

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	Al Messila, A Luxury Collection Resort and Spa, Doha	Managed	Katara Hospitality
2	Doha Marriott Hotel	Managed	Katara Hospitality
3	JW Marriott Marquis City Center Doha	Managed	Al Rayyan Tourism Investment Company WLL
4	Marriott Marquis City Center Doha Hotel	Managed	Al Rayyan Tourism Investment Company WLL
5	Sharq Village and Spa	Managed	Katara Hospitality
6	Sheraton Grand Doha Resort and Convention Hotel	Managed	Katara Hospitality
7	The St. Regis Doha	Managed	Al Fardan Hotel & Resorts
8	The Ritz-Carlton, Doha	Managed	Katara Hospitality
9	W Doha	Managed	Nozul Hotels & Resorts WLL
10	The Westin Doha Hotel & Spa	Managed	Ghanem Al Thani Holdings WLL
	Four Points*	Franchised	Gulf Trading and Contracting WLL

*As a franchisee, this property is not reflected in the below information unless otherwise noted.

In franchised hotels, Marriott does not manage or employ associates, building operations, or maintenance. Our role in these hotels is to collaborate with owners and franchisees to ensure that our brand standards are met and that franchised hotels benefit from certain of our business systems and platforms. We extend this collaboration to areas of sustainability, social responsibility, and human rights. We work with owners to implement capital expenditures for improving building efficiency and with franchisees to encourage sustainable and responsible operational practices.

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	0	N/A	N/A	
Employed by property owner	3,604*	2,719	884	Indonesia, India, Kenya, Morocco, Nepal, Philippines, and Sri Lanka

Employed by subcontractors (e.g. service providers or labour suppliers)	603	Information unavailable		
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)	0	N/A	N/A	

*Pursuant to our hotel management agreements, Marriott is responsible for the management of the individuals employed by the property owner. Marriott selects and manages the employees, and they are considered and referred to as Marriott associates.

3. Please complete the table below with labour supply data.

In Qatar, Marriott properties have an average of 603 subcontractors per day from 64 agencies. All commercial contracts are confidential, and Marriott is unable to disclose the names of any contracting parties without their permission to do so. We have provided aggregated information for the nature of the subcontracted work and the average number of subcontractors performing that type of work per day.

No.	Labour Supply Company	Nature of work eg. Cleaning, housekeeping, security	Total number of people
1		Housekeeping and Cleaning	131
2		Security	11
3		Valet Parking and Services	30
4		Chef, Server, and Kitchen Staff	195
5		Engineering	9
6		Other (e.g., lifeguards, landscaping, other labor)	227

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)¹. Yes/No. If yes provide link.

Marriott has a publicly available [Human Rights Policy Statement](#), which references the United Nations Universal Declaration of Human Rights and reflects the company's commitment to conduct its business in a manner consistent with these principles. The Human Rights Policy Statement also highlights Marriott's aim to provide a safe and healthy working environment for all associates and to respect human rights, including all business operations.

In addition to our Human Rights Policy Statement, Marriott has several other publicly available policy commitments that address human rights, including the [United Kingdom Modern Slavery Act Statement](#), [Principles of Responsible Business](#), [Business Conduct Guide](#), and the [Global Procurement Supplier Conduct Guidelines](#).

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

Marriott has also established publicly available [Sustainability and Social Impact Goals](#) to guide our future path to making a positive and sustainable impact, support meaningful progress towards the United Nations Sustainable Development Goals, and further our commitment to human rights. By 2025, 100% of on-property associates will have completed human rights training, including on human trafficking, responsible sourcing, and recruitment policies and practices. Likewise, Marriott has set a goal to enhance human rights criteria in recruitment and sourcing policies and work with our industry to address human rights risks in the construction phase by 2025.

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/No. If yes, please explain this process and highlight the top three workforce risks you identified.

Marriott implements an ongoing risk management process to identify, prevent, and mitigate relevant human rights risks globally, including in Qatar. We also work collaboratively with peers and industry associations, including the Sustainable Hospitality Alliance and World Travel and Tourism Council, to assess and identify relevant human rights issues that affect our industry and address those issues. We have identified forced labor, human trafficking, and unethical recruitment as some of the priority workforce risks affecting our business operations and supply chain.

