruitment, low wages and unreasonable working hours, unsafe conditions, and a culture of fear, retaliation and corporate impunity. These violations were often egregious: over half (53%) of workers interviewed for this report experienced five or more indicators of forced labour, as defined by the ILO.

It is likely these abuses represent just the tip of the iceberg. While only 34 workers were interviewed, a high level of correlation between workers' experiences, both within and across projects, suggests abuse is widespread. Companies operating in the industry should urgently investigate, prevent and mitigate these risks, and provide timely remediation for abuse.

WHAT TYPES OF ABUSE ARE WORKERS REPORTING?



Abuses are only shown on the graph if three or more workers reported them; these findings therefore represent just the tip of the iceberg. Abuses are included if workers said they or their colleagues were subjected to the abuse.

PROJECTS WHERE MIGRANT WORKERS REPORT ABUSIVE CONDITIONS

NEOM Green Hydrogen Project

3,900MW capacity

5 workers interviewed

- **Project developers:** NEOM, Air Products, ACWA Power
- **Construction/engineering contractors:** Larsen & Toubro, De Nora, Hitachi Energy, Saudi Services for Electro Mechanic Works, Saudi Electricity Company, Thyssenkrupp, Archirodon, Almajal Alarabi, MAN Enterprise, SPG Steiner
- **Financiers:** Arab Petroleum Investments, First Abu Dhabi Bank, HSBC, Standard Chartered, Mitsubishi UFJ Financial Group, BNP Paribas, Abu Dhabi Commercial Bank, Natixis, Saudi Awwal Bank, KfW, Riyad Bank, The Norinchukin Bank, Banque Saudi Fransi, Alimna Bank, JPMorgan Chase, DZ Bank, Korea Development Bank, Crédit Agricole, Saudi National Bank, Sumitomo Mitsui Financial Group, Mizuho Financial Group

Al Kahfah Solar PV Plant

1,400MW capacity

14 workers interviewed

- **Project developers:** ACWA Power, Badeel (part of the PIF)
- **Construction/engineering contractor:** Larsen and Toubro
- **Financiers:** Banque Saudi Fransi, Mizuho Financial Group, Riyad Bank, Saudi National Bank, Standard Chartered, Saudi Awwal Bank, HSBC

Muwayh Solar PV Plant

2,000MW capacity

5 workers interviewed

- **Project developers:** ACWA Power, Badeel (part of the PIF), Saudi Aramco
- **Construction/engineering contractor:** Larsen and Toubro
- **Financiers:** Banque Saudi Fransi, Mizuho Financial Group, Riyad Bank, Saudi National Bank, Standard Chartered, Emirates NBD, First Abu Dhabi Bank, HSBC

Sudair Solar PV Plant

1,500MW capacity

11 workers interviewed

- **Project developers:** ACWA Power, Badeel (part of the PIF), Saudi Aramco
- **Construction/engineering contractor:** Larsen and Toubro
- **Financiers:** Al Rajhi Bank, Arab Petroleum Investments, Bank Al Bilad, Korea Development Bank, Mizuho Financial Group, Riyad Bank, Standard Chartered, Sumitomo Mitsui Financial Group, Saudi Awwal Bank, Bank Aljazira

Saad 2 Solar PV Plant

1,125MW capacity

5 workers interviewed

- **Project developers:** ACWA Power, Badeel (part of the PIF)
- **Construction/engineering contractor:** PowerChina
- **Financiers:** Banque Saudi Fransi, Mizuho Financial Group, Riyad Bank, Saudi National Bank, Standard Chartered, Saudi Awwal Bank, HSBC

Exploitative recruitment and extortionate fee charging

Recruitment fee charging is a key driver of exploitation. Workers are charged exorbitant fees by recruitment agencies, often under false promises of good employment conditions, putting workers at risk of debt bondage and conditions of forced labour.

International standards are clear: the costs of recruitment should be borne by the employer, not the worker (the Employer Pays Principle). This includes any fees or costs incurred during recruitment, including payments to labour recruiters and other related costs.

> *I knew that nobody would listen to workers like us. It's an open secret that everybody pays money to go abroad.*
>
> **Nepali worker employed at Al Kahfah and Sudair Solar PV Plants**

Alarmingly, all workers interviewed for this report were charged recruitment fees. Fees ranged from around USD500 to USD7,700, with workers paying over USD1,600 on average (more than four times the average basic monthly salary reported by interviewees).

