

**2021 Questions for Hotel Companies**  
**Migrant Worker Rights**

**Please complete the questions on your company's operations in Qatar. For all answers please ensure you provide as much evidence as possible and links to all policies referenced if publicly available.**

**Scope of operations**

- Please describe the scope and structure of your company's operations in Qatar 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	BANANA ISLAND RESORT DOHA BY ANANTARA	MANAGED	AL RAYYAN PROJECTS MANAGEMENT
2			
3			
4			
5			

**Workforce data**

- Please complete the table below with workforce data.

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed				
Employed by property owner	434	372	62	Indian, Bangladeshi, Filipino, Sri Lankan, Nepali, Indonesian, Kenyan, Tunisian, Ugandan, Moroccan, etc.
Employed by subcontractors (e.g. service providers or labour suppliers) we only have casual or contractors	119	115	4	Indian, Bangladeshi, Nepali, etc.
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)				

If the exact breakdown is not available, please provide a % estimate of workers employed directly and those subcontracted.

- Please complete the table below with labour supply data.

No.	Labour supply company	Nature of work eg. Cleaning, housekeeping, security	Total number of people
1	Group Security System Certis International	Security	28
2	Home Care Center	Clinical nursing	2

3	Al Mukhtar cleaning - Pest Control	Pest Control	4
4	Qatar Factory - Fire Alarm System and Fire Fighting	Security	2
5	Al Rayyan Pool - Swimming Pool	Cleaning	9
6	Power gas - LPG maintenance contract	Maintenance	1
7	Water Master - RO Plant & STP	Maintenance	16
8	Palmera - Landscape	Gardening	26
9	Integra - Generator & Power distribution	Maintenance	8
10	Al Kuwari - Waste management	Maintenance	2
11	PEO contractor - Chalet Villa Wooden floor repairing	Maintenance	13
12	ABES Gulf Marine Services	Activities	3
13	Alghais Marine Equipment	Activities	3
14	Al Ahmadani Medical Services	Retail Store	1
15	Al Bawara Trading	Retail Store	1

If the exact breakdown is not available, please provide % estimate of workers provided by each company.

### Human rights and due diligence

4. Does your company have a publicly available policy commitment to respect human rights in its operations and throughout its business relationships which specifically addresses workers' rights and references relevant human rights standards (e.g. UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO core labour conventions)<sup>1</sup>.  
Yes/No. If yes provide link.

Yes, our resort does. Below links for your reference:

- <https://www.gco.gov.qa/en/focus/labour-reform/>
- <https://qatarlaborlaw.com/>
- <https://www.almeezan.qa/Default.aspx>
- <https://www.minor.com/storage/download/corporate-policies/human-rights-policy-en.pdf>

5. Does your company have a human rights due diligence process for identifying and prioritising workforce risks in its operations and throughout its business relationships specifically in Qatar?  
Yes, our resort does. If yes, please explain this process and highlight the top three workforce risks you identified. All known and possible workforce risks are being taken with special attention to planning a course of action on how to solve and prevent the occurrence. The current workforce risk we have identified is the COVID-19 infection. Since the pandemic occurs at the beginning of the year 2020, our management immediately acted upon it by conducting a thorough inspection and strict implementation of the guidelines imposed by the Ministry of Public Health to prevent the possible spread of the virus if any.

### Business relationships and human rights:

<sup>1</sup> 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, management companies, labour suppliers, and service providers.

