

## 2018 Questions for Hotel Companies in Qatar *Migrant Worker Rights*

### 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	Doha Marriott Hotel	Managed	<a href="#">Katara Hospitality</a>
2	The Ritz Carlton, Doha	Managed	<a href="#">Katara Hospitality</a>
3	Sharq Village & Spa	Managed	<a href="#">Katara Hospitality</a>
4	Marriott Marquis	Managed	<a href="#">Al Faisal Holding</a>
5	Sheraton Grand Doha Resort and Convention Hotel	Managed	<a href="#">Katara Hospitality</a>
6	The St. Regis Doha	Managed	<a href="#">Alfardan Group</a>
7	The Westin Doha and Spa	Managed	<a href="#">Ghanem Al-Thani Holdings</a>
8	W Doha Hotel and Residences	Managed	<a href="#">J&amp;A Jaidah Holdings</a>

### Human rights and due diligence

- Does your company have a publicly-available policy commitment to respect human rights in its operations and throughout its business relationships<sup>1</sup>, that addresses workers' rights? Please provide links or attachments to the company's relevant policies.

**Yes, we have publicly available policies respecting human rights. They include:**

- Human Rights Policy:**  
<https://www.marriott.com/Multimedia/PDF/Corporate/HumanRightsStatement.pdf>
- UK Modern Slavery Act Global Statement:**  
<https://www.marriott.co.uk/Multimedia/PDF/CorporateResponsibility/2017%20UK%20Human%20Trafficking%20Statement.pdf>

<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, labour suppliers, and service providers**.

- Principles of Responsible Business:  
[https://www.marriott.com/Multimedia/PDF/CorporateResponsibility/Marriott Principles of Responsible Business.pdf](https://www.marriott.com/Multimedia/PDF/CorporateResponsibility/Marriott_Principles_of_Responsible_Business.pdf)
  - Business Conduct Guide:  
[https://www.marriott.com/Multimedia/PDF/CorporateResponsibility/Marriott Business Conduct Guide English.pdf](https://www.marriott.com/Multimedia/PDF/CorporateResponsibility/Marriott_Business_Conduct_Guide_English.pdf)
3. Does the company have a human rights due diligence process for identifying and prioritising workforce risks in its operations and throughout its business relationships in Qatar? If so, please explain this process and highlight the top three workforce risks relating to a) its direct operations and b) its value chains.

**Marriott implements an ongoing risk management process to identify, prevent and mitigate relevant human rights risks globally, including Qatar. We also work collaboratively with our industry association and industry peers to assess and identify relevant human rights issues that affect our industry and address those issues within our sphere of influence. We have identified forced labor, human trafficking and unethical recruitment as some the priority workforce risks affecting our business operations and throughout the value chain.**

**At the end of 2017, Marriott established [public human rights goals](#) to enhance or embed human rights criteria in our recruitment and sourcing policies and work with our industry to address human rights risks in the construction phase.**

**As a member of the International Tourism Partnership, we are also committed to implementing ITP's Forced Labor Principles, which we helped develop and launch in June 2018. The [ITP's Principles on Forced Labour](#) are:**

**I. 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.**

**II. No worker should pay for a job.**

**Fees and costs associated with recruitment and obtaining employment should not be paid by workers.**

**III. 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.**

**These collective efforts can be found on the International Tourism Partnership website:  
<http://tourismpartnership.org/human-rights/>**

4. Does your company include labour practices relating to recruitment, working, and living conditions, as part of its due diligence criteria when deciding to enter into business relationships in Qatar?

**As stated in our [Human Rights Policy](#), Marriott strives to provide a safe and healthy working environment for all employees. We have specific workplace policies pertaining to recruitment and working and living conditions.**

**On preventing unethical recruitment, Marriott managed hotels do not require payment of a fee to be considered for employment. In an effort to raise awareness of and prevent recruitment scams, we have developed guidance for jobseekers and a list of approved Marriott e-mail domains that can be found [here](#). We also do not accept job applications via email or fax. Our complete statement on recruitment scam can be found [here](#).**

5. Does your company require hotel property owners and subcontractors in Qatar to comply with your human rights and other rights-related policies and procedures?

If yes:

- a) How do you hold them accountable to these requirements (e.g. through contract clauses, brand standards) and what mechanisms do you employ to monitor and evaluate their compliance?