Twenty of the 34 workers interviewed said they took out loans or borrowed from friends or family to cover recruitment costs. On average, workers took over a year to repay loans. Repayment was also exacerbated by high interest rates, which exceeded 30% in at least in four cases.

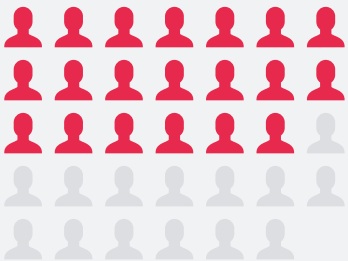
34/34 workers

were charged recruitment fees

0/34 workers

were reimbursed for recruitment fee charges

20/34 workers



took out loans/borrowed to cover recruitment costs

7/34 workers

were asked by their employer if they had been charged fees

The impact of recruitment charging

Fee charging had deleterious psychological, financial and social impacts, truncating the potential for migration to reduce poverty and exacerbating a cycle of abuse.

> *I had to pay the loan and interest too. Because of that, I couldn't spend all my earnings for my wife and children. My family couldn't eat and wear as they wanted. I couldn't educate my children well either. If I didn't have that loan, maybe I could have bought some land.*
>
> **Nepali construction worker at Al Kahfah and Sudair Solar PV Plants**

- Four workers highlighted adverse **impacts on their family** as loan repayments reduced remittances, limiting access to food, clothing and education at home. As one worker said, *"I couldn't pay my son's school fees on time...I bore a huge pressure and responsibility of providing money for my family and the money lenders."*
- Three workers said their debt meant they had to **work longer and harder**: *"It's very tough to take loans at high interest rates and pay them off. To pay the loan, we have to work hard and longer in the Gulf."*
- Four workers said debt and fee charging made them or their colleagues **afraid to raise complaints**. For example, one worker said, *"when the foremen scolded or threatened us, we complied silently. I felt anger inside, but I dared not express it. Losing my job was not an option since I had a loan to repay."*

A lack of transparency during recruitment

The ILO's international recruitment principles call for transparent recruitment channels, including access to accurate information regarding employment conditions.

However, over half (11 of 20) of workers reported arriving to conditions different to those promised during recruitment, including being employed by a subcontractor after being told they would be directly hired (six cases); and being assigned a different job (five cases), different hours (four cases), or lower wages (two cases) than initially promised.

> *The manpower agency deceived me. They told me, "It's a great company, and you'll earn good money." But when I saw the paperwork at the airport, I realised it was a supply company. If they had been honest and told me the truth, I wouldn't have come.*
>
> **Nepali Construction worker at Saad 2 Solar PV Plant**

No workers were provided with receipts for their recruitment payments. In five cases, workers were provided with fake receipts for only NPR10,000 (the maximum amount workers can be charged under Nepal's 2015 'Free Visa, Free Ticket' policy), despite being charged higher.

Barriers accessing fee reimbursement

In line with international standards and best practice, companies should prevent recruitment fee charging by implementing ethical recruitment systems; if fee charging is nevertheless identified in the supply chain, workers must be repaid.

Renewables companies and their contractors are failing to proactively investigate fee charging in their supply chain or provide reimbursement. Only seven of 34 workers were asked by their employer if they had been charged fees, and none reported being reimbursed. Four workers said their recruiter told them not to tell their employer they had been charged fees.

> *When I handed over the money, the agent instructed me, "Don't tell anyone that you paid me." They even recorded a video of me where I was made to say, "I only paid 10,000 rupees, nothing more."*
>
> **Nepali worker at Sudair Solar PV Plant**

Several workers emphasised the endemic nature of fee charging. One worker said, *"it's an open secret that everybody pays money to go abroad,"* while another said, *"everybody knows it's illegal, but everybody pays it."* This highlights the normalisation of this practice, suggesting renewables companies could be aware of this "open secret" yet are failing to tackle the issue.

Abusive employment conditions

Low wages and wage theft

International standards by the ILO call for workers to be paid adequate wages that support decent living standards for them and their families. Wages should also be paid in full and on time.

However, low wages and wage theft is a widespread issue for migrants in Saudi Arabia, despite labour reforms, including the creation of a Wage Protection System and wage insurance scheme. High levels of subcontracting exacerbate the issue, as pay-when-paid policies pass risks down supply chains, leaving migrants without pay, often for months.

> *When I came, I dreamt of earning money so the family members wouldn't have to struggle for their survival. I came here to make my future better. I'm trying my best from my side.*
>
> **Nepali construction worker at Al Kahfah Solar PV Project**

Over half of interviewees were subjected to wage theft (19 of 34 workers), including deductions for making mistakes, taking breaks, and the denial of end-of-service benefits, and – in one particularly shocking case – wage delays to explicitly stop workers from leaving.

