

Hotel companies in the Gulf: 20 questions on human rights

Introduction to the survey

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

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

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

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

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

Human rights

1. Does your company have a publicly available commitment to respect human rights? If so, please provide the link.

http://www.fourseasons.com/about_four_seasons/commitment-to-an-ethical-culture/

2. Does your company identify its salient human rights issues and does it have a due diligence process to manage them? (Key steps include: assessing actual and potential human rights risks, integrating and acting upon findings, tracking responses, and communicating how impacts are addressed).

If so:

- are these assessments conducted at headquarter, regional, country and/or operational level?
- please list the issues identified and share a link to any accompanying public reporting by your company.

Communicating human rights along the supply chain

3. How does the company use its leverage to influence business partners with regards to human rights policy and practices? (E.g. business partners: franchisees, building and hotel owners, hotel management companies etc.)
 - what challenges does your company face in doing so?

4. Does the company require third-party contractors to comply with the company's policies and standards? (E.g. third party-contractors: recruitment firms, labour suppliers and service providers).

If so: *Recruitment Agencies through which we hire/facilitate the deployment our full time employees are properly briefed about Four Seasons expectations and the conditions are stipulated in our agreement with them. For example Agencies are not allowed to charge any fees to the candidates.*

- how are these policies communicated to third-party contractors and how is their compliance monitored and enforced? *Recruitment conditions are stated in the agreement and we follow up with candidates who arrive in Doha.*
 - what challenges does your company face in ensuring third-party compliance?
5. What steps has the company taken to mitigate the human rights risks associated with the construction phase of hotel buildings?
- what challenges does your company face in doing so? *N/A*
6. How does the company ensure that workers (including agency staff) are made aware of their labour rights and company labour policies in a language they understand? *All our full time employees need to go through EMBARK which is our new hire orientation where our policies and procedures are explained.*

Business operations

7. Describe the scope and structure of your company's operations in Qatar.
Please include information on:
- the number of hotels and rooms
 - the names of the hotels
 - the type and explanation of the business models they operate under (owned and operated; leased; managed properties; franchised properties; joint ventures; other).
 - the level of the company's responsibility for human rights under these various arrangements.

(Example table)

| No. | Name of hotel | No. of rooms | Business model | Explanation of business model including level of responsibility for HR practice |
|-----|-------------------------|--------------|----------------|---|
| 1 | Four Seasons Hotel Doha | 232 | Managed | HR Policies, FS Policies, Local Labour Law. |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

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

Recruitment

8. What categories of workers are directly employed by the company?
All our Management and Non-Management colleagues are full time employees.
9. Please describe the company's recruitment process for workers that it hires directly.

Our vacancies are posted both internally and externally as required in our Career page through our company websites. Sometimes we use external job boards also such as Linked-in & Catererglobal.com. All our candidates go through 4 levels of interviews and approval process after which offer letters are presented to the successful candidate.

- do you use recruitment firms to supply these workers?

Most of the times we do not need to use recruitment firms as, in general, all of our candidates are directly sourced by us. In some cases such as candidates who are hired from Philippines, we use agency that facilitates the deployment process.

- Does the company pay the charges and costs associated with recruitment (agency fees, travel costs, visas, medical checks) or are these costs paid by the worker?

Yes, our hotel pays the charges and costs associated with recruitment such as agency fee, air ticket relocation of the hired colleague, Visa application fees and medical expenses of residence permit.

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

All our employees are full time workers. In some areas such as night cleaning, banqueting events, we use external companies who provide man power.

what due diligence checks does the company undertake to ensure that these third-party agencies are operating legally and ethically?

Conditions of employment

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

11. Prevent contract substitution?

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

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

All our employees go through our new hire orientation programme where they are provided with our employee hand book Empact that furnishes with the information of policies and procedures and work rules. Their bank accounts are processed and they get scheduled for the residence permit procedures. Employees are not required to hand their passports, they can keep it with themselves. Medical cards are processed. All the issuance and renewals of medical cards and ID are tracked by our Government Relations Officer.

13. Ensure timely and full payment of a wages?

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

- a. payment of minimum country-of-origin regulated salaries

Our salary scales are based on the Doha salary survey within our competitor set. We annually review our salary scale in the market and ensure that we are above the average in the market.

- b. overtime pay

Overtime are paid either in time in lieu or the rate of the base salary and 25% thereof, and the rate of the basic salary and 150% thereof if overtime was during a day off or PH.