As a member of the Sustainable Hospitality Alliance, previously known as the International Tourism Partnership, we are also committed to implementing the [Principles on Forced Labor for the Hospitality Industry](#), which we helped develop and launch in June 2018. The Principles on Forced Labor have helped prioritize action to address the primary drivers of forced labour within the hotel industry and include:

- Every worker should have freedom of movement. The ability of workers to move freely should not be restricted by their employer through abuse, threats, and practices, such as unlawful retention of passport and valuable possessions.
- No worker should pay for a job. Fees and costs associated with recruitment and obtaining employment should not be paid by workers.
- No worker should be indebted or coerced to work. Workers should work voluntarily, be informed of their employment terms and conditions in advance without misrepresentation and paid regularly as agreed and in accordance with any applicable laws and regulations

Business relationships and human rights:

6. When selecting business partners, does your company consider how potential partners treat migrant worker rights? Yes/No. If yes, please detail your vetting process for selecting subcontractors and hotel owners. Is consideration given to recruitment fees, wages, general working and living conditions, and health and safety? Are these considerations weighted against cost? What percentage of business relationships are rejected due to risks?

As stated in our [Human Rights Policy Statement](#) which applies to our business globally, Marriott strives to provide a safe and healthy working environment for all managed employees. We have specific workplace policies pertaining to recruitment, working conditions, living conditions, and health and safety. Marriott expects business partners to comply with this policy as well as all local and relevant laws, including those on human rights. We work to hold our business partners around the world to similar ethical business standards and human rights standards as defined within Marriott's [Global Procurement Supplier Conduct Guidelines](#) and other relevant corporate policies.

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/No. If yes, please provide link to this policy or other evidence for both property owners and subcontractors. 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?

Marriott's commitment to responsible business practices and operations extends to our engagement with third-party owners, labour providers, vendors, and suppliers. Marriott requires all

managed property owners to comply with all human rights policies and procedures. Marriott also expects subcontractors to comply with the company's [Human Rights Policy Statement](#) and the human rights standards outlined in the [Global Procurement Supplier Conduct Guidelines](#). The Guidelines are intended to promote the highest standards for human rights throughout our supply chain, and we encourage business partners to follow similar principles and hold their own suppliers and subcontractors to the same standards and practices. These expectations are enforced through compliance with local laws and the contract; if the party is not complying with laws or the contract, Marriott reserves the right to terminate the relationship.

The Global Procurement Supplier Conduct Guidelines are publicly available and attached to all newly negotiated contracts supporting hotel operations that are administered by Marriott's central procurement group. In addition, more than 5,000 associates worldwide have completed Marriott's procurement training, which includes content around human rights, and Marriott proactively collaborates with suppliers as part of our overall sustainability and human rights strategy. Contracts negotiated through the central procurement group are reviewed on average every three years, and expectations, including those around human rights, are reinforced during the review process.

In 2016, Marriott launched a human trafficking awareness training, which is mandatory for all on-property associates at managed and franchised hotels and available to owners and subcontractors. The training discusses both sex and labor trafficking and teaches associates how to identify and respond to potential indicators of human trafficking. To date, nearly 825,000 associates have completed the training. In 2020, Marriott donated the training to ECPAT for broader industry use; it is available on ECPAT's online learning platform in 17 languages, and nearly 400,000 employees at other hotels have accessed the training through this open-source platform. Currently, Marriott is developing an updated scenario-based version of the training, which includes a scenario on potential labor exploitation by a subcontractor.

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/No. If yes, please provide link to the policy.

As stated in Marriott's [Human Rights Policy Statement](#), the company implements a "no fees" recruitment policy; we do not ask for money or charge fees to the applicant as part of the application process. Similarly, our [Global Procurement Supplier Conduct Guidelines](#) state that Marriott expects suppliers to not charge recruitment fees as part of the application process or use fraudulent recruitment practices. In the event that there are fees associated with recruitment and employment in Qatar, such as relocation costs, visas, and government-required medical checks, Marriott pays all related fees and does not charge any fees to the associates.

Marriott recognizes that recruitment scams are now a global concern that span across all industries, and we have been made aware of a series of fraudulent offers for Marriott employment. Scammers falsely claim to be representatives of Marriott recruiting potential employees on the company's behalf, then offer assistance in securing work permits and visas in exchange for money. In an effort to raise awareness of and prevent these types of recruitment scams, we have developed [Technical Guidance on Protecting Yourself from Recruitment Scams](#), posted a statement on our News Center website, and provided additional cautions and guidance on the Marriott Careers website.

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? Yes/No. If yes, provide details.
 - 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.
 - c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.