Workers also struggled to earn enough. On average, interviewees reported earning just over USD370 per month, rising to around USD474 with overtime. Construction workers involved in 'general labourer' activities, such as pulling cables and digging ditches, earned the least (around USD250 without overtime). While migrant workers in Saudi Arabia have no guaranteed minimum wage, these salaries are considerably lower than the minimum wage for Saudi nationals (USD1,066). Low wages contrast with the profits made by the companies at the top of these supply chains. ACWA Power, for example, recorded a net profit of USD466 million in 2024.

> *I feel really bad when I see how little they pay for our work. A thousand riyals is nothing. Things are really expensive these days… the company has exploited us terribly. We are treated like hens, only valued for the eggs we lay.*
>
> **Nepali construction worker at Saad 2 Solar PV Project**

19/34 workers

subjected to wage theft

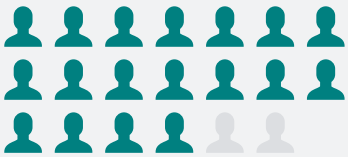
19/20 workers

worked unreasonable hours

11/20 workers

worked seven days a week all or most of the time

18/20 workers



reported unsafe working conditions

These conditions of acute inequality could not be further from an energy transition based on 'shared prosperity' and the fair distribution of benefits across supply chains (see more above). Low wages are particularly concerning as all workers interviewed for this report who were asked about their motivations to move to Saudi Arabia said they were pushed to migrate out of financial necessity. Denying fair wages not only fails to recognise the importance of these workers in the energy transition; it also denies these workers – and their families – a means to escape poverty. As one worker notes, *"money is essential. Without it, we have no life."*

Unreasonable working hours and excessive production targets

The ILO recommends limiting working hours to eight hours per day and 48 hours per week.

However, the majority (19/20) of interviewees reported working beyond this limit. Most (11/20) reported mandatory 10-hour workdays, and six reported working regular hours longer than ten-hour workdays. Two logistics workers described the longest hours, including regular 11- or 12-hour days and occasional shifts of up to 22 hours.

Twelve of 20 interviewees said they worked without a weekly day off, with the majority (11) working without a day off almost always or all the time. While excessive overtime was not explicitly mandatory, low wages implicitly made it so as workers were driven to continue working by financial necessity. Eight workers said they worked long hours to increase their income. For example, one worker said he *"cannot save any money if [he] work[s] for regular hours only"* and that it is not his *"choice to work overtime,"* while another said workers must work in the midday heat to earn enough.

> *They all pressure us to work. They say it frequently. "Quickly. Quickly"... some say, "Jaldi, Jaldi."*
>
> **Nepali logistics worker at Saad 2 Solar PV Plant**

Seven workers also said their employer pressured them to work excessively. For example, one interviewee said he and his colleagues were punished if they did not drag 2,000 metres of cables daily by being denied overtime.

Occupational health and safety violations

> *At [Al Kahfah Solar PV Project], I worked in the extreme heat. I checked the temperature on my mobile phone, and once it was 51 degrees. I continued working in that heat.*
>
> **Nepali construction worker**

A safe working environment is one of the ILO's fundamental principles and rights at work.

However, 18 of 20 workers reported unsafe working conditions, including:

- **Extreme weather**, including heat exposure (18 workers), intense cold (eight), and dust storms (four). Interviewees laboured in over 50 degrees Celsius in summer, and in winter, workers' fingers would *"go numb, and [their] body trembles with cold."* Ten workers said the company denied workers adequate clothing in winter or/and sufficient water, shaded areas or breaks in summer.
- **Hard labour** (five workers). Several workers said production targets were prioritised over safety. One safety supervisor said, *"company management ...controls the department of safety... the company management has a pressure to complete work so they force the workers [to work]. It means the workers safety is compromised."* Another worker said, *"outwardly, the employer maintained a formal appearance by showcasing various initiatives... However, in reality, the primary focus remained on productivity."*
- "Infestations" of **snakes and scorpions** (seven workers).
- Safety concerns from the use of **machinery or vehicles** (five workers).