**Marriott expects business partners to comply with all local and relevant laws, including on human rights. We work to hold our business partners around the world to similar ethical business standards and human rights compliance we support as defined within Marriott's Global Supplier Conduct Guidelines and other relevant corporate policies. Please see our Responsible Sourcing Report:**

**[http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015\\_Reports/2015\\_ResponsibleSourcing.pdf](http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/2015_Reports/2015_ResponsibleSourcing.pdf)**

If no:

- b) Does your company engage with its hotel property owners or subcontractors on issues related to their human rights practices (e.g. through workshops, training, audits)? Please provide details.

## **Recruitment**

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

**We have a variety of ways that we recruit potential employees both in-country and in a source country. For example, we may conduct recruitment trips to source countries where we may identify, interview and/or hire employees for available roles. We may also directly engage with and hire employees locally in Qatar. We also work with vetted and approved recruitment agencies, ensuring that the agency does not charge fees, by always paying for the recruitment of workers.**

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

Please also include the following information:

- How does your company prevent the practice of contract substitution? Does your company have a policy of honouring the terms of contract signed in workers' home countries?
- If your company has a policy of no-fee recruitment, what steps does it take to ensure workers do not pay recruitment fees and related costs? How could you demonstrate that workers (both directly employed and subcontracted at your hotels) do not incur any fees?

- If your company has a policy of reimbursing fees, please describe the company's process for identifying incidences of worker-paid fees and reimbursing fees to workers (both directly employed and subcontracted at your hotels).

As stated in Marriott's [Human Rights Policy](#), 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.

We pay all of the charges related to recruitment fees to the firms including relocation travel costs, visas and government required medical checks. We do not charge any fees associated with recruitment. We understand that there may be individuals who claim to be falsely recruiting for Marriott. Our complete statement on recruitment scams can be found [here](#).

Separately, we have specific and public company goals supporting the United Nations efforts on SDG 8.7 that state:

- By 2025, 100% of associates will have completed human rights training, including on human trafficking awareness, responsible sourcing and recruitment policies and practices
  - By 2025, enhance or embed human rights criteria in our recruitment and sourcing policies and work with our industry to address human rights risks in the construction phase
8. What are the most common countries of origin of migrant workers operating in your directly employed and subcontracted workforce?

Some common source countries include India, the Philippines, Pakistan, Sri Lanka.

## Payment & wages

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

In Qatar, we hire only full time salaried employees. All employees are paid a fixed monthly salary with additions for service charge, tips, incentives and various fixed benefits. Although we manage and select the employees, the employment entity is an ownership entity with Marriott having Power of Attorney.

Currently, there is no mandated minimum wage established. We conduct external surveys to benchmark wages set for the hospitality sector. The survey information informs wage levels by brand type. We aim to pay at the 50<sup>th</sup> percentile for distinct/select brands and 75<sup>th</sup> percentile for luxury brands.

10. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are paid on time and in full, including for overtime and without illegal deductions? What steps does the company take when entities in its value chain fail to pay workers on time and in full?

We follow applicable laws related to acceptable conditions of work. Overtime is paid, as per the labour law. No deductions are made to employees' salaries without their consent. Salary deductions need to be authorized by the employee and approved by Finance and Human Resources. Deductions are made for salary advances, payment for tickets (over and above employee's entitlement), insurance for family members not covered under the employee's contractual terms, etc. Here is an example of the steps we took to address

delays in salary payment and other issues brought to our attention pertaining to a contractor for a branded property: <https://www.business-humanrights.org/en/jordan-allegations-of-labour-rights-abuse-at-st-regis-amman-construction-site>

## **Freedom of movement**

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

**Passports and IDs are not kept with the employer but handed over to the employee as soon as the required work authorizations are obtained. In some cases, the employee may request for the employer to keep only the passport for the purpose of safe keeping but is required to request this in writing.**

12. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are free to change jobs and/or leave Qatar at will and without penalty? What steps does the company take when entities in its value chain prevent workers from changing jobs and/or leaving Qatar at will?