- d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.

Marriott uses a variety of channels to recruit potential employees in Qatar and uphold the highest standards regarding ethical recruitment, employment, and human rights. Marriott has conducted recruitment trips to source countries where we have identified, interviewed, and hired associates for various roles. We have also hired associates locally in Qatar. In addition, Marriott works with vetted recruitment agencies to identify additional associates.

Marriott requires third-party contractors, including recruitment agencies, to comply with all local laws prior to entering into a contract with Marriott. Legal documentation related to the validity of operating licenses are reviewed as part of the bidding process and annually throughout the duration of the contract. Companies that provide contract labor are required to provide copies of residency and work permit documentation for all subcontractors and food handlers' certificates for any contractors in food-handling positions. As stated in our [Global Procurement Supplier Conduct Guidelines](#), which are attached to newly negotiated contracts as described above, we expect suppliers to not charge recruitment fees as part of the application process or use fraudulent recruitment practices.

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?

We have not found any instances of recruitment fees paid by workers in Qatar.

As mentioned above, we have been made aware of some fraudulent offers for Marriott employment made by criminals where recruitment and other fees were requested; however, these fraudulent offers were not made by Marriott or the subcontractors within our supply chain, and we have worked to raise awareness of and prevent these types of recruitment scams.

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)? Please explain how these policies apply to subcontracted workers including how you monitor this and whether you collect data on wages paid by subcontractors.

In Qatar, Marriott hires only full-time salaried employees; this policy remained, even amid the COVID-19 pandemic. All employees are paid a fixed monthly salary with additions for tips, incentives, and other fixed benefits. Salaries are established based on minimum salaries set by local labor authorities and salary scales for each position. Marriott also conducts external surveys to benchmark wages set for the hospitality sector. This benchmarking informs wage levels based on brand type; we aim to pay at the 50th percentile for distinct/select brands and at the 75th percentile for luxury brands.

Marriott's [Human Rights Policy Statement](#) and other policy commitments include a non-discrimination policy; we support and uphold the elimination of discriminatory practices with respect to all aspects of employment, including payment and wages, and promote and embrace diversity and inclusion within business operations.

12. How does your company ensure that workers are paid on time and in full, including for overtime and without illegal deductions? 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)?

Marriott follows all applicable laws related to acceptable conditions of work. Overtime is paid, as per the labor law, and no deductions are made to associates' salaries without their consent. Any salary deductions are authorized by the associate and approved by the Finance and Human Resources Departments. Examples of authorized and approved deductions include salary advances, payment for tickets over and above employee's entitlement, and insurance for family members not covered under the employee's contractual terms.

When allegations of labor law violations are brought to our attention, Marriott investigates the situation and takes corrective action if necessary. For example, in 2018, the Business and Human Rights Resource Center shared a statement from the General Trade Union of Construction Workers in Jordan that alleged migrant workers subcontracted for the St. Regis hotel in Amman had experienced frequent delays in salary payment. While Marriott did not have a direct relationship with the contractors or subcontractors working at the hotel site, Marriott contacted the owning company of the hotel and launched a joint investigation as explained in our [response](#).

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.

The travel industry and Marriott have been impacted in unprecedented ways by the COVID-19 pandemic. As demand at our hotels dropped significantly, we have worked tirelessly to take care of our associates, guests, owners, and other key stakeholders. At the property level, reducing staff was one of the many proactive steps Marriott took to mitigate the negative financial and operational impacts of COVID-19.

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. 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?

All termination decisions were made jointly by the Finance and Human Resources Departments and reviewed by the Area Director of Human Resources. All termination packages were consistent with government requirements. For associates who were unable to return to their home countries, Marriott continued to provide housing and essential support.

Marriott has recently established an Alumni Community, which remains active in Europe and the Middle East. Upon voluntary departure or termination, all associates are invited to register for the Alumni Community to ensure we continue to support those who have been a part of the Marriott International family. Through the Alumni Community, former associates receive news about the business, information about tools and resources available to them, and future job opportunities. Marriott aims to rehire associates who were terminated due to the COVID-19 pandemic where possible.

15. If, and when, workers were terminated, what financial packages/compensation were given to them? What packages/compensation were provided to subcontracted workforces and how did you monitor this? In line with government requirements

All termination packages were consistent with government requirements.

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? 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?

Passports and other identity documents are not kept with the employer and are promptly returned to the employee as soon as the required work authorizations are obtained. In some cases, an associate may request the employer keep his/her passport or other identity documents for safe keeping, but the request must be submitted in writing.