> *Another major hazard at the solar plant is the presence of snakes and scorpions. Some of them are highly venomous, and if bitten without immediate medical attention, death can occur within 30 minutes.*
>
> **Nepali logistics worker at Saad 2 Solar PV Project**

These hazards led to injuries, illness and death. Fifteen of 34 workers said they or their colleagues were injured or became ill at work, including workers fainting and bleeding after heat exposure; losing limbs from vehicle collisions; and being hospitalised from snake bites. One worker said he saw seven workers fainting due to the heat and 16 workers injured over two years at two solar sites. Six migrant deaths were also reported by interviewees, including two suicides by Indian workers at the labour camp of a project not named in this report, and the death of a worker from a suspected heart attack after heat exposure at NEOM Green Hydrogen Project. This follows wider reports of migrant worker deaths at NEOM mega-city from other human rights organisations.

> *A dust storm was blowing, and work should have been stopped. However, the foreman forced a JCB machine operator to continue working. Due to the dust, the operator did not see a [Nepali] flagman standing nearby and accidentally ran over his legs with the JCB. He lost both legs.*
>
> **Nepali worker at NEOM Green Hydrogen plant**

Several workers spoke positively about accessing treatment following workplace injuries or illness, including due to the presence of medical clinics and doctors at worksites, and to health expenses being reimbursed by employers. However, six workers described a lack of access to sufficient treatment, including companies refusing to take workers to hospital and workers being dismissed after injuries.

Restricted freedom of movement and poor living conditions

Poor living conditions

In line with international standards, workers should have access to adequate and decent housing and a suitable living environment, including the provision of adequate furniture for workers to secure belongings and reasonable access to communication, such as phone signal.

Interviewed workers reported living in a range of employer-provided accommodation, from guesthouses to temporary "container-like" camps. Over half (13 of 20) described unsuitable accommodation:

- Thirteen workers described poor quality food and four described a lack of access to water. One worker said the food was *"comparable to what people feed cattle."* Three interviewees said they would be fined if they cooked their own food, suggesting a living environment defined by control and punitive treatment.
- Four workers described a lack of space, including one worker who shared a room with 12 others without enough space to keep belongings.
- Three workers described a lack of internet or mobile service, and eight workers described isolated accommodation.

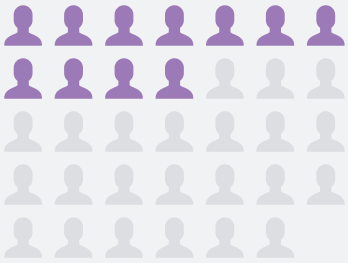
> *Nobody wants to work for [our] company. It doesn't treat workers like humans. It provides the worst quality of food. Its accommodation is beyond words.*
>
> **Nepali construction worker at Saad 2 Solar PV Plant**

Not all workers felt their accommodation was poor: when asked, four workers did not raise any issues with their accommodation and four workers described accommodation in positive terms. In particular, living conditions varied by role. For example, one worker said, *"labourers get one type of food, engineers get another, and [foremen] receive a different kind."*

13/20 workers

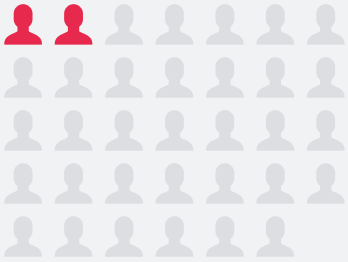
described unsuitable living conditions

11/34 workers



reported restricted freedom of movement at their accommodation due to curfews

2/34 workers



workers said they could change job without their employer's permission

Some workers said they felt this was unfair, as renewables projects depend on and profit from the labour of low-wage general labourers as much as workers in other roles. In the words of one worker, *"labourers are the foundation of these projects, the ones who turn difficult plans into reality through their hard work. Yet, they are subjected to such unfair treatment."*

Restricted freedom of movement

International guidelines state migrants should enjoy freedom of movement beyond their workplace and accommodation, including entering and exiting living spaces at any time. Workers should also have possession of their personal documents and should be free to change employer or to return home when they wish.

Eleven of 20 interviewees described restricted freedom of movement at their accommodation. Eleven workers reported evening curfews, and eight workers said they or their colleagues struggled to leave accommodation or travel to nearby cities due to a lack of transport and isolation.

While the majority (13 of 20) of workers had access to their passports, only two of 34 workers – both on 'free visas' – said they were able to change jobs at any time without permission from their employer.

This is despite 2021 reforms that granted migrants who have been in the country for one year the right to change job without their employer's permission, by accepting alternative job offers through the Saudi Ministry of Human Resources and Development's online platform. Most interviewees were unaware of the Ministry's transfer process. The six workers who were aware of the process said it was not used due to a lack of understanding of the system, a lack of the required documentation, and a lack of implementation.

Barriers accessing remedy

International standards are clear: when companies have caused or contributed to adverse impacts, they should provide for and cooperate in remediation.