- c. equal pay for equal work regardless of nationality

We are committed to providing a workplace in which employees are treated in a non-discriminatory manner including compensation and benefits.

- d. prevention of illegal deductions

Local Law, Work place system

- e. other pay related issues

14. Ensure the health and safety of its workers?

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

- a. health & safety training

All employees need to go through Health and Safety training. Our Safety and Loss Prevention department schedules Health & Safety training, including evacuation, CPR etc.

- b. injury prevention

- c. maximum working hours and overtime

Nine hours including 1 hour break.

- d. non-discrimination

We are committed to providing a workplace in which employees are treated in a non-discriminatory manner. We do not discriminate against any colleague on the basis of race, color, sex, national origin, religion, age, medical condition, marital status, disability sexual orientation. The policy includes recruitment, selection, transfers, promotions, scheduling, training, discipline, compensation, benefits, separation or any other term of employment.

- e. prevention of physical, sexual and verbal abuse

Our strong company culture builds and maintains trust with our employees. We live by the golden rule where we treat others and we wish to be treated. All employees need to sign Harassment policy that includes Physical, verbal and visual harassments. Failure of these can result in the disciplinary up to and including termination.

- f. any other health and safety related issues covered by the company's policies & processes

15. Issue transfer permits and exit visas?

Exit Visas are done by the hotel. Transfers/ Permits are allowed.

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

Worker accommodation

17. Does the company provide accommodation for its employees?

Yes, our company provides accommodation for all our employees. It has a swimming pool, Gym centre, Multipurpose court, Volleyball court, basketball court, Employee Dining Restaurant, Library, separate male and female laundry and detergents provided.

- if using agency staff who provides their accommodation? *Agencies*
- if employee or agency-staff accommodation is off site what checks are undertaken to ensure that all accommodation is of a decent standard?

All our employees live in our own accommodation which is managed by our Housing Team led by Staff Housing Manager and they together ensure all up to our standards. We also conduct HR checks and room visits time to time.

Grievance & remediation

18. What mechanisms does your company have in place to facilitate freedom of association and alternative forms of organizing in a context where local law restricts the ability of migrant workers to form or join trade unions?

Does your company have a grievance mechanism? If so, please describe the procedures in place to submit, process and remedy grievances.

We use C.A.R.E. process (Complaint, Arbitration & Review for Employees)

Most problems and complaints get settled by discussion of the facts between supervisor and employee. More substantial disputes are dealt through C.A.R.E process (Complaint, Arbitration & Review for Employees). C.A.R.E. works as follows:

- STEP 1:** *I will discuss the matter informally with my immediate supervisor.*
- STEP 2:** *If STEP 1 does not solve the problem, I will file a written complaint with the Human Resources Office within **14 days** after the event or problem occurred. At my request the Director of Human Resources may assist me in preparing my complaint.*
- STEP 3:** *The Director of Human Resources will conduct an investigation concerning my written complaint, including a meeting with me, within **7 days** after filing.*
- STEP 4:** *The Director of Human Resources will issue a written decision to me within **7 days** after the close of the investigation.*
- STEP 5:** *If I am dissatisfied with the written decision in STEP 4, I will appeal to the General Manager within **14 days** after STEP 4. The General Manager will meet with me and give me a written decision on my appeal within **14 days** after our meeting.*

We also have our Open Door Policy which is an open door to any manager, at any time. This policy allows the employee full access to the manager they believe can best solve their problem, including the General Manager.

For matters that elevate beyond immediate assistance of the hotel in regards to Code of Business Conduct and Ethics, colleagues can use a third party Risk Assessment System called EthicsPoint with the option to submit, on a confidential and anonymous basis which gets handled by Corporate office.

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

- a. workers have been charged recruitment fees?
All our agencies well briefed that candidates can not be charged for any recruitment fees. This has also been mentioned in the agreements with the agencies. In case if we find any agencies charging our candidates, we do not deal with that particular agency.
- b. workers have not been paid on time or in full?
We open bank account for all new hires and all our colleagues get enrolled in payroll system in a timely manner. Those who cannot get enrolled in that particular month due to cut off time, get paid in cash.
- c. workers have been victims of discrimination, physical, verbal and/or sexual abuse?
No such cases have been recorded in the last two years. We have these policies put on place and we follow the Grievance process based on those policies.
- d. workers have been threatened or faced retaliation for expressing grievances?
No such cases have been recorded. We have these policies put on place and we follow the Grievance process based on those policies.