17. How does your company ensure that workers are free to change jobs at will and without penalty? How does this apply to subcontracted workforces?

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract?
- 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?
- Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?

Marriott encourages associates to discover opportunities, build new skills, and grow their careers at Marriott. We recognize that pursuing these career paths may require job changes, so we fully support associates who change jobs and ensure they do not incur penalties for doing so.

Marriott supports and follows all applicable laws pertaining to residency and work visa requirements. We support the Qatari government's amendment of the law to no longer require exit visas for migrant workers. Marriott issues transfer permits (NOC – No Objection Contract), wherever ownership has granted us the authority to do so, to help associates change jobs. In some cases, the operator must obtain ownership approval to provide NOCs.

18. Do you have a policy that specifies workers should not be subject to restrictions on movement, including curfews in provided accommodation? Yes/No. 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?

Marriott supports and follows all applicable local laws and policies. Marriott's [Human Rights Policy Statement](#) includes a non-discrimination policy that ensures there are no differences in the treatment of men and women; we support and uphold the elimination of discriminatory practices with respect to all aspects of employment, and promote and embrace diversity and inclusion within business operations.

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/No. If yes, please provide the policy or other evidence. Does this apply to subcontracted workers? Yes/No. If yes, please provide policy or other evidence.

Marriott follows all legal requirements, local laws, and standards governing acceptable conditions of work. We recognize that associates can be at serious risk of illness and over-exhaustion during times of intense heat. Marriott does not allow strenuous tasks and those requiring use of heavy or non-breathable clothing or chemical protective clothing to be conducted when temperatures are above 115 degrees. Managers and supervisors are trained to ensure all safety precautions are followed and necessary heat prevention programs are in place in and around the hotel and applicable to all associates, including subcontracted workers. New associates are closely monitored for the first 14 days, until they are fully acclimatized to the heat. Managers are encouraged to proactively monitor for warning signs of heat-related illness to discuss heat safety precautions with associates to prevent heat-related illness.

Marriott places an emphasis on health and safety for guests and associates and has robust health and safety policies and procedures in place. New associates are provided with an in-depth Occupational Health and Safety Training. Health and Safety Committees conduct monthly meetings to ensure adherence to all relevant policies and take corrective action as necessary. If a health or safety-related incident occurs, it is recorded and investigated to determine its root cause and prevent a future reoccurrence. Marriott conducts annual Occupational Health and Safety training and simulations and provides a variety of specialized trainings, such as Manual Handling, Blood Borne Pathogen, and Ergonomics.

20. Do you have policies and procedures in place to protect workers from becoming infected with the COVID-19 virus? Yes/No. If yes, please provide policy or other evidence. Does this apply to subcontracted workforces? Yes/ No. If yes, please provide the policy or other evidence.

Since our founding over 90 years ago, health and safety have been at the heart of Marriott's approach to hospitality, and this commitment to our associates and guests continues to anchor us and to inform our decisions as we adapt to new challenges presented by COVID-19. To minimize risk and enhance safety for our associates, Marriott has developed guidance applicable to all hotels in the Europe and Middle East region and enhanced cleaning and sanitation protocols to enable a consistent approach to addressing COVID-19 and protecting associates from becoming infected. This guidance is monitored by the [Marriott Cleanliness Council](#), a group of in-house and outside experts in food and water safety, hygiene and infection prevention, and hotel operations, who actively monitor and evolve solutions to ensure a continued focus on health and safety. While individual hotel practices may vary based on local laws, the [framework](#) illustrates how seriously we must protect the health of our associates, guests, and customers.

Living conditions

21. Please provide your company's standards for workers' living conditions (Please provide policy or other evidence). What steps does the company take to monitor the performance of subcontractors and labour suppliers to house workers against company and government standards? What remedial action is taken if these standards are breached?

Marriott follows all legal requirements, local laws, and standards governing acceptable conditions of work. Human Resources has direct responsibility for accommodations provided to employees and aims to offer housing accommodations that provide a safe, clean, respectful, and restful environment for all associates. Buildings are rented and lease agreements signed following inspections of the buildings, including required meeting of all local fire safety codes of the country. Monthly inspections are carried out together with preventive maintenance contracts for plumbing, electrical, and mechanical equipment. The company provides accommodation only for those employees that the hotel employs directly. For associates hired and managed by a third-party, the third-party agency provides accommodation for their respective staff. Marriott expects third-party agencies to comply with the human rights standards outlined in the [Global Procurement Supplier Conduct Guidelines](#).