However, interviewees conveyed a culture of corporate impunity, enabled by a lack of adequate grievance mechanisms that they know about, trust and can use, and retaliation for raising complaints.

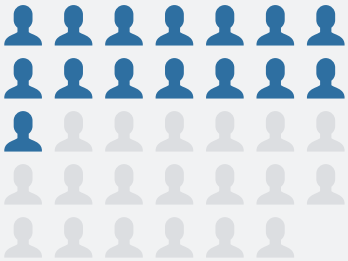
Fifteen of 34 workers said they did not know of a formal complaints process beyond speaking directly with company staff. While eight workers described a complaints box and one worker a QR code for submitting complaints, half said the complaints boxes or QR code were not used, including due to fear of retaliation and belief nothing would come from raising a complaint. One worker said the complaints box was below a camera, and the company would check the footage and target complainants.

> *Complaining about working and living conditions is hard in the Gulf. What could we do if they sent us back home? Many of us had taken loans to secure those jobs, so being sent home was a frightening prospect.*
>
> **Nepali construction worker at Al Kahfah Solar PV Plant and Sudair Solar PV Plant**

Six workers said they or their colleagues did not raise complaints due to fear of retaliation. This fear was not misplaced: around a third (11 of 34) of workers said they or their colleagues faced retaliation when they complained, including ten cases of workers or their colleagues being dismissed after raising complaints, and two cases of workers being subjected to threats for raising complaints. In the words of one interviewee: *"workers were afraid to speak the truth. If someone spoke the truth about the company, he would be fired."* Only four of the 17 workers who said they or their colleagues raised a complaint said the complaint was resolved.

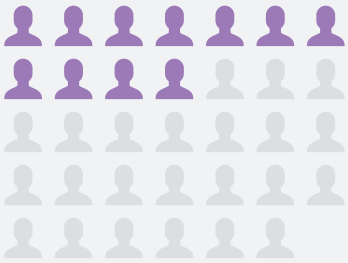
> *About five or six [Nepali workers] complained about [working in the heat] to the foreman. After that, there was a quarrel between them… Then they were sent back home.*
>
> **Nepali construction worker at Sudair Solar PV Plant**

15/34 workers



did not know of a formal complaints process beyond speaking directly with company staff

11/34 workers



said they or their colleagues faced retaliation for raising complaints

0/34 workers

were asked about their working conditions by an employer or other external entity

Companies across the supply chain appear to have failed to conduct proactive investigations into working conditions. No worker was asked about their working conditions directly by an external entity or their employer. Further, while five workers described accommodation or worksite inspections, four said the inspections were insufficient, including due to the company improving conditions prior to the inspection and then conditions returning to their previous level after, showing how audits are not fit for purpose.

> *[Audit] agencies pre informed about their visit to the company. So, the company would prepare to comply with every rule and regulation. The company would stop risky work during the visit of auditors… all these audits are phony.*
>
> **Nepali worker at Saudi Arabian solar project**

Company spotlight: baseline assessment of human rights commitments

It is the responsibility of companies to ensure the rights of migrants in their supply chain are respected. This section investigates the extent to which three key actors in the renewables value chain are engaging with the challenge in Saudi Arabia: **project developers**, **construction and engineering contractors**, and **financiers**.

Project developers and construction/engineering contractors: policy analysis

Sixty-two companies have business connections to the five projects named in this report, including project developers, construction contractors, financiers, off-takers, suppliers and professional service providers.

Sixteen companies were selected for a baseline policy assessment on the basis that they are either a project developer or construction or engineering contractor on one of the five projects (see full methodology in the Annex).

Seven of the 16 companies selected for this baseline assessment were linked to abuse through supply chain connections:

- **ACWA Power**, the **PIF**, **Saudi Aramco**, **NEOM** and **Air Products** are developers on at least one of the five projects. These companies selected construction and engineering contractors, **Larsen and Toubro** and/or **PowerChina**, to construct elements of the renewables projects, which then employed migrant workers – either directly or through multiple layers of at least 11 subcontractors – in abusive working conditions. Most (over two-thirds) of the workers interviewed for this report were employed in the supply chain of Larsen and Toubro.