6. When selecting business partners, does your company consider how potential partners treat migrant worker rights? **Yes, our resort does. We do not have subcontractors, however, we have casual companies and contractor companies.**

If yes, please detail your vetting process for selecting subcontractors and hotel owners. **In selecting casual or contractor companies, several casual or contractor companies will be requested by the management through Purchasing Team of the Finance Department to share their quotations and proposal for our resort. Resort management will be selecting the best company with the best offer and conditions meeting our resort's expectations. An agreement between the selected casual or contractor company and our resort will be signed and share with respective departments.**

Is consideration given to recruitment fees, wages, general working and living conditions, and health and safety? **Yes, it is.**

Are these considerations weighted against cost? **Yes, they are.**

What percentage of business relationships are rejected due to risks? **Our resort only settled to sign an agreement with the right casual or contractor companies as per through selection.**

7. Does your company require hotel property owners and subcontractors in Qatar to comply with your human rights and other rights-related policies and procedures (eg. through contract clauses, brand standards)? **Yes, it does.**

If yes, please provide link to this policy or other evidence for both property owners and subcontractors. **The same human rights we are implementing of Qatar as per its Labor Law such as:**

- <https://www.gco.gov.qa/en/focus/labour-reform/>
- <https://qatarlaborlaw.com/>
- <https://www.almeezan.qa/Default.aspx>
- <https://www.minor.com/storage/download/corporate-policies/human-rights-policy-en.pdf>

How do you ensure they understand the requirements (e.g. through trainings and workshops) and what mechanisms do you employ to monitor compliance and hold them accountable? **We facilitate training with English and Arabic translation. All other Department Heads will relay to the casual and contractors in an informative language such as English and Hindi too.**

## Recruitment

8. Does your company have a publicly-available policy which requires that no worker in its operations or supply chains should pay for a job, and that the costs of recruitment (i.e., recruitment fees) should be borne by the employer ("Employer Pays Principle")? **Yes, our resort does. All recruitment costs such as visas, tickets, etc. will be borne by our resort. Here is the link: <https://qatarlaborlaw.com/qatar-labor-law/> Minor International's Human Rights policy also stipulated that "We will operate in full compliance with applicable wage, work hours, overtime and benefits laws"; and that "We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking."**

9. Please describe the due diligence process you undertake to ensure that your recruitment standards are applied. In your answer please address specifically:

- a) Whether you carry out due diligence on recruitment agents in sending countries? **We do not have a recruitment agency in a business partnership. We hire candidates directly by our resort process with the Human Resources team.**
- b) Whether you conduct interviews with workers prior to employment to establish if fees have been paid? Yes/No. If yes, please provide details including percentage of workers you interview. **There is no fee to be requested from the candidates. All candidates who are shortlisted are advised that there will be no kind of fee will be requested by our resort management before employment with us.**
- c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe. **Since our recruitment is directly through Human Resources Department of our resort, there is zero chance of contract substitution. Our resort management strictly follows the signed contract and the approved benefit grid per grade of the position.**

- d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process. **We do not have a recruitment agency in a business partnership. We are cooperating with companies with good reputation and well-known in the country, with all necessary registration documents. Ministry Of Administrative Development, Labour and Social Affairs (ADLSA) in cooperation with ILO has the controlling function, not other business entities. At the same time, we never got any complaints from casuals about any risks associated with recruitment.**
10. How many instances of recruitment fees paid by workers has your due diligence processes uncovered in 2019 and 2020, and how much (if any) was paid back to workers during this period. What percentage of your workforce were found to have paid fees? **None. Recruitment cost is covered by our company.**

### **Payment & wages**

11. What is your company's process for determining workers' wages in Qatar, and what benchmarks does it use to set wage levels (e.g. do you have a non-discrimination and/or living wage policy; if so please provide)? **Our resort management is reassuring that we are following the Qatar Labour Law (<https://www.gco.gov.qa/en/top-news/adlsa-statement-minimum-wage-noc/>) and International Labour Organization ([https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms\\_726174.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_726174.pdf)). The standard salary is based on the approved average CompSet or Salary comparison against other hotel industries in Doha, Qatar, and these are being reviewed regularly as needed.**

Please explain how these policies apply to subcontracted workers including how you monitor this and whether you collect data on wages paid by subcontractors. **We are not held liable for the salary offering by the casual or contractor companies. All companies in Qatar are required to strictly follow the rules and regulations and new implementations imposed in the Qatar Labor Law / Ministry Of Administrative Development, Labour and Social Affairs (MADLSA).**