22. Please describe any changes you made to workers' living conditions in response to the COVID-19 pandemic. Do these apply to subcontracted workers? Please detail how you monitored compliance with any new COVID-19 specific requirements specified by your policies or by the Qatari Government.

Marriott is following local and international health guidance and taking all necessary precautions to provide a safe living environment for associates amid the COVID-19 pandemic. Marriott developed additional employee cafeteria and transportation guidelines and made substantive changes to its Associate Housing Guidance in response to the COVID-19 pandemic. All cleanliness protocols and procedures and personal protective equipment standards (PPE) maintained on property were implemented in associate housing; approved cleaning materials and supplies, social distancing products, and PPE were provided by Marriott. All updated local laws and regulations for room sharing were followed, and individual rooms were provided as occupancy allowed. Marriott also developed associate housing cleanliness materials and training, displayed posters throughout the associate housing, and conducted regular associate housing inspections to ensure compliance with new standards.

Marriott requested that third-party agencies that provide housing accommodations to their respective staff make the same changes to workers' living conditions. In instances where the third-party agencies were unable to comply or the changes were not achievable within the current living conditions, associates were relocated to accommodations provided by Marriott. Likewise, subcontractors who were not previously housed by third-party agencies were also offered accommodations provided by Marriott to minimize their potential exposure.

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.
- 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.

Marriott does not tolerate harassment of any kind from any associate, manager, supervisor, vendor, guest, client, or customer. We are proud to maintain a long-standing Harassment Prevention Policy that strictly prohibits all forms of harassment, including sexual harassment, discrimination, and retaliation, and creates an environment where associates feel respected and freely able to report any harassing conduct. The Global Anti-Harassment and Professional Conduct Policy is not publicly available, but it is described in Marriott's [Harassment Prevention document](#). The company's commitment to harassment prevention and nonretaliation for raising harassment complaints is also reinforced in Marriott's [Business Conduct Guide](#) and [Human Rights Policy Statement](#).

Marriott's Global Anti-Harassment and Professional Conduct Policy is accessible to associates through Marriott Global Source (MGS), Marriott's intranet, Marriott's associate handbook, and by request through the Human Resources Department. At new hire orientation, associates are asked to read and acknowledge both the associate handbook and Anti-Harassment Policy. In addition, Marriott's Harassment Prevention Training program is mandatory for all associates globally. Marriott periodically reinforces these policies, its commitment to harassment prevention, and the importance of and avenues for reporting harassment, through leadership messages.

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)?
- How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
- Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?
- What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?
- 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?

Marriott provides associates with a variety of means, including anonymous channels, to report unethical, abusive, and harassing behavior. Marriott's "open-door" process encourages associates to discuss concerns with their manager, but other reporting options include any manager, Human Resources representative, or corporate Associate Relations representative. If the abuse involves a manager or supervisor to whom the associate directly or indirectly reports, alternative reporting options are available. Associates may also report confidentially and anonymously through Marriott's 24-hour toll-free Business Integrity Line (BIL), accessible by phone, by email, or online; the BIL phone number and web address are included in the associate handbook. These reporting channels are openly displayed in all associate areas and therefore available to subcontracted workers.

Associates are made aware of these reporting processes through new hire orientation and mandatory training. Newly hired associates must take harassment prevention training within 90 days of hire, and non-management associates who move into a management role complete the management training within 90 days of transfer. In addition, Marriott developed a "Respect for All"

video training series, launched in 2019, that is intended to help associates recognize harassment and leverage available resources to raise complaints about harassing behaviors.

Marriott strictly prohibits retaliation against associates who report perceived harassment or who file, testify, assist, or participate in any manner in any investigation, proceeding or hearing regarding potential harassment. An associate who brings a harassment complaint to the attention of the company will not be adversely affected as a result of reporting the harassment. This non-retaliation policy is included in Marriott's Global Anti-Harassment and Professional Conduct Policy and is accessible to associates through the channels outlined above. It is also reinforced in Marriott's [Business Conduct Guide](#) and [Human Rights Policy Statement](#).

25. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Bullying, discrimination, physical abuse in its own operations?
- Bullying, discrimination, physical abuse in its subcontracted workforce?
- Sexual abuse, exploitation, and harassment in its own operations?
- Sexual abuse, exploitation, and harassment in its subcontracted workforce?