Nine of the 16 companies selected for this assessment were working on at least one of the projects, but abuses were not identified in their own supply chain. However, their presence on the projects underlines their own exposure to risk, hence their inclusion in this assessment:

- **Saudi Electricity Company** and **NEOM** contracted **Hitachi Energy** and **Saudi Services for Electro Mechanic Works** to develop NEOM's energy transmission system; **SPG Steiner** and local partners **MAN Enterprise** and **Almajal Alarabi Group** were contracted to construct ammonia storage tanks at NEOM; **Thyssenkrupp** and **De Nora** partnered in a joint venture to engineer and maintain NEOM's water electrolysis modules; and **Archirodon** is building an ammonia jetty at NEOM.

A policy assessment using the same metrics was conducted in 2024 by the Resource Centre against 27 companies, including seven of the companies included in this analysis. While some companies have improved in comparison to their score last year – including Larsen and Toubro – it is concerning that **many companies still fall woefully short** in their policy commitments.

Human rights policy and commitments

As a foundational step, companies should express their commitment to human rights through a public statement or policy in line with United Nations Guiding Principles.

- Only five of the 16 companies published a publicly available human rights policy aligned with international standards, including the ILO Core Conventions on Fundamental Rights at Work.
- Only three of the 16 companies – **Hitachi Energy**, **De Nora** and **NEOM** – recognised risks specific to migrant workers in their suite of human rights policies.
- Only eight of the 16 companies outlined how they conduct risk assessments to monitor labour rights risks in their own operations and their supply chains, including through audits, certifications, and stakeholder engagement with NGOs. None said they would engage with migrant workers as affected stakeholders to identify salient risks, in line with best practice.
- No company committed to both elements of the Employer Pays Principle: that (a) no worker should pay for a job; and (b) the costs of recruitment are borne by the employer. Only one company – **Hitachi Energy** – said employers are responsible for paying recruitment costs.

Identifying supply chain risks

Companies should prevent and mitigate adverse impacts not only in their own operations, but also at business partners and companies operating beyond Tier 1, in line with international standards. The publication of a robust, mandatory supplier code of conduct is a first step.

- Only five of the 16 companies had a publicly available supplier code of conduct that was mandatory and committed suppliers to respect the ILO Core Conventions on Fundamental Rights at Work. Several companies conveyed supplier human rights standards as 'expectations' or 'encouragements', rather than obligatory requirements. Stronger language is needed ensuring respect for human rights is a prerequisite for any business relationship.
- All five supplier codes of conduct in line with international standards required first-tier suppliers to cascade the human rights standards down the supply chain. However, no company evidenced the mechanisms used to flow standards down the supply chain, such as through capacity building trainings or consultations.

Stakeholder engagement

The energy transition cannot be just unless companies engage in meaningful and effective social dialogue with workers and their representatives.

- Only five of the 16 companies had a policy requiring respect for freedom of association in its operations or supply chains, and only four companies prohibited anti-union discrimination.
- Only five companies reported working with local or global trade unions to support collective worker empowerment.
- No company identified migrant workers or their representatives as a priority for engagement.
- No company committed to engaging in social dialogue with unions or migrant workers on a just transition.

Better practice: **Thyssenkrupp** was the only company that has entered into a Global Framework Agreement with a global union (IndustriAll Global Union) that covers its supply chains. For multinational companies, Global Framework Agreements are vital in helping to protect workers across jurisdictions.

As noted above, workers in Saudi Arabia face dismissal, arrest and deportation for union activities. Companies operating in this jurisdiction should address the gap between international standards and the reality on the ground. This includes, as a first step, recognising and respecting the right for workers to join equivalent worker bodies where union rights are restricted under law.

- Only one company – **Hitachi Energy** – had a policy requiring respect for the right of workers to join equivalent bodies when freedom of association is restricted under law.
- No companies committed to engaging with alterative worker bodies on a just transition when freedom of association is restricted under law.

Better practice: **Hitachi Energy**'s Supplier Sustainability Manual requires its suppliers to ensure freedom of association and collective bargaining, and to ensure workers understand their rights, including the right to strike. It also requires suppliers enter negotiations in good faith, protect union members from discrimination, and provide for alternative forms of worker dialogue when freedom of association is legally restricted.

Notably, some companies performed better in their policy commitments, while others were clear laggards. **Hitachi Energy** had the most comprehensive policies, meeting 12 of the 18 criteria assessed, followed by **Thyssenkrupp** and **De Nora**, which met ten. In contrast, seven companies – the **PIF**, **Saudi Services for Electro Mechanic Works**, **Archirodon**, **SPG Steiner**, **Almajal Alarabi Group**, **MAN Enterprise** and **PowerChina** – met none of the criteria.