12. How does your company ensure that workers are paid on time and in full, including for overtime and without illegal deductions? **Our resort management ensures that salary is being paid monthly before the current month ends. A Wage Protection System is being followed and all companies are being monitored on this ([https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms\\_726174.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_726174.pdf)).**

How does this apply to subcontracted workforces? What steps does the company take when your labour suppliers or subcontractors fail to pay workers on time and in full (please illustrate this with specific examples)? **We are not held liable for the monthly salary of our casual staff and contractors, however, we never received a complaint from any of our casual staff and contractors that they have not received salary on time. Qatar is very particular when it comes to the Wage Protection System therefore, all companies are following it strictly.**

### **Redundancy of workers due to COVID-19**

13. If your company, your subcontractors, or other business partners terminated contracts of workers in your hotels during the COVID-19 pandemic, please state how many workers in total were terminated during 2020 and what percentage of the workforce this represents. Please provide figures for your own operations and that of your subcontractors and business partners, including hotel owners. **Our resort had to terminate 114 team members out of 596 active team members in our operation at that moment. That is equivalent to 19.13 %.**
14. Please explain the process undertaken to decide which workers would be terminated and what, if any, non-financial assistance was provided to terminated workers (that was not part of their termination package e.g. plane tickets home) that went beyond that prescribed by the Qatari Government. **Termination cases happened during pandemic were based on the performance appraisal, restructuring of the organizational chart of each department and the newest team member who were on the lowest score of their recent performance appraisal.** What policies and processes (if any) did you implement to ensure that a fair process was conducted for workers employed by subcontractors, and how did you monitor this? **A thorough process from all angles**

of reviewing all the team members/workers per section or department based on the latest performance appraisal and reviewing the positions' essentiality on the resort's operation.

15. If, and when, workers were terminated, what financial packages/compensation were given to them? Our resort follows Qatar Labour Law for every exit process of leaver including the end of service/gratuity, last monthly salary if any, and repatriation ticket (if needed as per entitlement).

What packages/compensation were provided to subcontracted workforces and how did you monitor this? Our company is not held liable for any terminations with our casual or contractor companies. All companies in Qatar is following strictly the Qatar Labour Law and regulations. Any violations are reported immediately to the Ministry Of Administrative Development, Labour and Social Affairs (MADLSA).

#### **Document retention, job mobility & freedom of movement**

16. How does your company ensure that workers have free and secure access to their passports and identity documents? Our resort is not keeping the passport or identity cards of our workers or team members.  
How does this apply to subcontracted workforces? What steps does the company take when you discover that workers subcontracted at your hotels do not have sole, secure access to these personal items? We have not received any complaints so far that the casual staff or contractor is not having their identity documents or passports with them.
17. How does your company ensure that workers are free to change jobs at will and without penalty? All team members/workers are having their free will to change employer provided that they follow the newly implemented rules of Qatar through the Ministry Of Administrative Development, Labour and Social Affairs. How does this apply to subcontracted workforces? The same applies to all individuals in Qatar including casual or contractor companies.

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract? Based on the restrictions provided as per Qatar Labour Law and Ministry Of Administrative Development, Labour and Social Affairs.
  - How many workers have made requests to change employer using the new Ministry of Labour sponsorship transfer process and how many of these transfer requests were granted? There are approximately 80 requests and 63 are approved while there are almost 17 on the process or under review.
  - Do workers have to comply with any additional administrative requirements applied by the employer to change jobs? They need to continue complying with the imposed guidelines on how to protect themselves and others from current viral infections while staying in our accommodation and while under our sponsorship.
18. Do you have a policy that specifies workers should not be subject to restrictions on movement, including curfews in provided accommodation? No, as we have a 24-hour hotel business operation which requires continuous movement of team members from and to the workplace. If yes, please provide the policy or other evidence. If there are curfews, are there any differences in treatment of men and women? Yes/No. Does your policy apply to subcontracted workers?