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

## **Health & safety**

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

Areas covered may include, but are not limited to:

- health & safety training
- injury prevention
- maximum working hours per week and overtime
- sick leave
- non-discrimination
- prevention of physical, sexual and verbal abuse

**Per the Qatar Labor law, we follow laws pertaining to health and safety requirements, working hours, sick leave and other acceptable conditions of work.**

**We have Health and Safety Committees in place which conduct monthly meetings to ensure adherence and corrective action where needed. Should any incident occur, each situation would be recorded and investigated to find the root cause. We provide a variety of health and safety trainings such as on Manual Handling, Blood Borne Pathogens and Ergonomics. We conduct annual Occupational Health and Safety training and simulations, and all new associates are provided with in-depth Occupational Health and Safety training.**

**As stated in our Human Rights Policy, Marriott supports and upholds the elimination of discriminatory practices with respect to all aspects of employment and promotes and embraces diversity and inclusion within its business operations. We provide equal opportunity in all aspects of employment regardless of race, color, religion, sex (including**

pregnancy), sexual orientation, gender identity or expression, national origin, age, disability, genetic information, veteran or military status or other basis protected by applicable law. The Company strives to employ and promote the best qualified person for each job and, in so doing, will comply with all legal requirements, local laws and standards governing the jurisdictions in which the Company operates.

Marriott International promotes an open-door policy whereby any associate can approach their manager or management should they feel threatened in their work environment. We further encourage and educate associates to respect cultural differences. Any allegation is taken seriously and we would take steps should a colleague or guest overstep the line with any individual. The Guaranteed Fair Treatment (GFT) system is available to all associates, should they need to escalate any concern. Website links and telephone numbers are made available on notice boards, company website and visible areas in the properties.

## Living conditions

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

**We follow all legal requirements, local laws and standards governing acceptable conditions of work.**

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

**Human Resources has direct responsibility for accommodations provided to employees. Buildings are rented and lease agreements are 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 employees hired and managed by a third-party, the third-party agency provides accommodation for their respective staff.**

## Workforce data

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

If not, please provide information on the number of:

Employment type <sup>2</sup>	Total numbers of workers	Male	Female
Directly employed	0	0	0
Employed by property owner	4675	3630	1040

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

Employed by subcontractors (service providers)	125	113	12
Employed by subcontractors (labour suppliers)	411	370	41

16. Please specify the typical activities conducted by your:

- a) **Directly employed workforce provide support that could include: management, finance, human resources, security, purchasing, information technology, sales and marketing, banquet, spa, recreation, front office, concierge, housekeeping, culinary and food and beverage sales.**
- b) **Subcontracted workforce provide support that could include: security, restaurant staff, housekeeping, drivers, and stewarding.**

*Examples: Reception, cleaning, security, maintenance, gardening, restaurant staff, management etc.*

### **Representation & remedy**

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

**Yes, as stated in our [Human Rights Policy](#), Marriott supports the freedom of association and the right to choose a collective bargaining representative, if desired. However, there are currently no alternative forms of organizing or similar associations in Qatar for employees to join.**

18. Given legal restrictions on freedom of association and membership of trade unions in Qatar, how does your company ensure workers' voices are represented and heard by the company, e.g. through worker-representative committees? Please describe the mechanism in place.

**The company provides direct channels for workers to share their perspective, including directly with the Human Resources department. Workers can also voice their concerns using their preferred communications channels such as email or written document to Human Resources.**

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

**The company provides associates with a variety of means, including anonymous channels, to report unethical behaviour. This includes a toll-free international Business Integrity Hotline and a complimenting online channel. The Company does not tolerate any retaliation against individuals who raise concerns in good faith and has in place systems to protect such individuals.**

**Our internal audit department conducts an annual Ethical Conduct Survey across a broad section of associates, including all officers and senior managers. We provide associates with a variety of means, including anonymous channels, to report unethical behaviour. This includes a toll-free international Business Integrity Hotline.**

20. How many grievances were raised in 2017 by workers (both directly employed and subcontracted at your hotels)? Please provide a summary of the grievances and the remedial actions that were taken by the company and its subcontractors, and whether follow up actions were taken to check if workers were satisfied with the outcome.

**During 2017, three substantiated worker grievances were raised in Qatar. The grievances all related to concerns of the conduct of managers. A full investigation was conducted and recorded with each case and corrective action was taken against the concerned managers, up to a dismissal. Each associate was contacted after the corrective action was taken and received feedback of the outcome.**

#### **Other information**

21. 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?

**As a management and franchise company, we hold our business partners around the world to similar ethical business standards and human rights compliance defined within our policies. While we do not typically own nor construct hotels, we are committed to partnering with the broader hospitality industry to raise awareness of and prevent forced labor in the recruitment process and in other supporting industries, such as the construction sector. More information can be found at:**

**[https://www.tourismpartnership.org/wp-content/uploads/2018/06/ITP\\_Forced-Labour-Infographic\\_v7-copy.pdf](https://www.tourismpartnership.org/wp-content/uploads/2018/06/ITP_Forced-Labour-Infographic_v7-copy.pdf)**