Laggards must urgently improve their policy commitments in line with best practice, and companies which performed better must mitigate additional risk exposure that comes from working with – or on the same projects as – laggard firms, including by making their policies more robust in line with this report's recommendations, encouraging a race to the top in migrant worker-centred human rights due diligence. All companies must also ensure their policies are put into practice throughout their operations and business relationships.

Project financiers: role and responsibilities

Worldwide, investors are increasingly expected to finance projects that help reduce global warming. However, financiers must also ensure they manage and mitigate human rights risks in these investments and across their portfolios.

We identified 25 financiers which provided project financing to the five projects named in this report, including international and local banks (see full list here). This includes 11 banks which financed more than one of the five projects: **Standard Chartered**, **Riyad Bank** and **Mizuho Financial Group** (financed all five projects); **Banque Saudi Fransi**, **Saudi National Bank**, **HSBC** and **Saudi Awwal Bank** (financed four projects); and **Sumitomo Mitsui Financial Group**, **Arab Petroleum Investments**, **First Abu Dhabi Bank** and **Korea Development Bank** (financed two projects).

Project finance due diligence in line with international standards

Financiers cannot rely solely on clients to conduct human rights due diligence, but must themselves ensure financing flows to projects that respect the rights of workers, including migrants, in line with international standards.

Twelve of the 25 financiers are also signatories of the Equator Principles – a risk management framework used by financiers to identify and manage environmental and social impacts of projects. The ten principles cover a range of commitments, including conducting environmental and social risk assessments, developing risk management systems, transparency and stakeholder engagement. The abuses documented in this report should serve as a wake-up call to financiers, including Equator Principles signatories, who must urgently assess their due diligence processes and ensure that migrant workers do not continue to fall through the gaps.

ESIA Assessments

The Equator Principles and OECD guidelines call for financiers to evaluate the quality of a project's risk assessments, including by conducting a gap analysis of the assessment where necessary. At a minimum, this includes ensuring the assessment is accessible and available online and is to the financier's satisfaction. For high-risk projects, this should include an Environmental and Social Impact Assessment (ESIA).

ESIAs were publicly available for four of the five projects named in this report, and addendums were also available for four projects, as project financiers identified gaps in the initial ESIAs. However, only two ESIAs or addendums identified migrants as an at-risk group. Key risks were also missing: for example, no ESIA or addendum mentioned recruitment fee charging as a risk. Financiers must ensure risks to migrant workers are identified and managed when they evaluate the quality of ESIA assessments.

As financiers are directly linked to the projects where abuse has been identified, they should **use their leverage** to ensure clients provide timely remediation to workers. Financiers that provide loans in consortiums with other banks should **work together** to create joint leverage over borrowers, including by jointly communicating with project developers and cooperating to monitor the extent to which the client has remediated workers.

Conclusion

Migrant workers interviewed for this report allege a range of severe and unacceptable labour rights violations on renewable projects in Saudi Arabia. These abuses create conditions of **alarming dehumanisation**, where workers are treated as "machines", not humans, and are denied basic human rights.

> *I request those who are thinking of going to Saudi, please don't go to work for supply companies. It doesn't treat you like a human.*
>
> **Nepali construction worker at Saad 2 Solar PV Plant**

Companies across the supply chain must urgently **investigate, prevent and mitigate** these adverse and egregious rights risks, and provide **timely remediation**. Project developers and construction and engineering contractors at the top of supply chains have the responsibility and leverage to effect change. Financiers should also use their leverage to ensure clients remediate workers for the abuses documented in this report.

There is no time to delay: the transition to renewables is an immense opportunity for business; but it is also a colossal responsibility. Rightsholders must be respected and centralised in transition plants – including the rights of migrant workers, upon whose labour the transition depends.

Annex: Methodology

This briefing is based on interview data held with 34 migrant workers employed on renewables projects in Saudi Arabia since January 2024, including 31 Nepali and three Bangladeshi workers. Semi-structured interviews were held with 20 workers, and structured interviews with 14 workers (see interview questions below). Interviews were held in two phases between November 2024 and July 2025.

Participants were identified through snowball sampling and testimony was analysed using deductive content analysis.

The majority of interviewees (21) worked in construction; six worked in logistics, three in cleaning and maintenance, three in office jobs, and three in security. Two migrant supervisors were also interviewed. Interviewees were all male and aged between 22 and 45. The experiences of women migrants are therefore not included in this report's findings.

Key informant interviews (KIIs) were also held in July and August 2025 with four human rights organisations that specialise in migrant worker rights in the Gulf. KII findings informed the analysis of worker interview data and the development of the concept of 'shared prosperity' in relation to migrant rights.