#### **Health & safety**

19. Do you have specific policies and protocols to manage outdoor work (e.g. security, gardening, cleaning) and prevent the risk of heat stress beyond implementation of the national summer working hours ban? Yes, our resort is issuing sunscreen, sunglasses, water or replenishing drinks in a different location on the island, towels during the summer season. We strictly advise all of our team members or workers on the island about managing heat stress or heats stroke especially during the summer season  
(<https://emergencytrauma.wordpress.com/2014/06/18/updated-supreme-council-of-health-qatar-heat-stress-awareness-guide/>, <https://www.marhaba.qa/summer-working-hours-comes-into-effect/>, and <https://m.gulf-times.com/story/549306/Advisory-on-how-to-beat-heat-stress-at-work>)  
If yes, please provide the policy or other evidence. Does this apply to subcontracted workers? Yes. If yes, please provide policy or other evidence. Yes, it is the same publications or posters applied to all other casual staff and contractors assigned in our resort.



20. Do you have policies and procedures in place to protect workers from becoming infected with the COVID-19 virus? **Yes.** If yes, please policy or other evidence. **All the imposed guidelines by the Ministry of Public Health to protect all individuals in Qatar are strictly followed by our resort team through preparing memorandums, providing video presentations, posters, online training, and daily reminders of the ways to protect ourselves during this pandemic. Here is the link to the publicly available implementations and reminders: <https://covid19.moph.gov.qa/EN/How-to-protect-yourself/Pages/default.aspx>.** Does this apply to subcontracted workforces? **Yes.** If yes, please provide the policy or other evidence. **All the imposed guidelines by the Ministry of Public Health to protect all individuals in Qatar are strictly followed by our resort team through preparing memorandums, providing video presentations, posters, online training, and daily reminders of the ways to protect ourselves during this pandemic including the casual companies and contractor companies as we avoid discrimination in the property. Here is the link to the publicly available implementations and reminders for all individuals in Qatar: <https://covid19.moph.gov.qa/EN/How-to-protect-yourself/Pages/default.aspx>.**

### **Living conditions**

21. Please provide your company's standards for workers' living conditions (Please provide policy or other evidence). **Our resort is providing duty meals, housing, and transportation to all our team members and workers. Qatar has implemented an E-contract system for all individuals in Qatar to reassure that all the individuals living conditions are monitored and checked against the violations. What steps does the company take to monitor the performance of subcontractors and labour suppliers to house workers against company and government standards? Qatar is monitoring it through an e-contract system. What remedial action is taken if these standards are breached? Once the Qatar government caught a company violating the provision of safe housing, transportation, and food for their workers, they will be subject to further investigation and penalty.**
22. Please describe any changes you made to workers' living conditions in response to the COVID-19 pandemic. **Our resort management reassured us that we are keeping our team members/workers safe and healthy. And during this pandemic time, we have reinforced the no visitors' policy in accommodations and prompt accommodation disinfection if needed, posting of reminders and guidelines inside their accommodations on how to protect themselves during this time, presenting videos and online training on how to keep themselves safe from possible viral infection. Do these apply to subcontracted workers? We incorporate this information during the briefings of each department. Please detail how you monitored compliance with any new COVID-19 specific requirements specified by your policies or by the Qatari Government. We have a Qatar Clean Manager assigned in our resort who makes sure that we are in close contact with the government sector for further advice and proper monitoring of compliance.**