Complaints and investigations are, to the extent possible, strictly confidential; information concerning harassment complaints and investigations is shared internally or externally only with persons who have a legitimate need to know. Therefore, Marriott will not disclose information about specific grievances raised.

Marriott policy requires a prompt and thorough investigation of all harassment complaints. In all cases, management must communicate with the reporting associate when the investigation is complete, confirm that appropriate action was taken, and encourage the associate to report any further complaints of harassment or retaliation. A violation of Marriott's Anti-Harassment Policy is grounds for disciplinary action up to and including termination, and hotels may remove and/or ban a guest for conduct that is offensive or abusive to or poses risk to the safety of associates, including harassment and sexual harassment. Company policy also provides that management should follow-up periodically with the individual who reported the behaviour to confirm that the offending conduct has stopped. Managers who fail to promptly address complaints of harassment from their associates are also subject to discipline.

Representation & remedy

26. How many of your hotels in Qatar have worker committees or an equivalent mechanism for worker organising? How are worker representatives selected? Do the committees cover subcontracted workers?

As stated in Marriott's [Human Rights Policy Statement](#), the company strives to provide a safe and healthy working environment for all its associates, including a commitment to freedom of association; we support the freedom of association and the right to choose a collective bargaining representative, if desired. Similarly, our [Global Procurement Supplier Conduct Guidelines](#) state that Marriott encourages suppliers to respect an employee's freedom of association and right to bargain collectively, if desired.

In Qatar, hotels maintain Associate Relations Committees where departmental representatives regularly discuss challenges, concerns, feedback, associate engagement, and opportunities to improve service to guests and customers. Departmental representatives are chosen by their respective departments and equally represent directly employed and subcontracted associates. While the representatives tend to be directly employed associates, subcontracted workers may serve as departmental representatives on the Associate Relations Committees. They can also share any views or raise any issues specific to subcontracted workers with their respective departmental representatives.

Marriott also provides direct channels for associates to share their perspectives, including directly with the Human Resources Department, using their preferred communication channel (e.g., email, phone call, written document).

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? How are workers made aware of this mechanism? How are subcontracted workers made aware of this mechanism?

Marriott provides associates with a variety of means, including anonymous channels, to report unethical, abusive, and harassing behavior. Marriott's "open-door" process encourages associates to discuss concerns with their manager, but other reporting options include any manager, Human Resources representative, or corporate Associate Relations representative. If the unethical behavior involves a manager or supervisor to whom the associate directly or indirectly reports, alternative reporting options are available. Associates may also report confidentially and anonymously through Marriott's 24-hour toll-free Business Integrity Line (BIL), accessible by phone, by email, or online; the BIL phone number and web address are included in the associate handbook. These reporting channels are openly displayed in all associate areas and therefore available to subcontracted workers.

In addition, our Internal Audit Department conducts an annual Legal and Ethical Conduct Survey across a broad section of associates, including all officers and senior managers, to determine compliance with the company's Ethical Conduct policy.

Marriott strictly prohibits retaliation against associates who report a concern in good faith. Associates will not be subjected to an adverse employment action, including separation, demotion, suspension, or loss of benefits because of the complaint. This non-retaliation policy is included in Marriott's [Business Conduct Guide](#) and [Human Rights Policy Statement](#) and is accessible to associates through the channels outlined above.

28. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Recruitment costs?
- Wages?
- General working or living conditions?
- Health and safety?
- How many of these grievances were raised by subcontracted workers?

Marriott respects the confidentiality of associates who report misconduct and potential violations of the [Business Conduct Guide](#). We assure associates a reasonable degree of confidentiality during the investigation and resolution of the concern, and information concerning reports and investigations of misconduct is shared internally or externally only with persons who have a legitimate need to know. Therefore, Marriott will not disclose information about specific grievances raised.

Violations of the Business Conduct Guide are addressed promptly, consistently, and effectively. Punishment may include prosecution, involuntary separation from employment, or other appropriate disciplinary or performance management measures. A final update may be provided, if appropriate, to the person who report the violation, if the report was not made anonymously.

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?

The structure of Marriott enables the company to take an effective approach to managing its operations in the Gulf region, offering local and regional presence and expertise. A dedicated area team, including an Area Vice President, oversees the region (i.e., Gulf region, Levant area, and Turkey) and has established leaders and offices in key markets, including Qatar, to focus on human resources and operations within the sub-regions.