The report also analyses data from the Resource Centre's Gulf energy explorer: see our full methodology for the explorer here.

Companies are named in the report, and are included in the Gulf energy explorer, if they are individually linked to projects or if they are part of joint ventures. The role of the company is defined by the wider role of the joint venture.

Interview questions

Twenty interviewees were asked all questions. An additional 14 interviewees were asked a streamlined set of questions, marked with an asterisk.

- *What were your motivations moving to the Gulf? What did you hope to find?*
- *Were there events back home that persuaded you to move (i.e., loss of livelihoods, extreme weather events)?*
- *Can you explain the process of how you got the job?*
- *If directly employed, did you speak directly with HR staff at the employing company or with another person (middleman) to get your job?*
- * *Did you pay any fee or incur any other costs to secure your job?*
- * *If yes, how much and who did you pay it to?*
- * *[Prompt again on costs] Did you incur any other costs (e.g., airfare, admin, travel, visa, notarising, uniform cost, informal payment)?*
- *Do you have documentation of the payment?*
- * *Did you take out a loan/borrow from friends and family to be able to pay the recruitment fees?*
- *Have you paid back the loan yet? If not, how long do you estimate that taking?*
- *What has the impact of taking the loan been on you and your family, would you take one again?*
- * *Did your employer/place of work ask whether you paid a recruitment fee? If so, do you remember what they asked?*
- * *Have you been reimbursed?*
- *If you paid a fee but did not disclose doing so, why did you not feel able to?*
- *How did you find your time working in Saudi Arabia? How do you feel you were treated by your employer/manager?*
- *Were you directly employed or subcontracted/supplied/deployed via a third party?*

- *Did the employment terms/job role match what was promised to you at the time of recruitment? If not, how so?*
- *What monthly wage did you expect to receive?*
- *Did you receive it in full?*
- *If not, did you receive partial wages, how much? If you experienced deductions, what reason was given?*
- *If not, by how many months were the wages delayed?*
- *Did you receive overtime pay?*
- *Did all workers at the workplace receive the same wages?*
- *If not, do you know how this compares with other workers of different nationalities and between directly employed and subcontracted workers?*
- *How long were shifts and how many times did you work overtime?*
- *How many hours a week did you work and what rest days did you get?*
- *Did you observe any differences between how workers of different nationalities/genders were treated?*
- *Did you receive all end of service benefits you expected to?*
- *Did an external person or a person from your employer ever conduct an interview with you during your employment to check you were being paid and treated correctly? If so, did you feel able to share honest answers?*
- *Did the workplace provide accommodation? If so, how would you describe it?*
- *Were you/other workers at the company under a curfew? If so, was this dictated by gender/nationality?*
- *Were their restrictions on where you could go outside of accommodation? Were these practical (e.g., no transport options, expensive transport) or literal (e.g., were accommodation sites secured/locked)?*
- *Did you have any concerns about being able to carry out your duties safely?*
- *Did you or anyone in their company suffer an injury or illness as a result of their work?*
- *If yes, what have the lasting impacts of the injury/illness been? Are you/your colleagues back to work as normal now?*
- *If yes, what was your/their experience of receiving the healthcare you needed?*
- *Did your role involve outside work?*
- *If yes, how were you protected from the heat while at work?*
- *Are you aware of any standards in Saudi Arabia or on the project that are meant to protect workers from the heat?*
- *Did you have unrestricted access to your passport/other identity documents?*
- *Were you able to change jobs at any time?*
- *Are you aware of other workers requesting to change jobs through the Ministry of Labour sponsorship transfer process?*
- *Are there any other requirements a worker has to fulfil before they can change jobs? What are they (e.g., requiring a resignation letter)?*
- *If workers wanted to raise a complaint or issue at work, how could you do this? Do you know anyone who raised a complaint?*
- *If yes, how did they do this and what was the outcome? Was there a formal process for dealing with worker complaints?*
- *If no, do you know why no one had complained?*
- *Did any workers face retaliation if they complained?*
- *Did your place of work have a worker committee that could be used to communicate with management? If so, can you explain the role or purpose of this committee?*
- *If so, how are worker representatives selected? Were outsourced workers represented?*
- *If you have already returned, would you migrate again to Saudi Arabia or to the broader Gulf?*
- *What would you say to anyone else looking for a job in Saudi Arabia?*
- *Is there anything else they would like to discuss?*

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Business & Human Rights Resource Centre is an international NGO which tracks the human rights impacts of over 10,000 companies in over 180 countries, making information available on our 10-language website.

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