### **Prevention of discrimination, physical and sexual abuse, exploitation and harassment**

23. Does your company have the following policies:
- On the prevention of bullying, discrimination and physical abuse of workers, by fellow workers and/or hotel clients in its operations and business relationships? **Yes/No.** If yes, please provide the policy or other evidence. **Yes, our resort management reassures that our workplace will be free from any bullying, discrimination, and physical abuse. We facilitate online training sessions such as "Appropriate Workplace Behavior", "The MINOR Code of Conduct", "The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism". Upon joining of the new joiner and yearly, we facilitate the sessions and daily reminder through briefings of each department.**
  - On the prevention of sexual abuse, exploitation, and harassment by fellow workers and/or hotel clients in its operations and business relationships. If yes, please provide the policy or other evidence. **Yes, our resort management reassures that our workplace will be free from any sexual abuse, exploitation, and harassment by fellow workers and/or hotel clients in its operations and business relationships. We facilitate online training sessions such as "Appropriate Workplace Behavior", "The MINOR Code of Conduct", "The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism". Upon joining of the new joiner and yearly, we facilitate the sessions and daily reminder through briefings of each department.**

24. Please provide the following information on the systems in place for reporting, investigating and redressing cases of abuse:
- How are workers made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)? [Our resort management implemented an open door policy where every team member has the right to report and express their sentiments and grievances personally or by writing.](#)
  - How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)? [Once directly hired team members of our resort are introduced and oriented with the policies, department heads are advised to share the same with their casual staff or contractors.](#)
  - Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse? [Yes, they all can.](#)
  - What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses? [Full respect and Confidentiality reassurance especially if the worker will personally report.](#)
  - What support you provide workers who make a claim of sexual abuse, including by hotel clients? including to file a criminal complaint, seek medical care, and pursue redress against a perpetrator, such as a hotel client? Does any provision of support also apply to subcontracted workers? [We have not encountered such case as implement strictly the proper workplace behavior to all our team members/employees/workers. However, should there be any in the future, all the emotional support and spiritual support, we can offer will be provided.](#)
25. How many grievances were raised by workers in 2019 and 2020 in relation to:
- Bullying, discrimination, physical abuse in its own operations? [None so far.](#)
  - Bullying, discrimination, physical abuse in its subcontracted workforce? [None so far.](#)
  - Sexual abuse, exploitation, and harassment in its own operations? [None so far.](#)
  - Sexual abuse, exploitation, and harassment in its subcontracted workforce? [None so far.](#)

## Representation & remedy

26. How many of your hotels in Qatar have worker committees or an equivalent mechanism for worker organising? [Our resort has a Welfare Committee.](#) How are worker representatives selected? [Department Heads nominations from each department.](#) Do the committees cover subcontracted workers? [There is no assigned Committee member from any casual or contractor companies, however, all implemented welfare-related matters, all workers, directly hired, casual or contractors are included such as for safety, security, and welfare-related concerns.](#)
27. 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? [Yes, it does. Our company is having an open-door policy where team members can raise freely their concerns anytime to their department head, human resources team, and top management. We also have the suggestion box and Hear your say suggestion mailbox. Minor International also has implemented a grievance mechanism "whistleblower policy" \(<https://www.minor.com/storage/download/corporate-policies/20210303-whistle-blower-policy-en.pdf>\) , which the reporting person can access by emailing to \[whistleblower@minor.com\]\(mailto:whistleblower@minor.com\)](#)

How are workers made aware of this mechanism? [The suggestion box place in the hallway accessible for all team members to drop their concerns and Hear your say suggestion mailbox where any team member can send their concerns through e-mail. Both can be done or sent anonymously to keep their identity private and confidential.](#)

How are subcontracted workers made aware of this mechanism? [New casual staff or contractors are oriented of the island and its sections including this mechanism through department heads they will be assigned to report to.](#)

28. How many grievances were raised by workers in 2019 and 2020 in relation to:
- Recruitment costs? [None so far.](#)
  - Wages? [None so far.](#)

- General working or living conditions? [None so far.](#)
- Health and safety? [None so far.](#)
- How many of these grievances were raised by subcontracted workers? [None so far.](#)

**Other information**

29. 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? [Our resort is committed to growing the hotel business and concurrently improving the economic, social, and environment of the group of people where we operate. To reinforce our social commitment through our core values and good business governance, we pledge to embed human rights based on International Labor Organization and Qatar Labour Law in our daily operations.](#)