

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

**Scope of operations**

1. 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 Project Management

**Human rights and due diligence**

2. 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.

***Banana Island Resort Doha by Anantara*** supports and protects human rights wherever possible. As a responsible company, we believe that our goals, beliefs and principles are the foundation of the work that we do every day and we are committed to complying with the laws and regulations of the countries and jurisdictions in which we operate.

***Preface***

*Banana Island Resort Doha by Anantara acknowledges and respects the principles contained in the Universal Declaration of Human Rights. Banana Island Resort's Human Rights Policy reflects the Company's commitment to conduct its business in a manner consistent with these principles and to protect human rights within the Company's sphere of influence. Banana Island Resort demonstrates global leadership in responsible workplace practices, and endeavors to conduct its business operations in a manner that is free from complicity in human rights abuses. The Company's culture embodies a commitment to ethical business practices and good corporate citizenship.*

***Ethical Business Conduct***

*Banana Island Resort's policies require that its business be conducted with honesty and integrity, and in full compliance with all applicable laws. Company policies establish clear ethical standards and guidelines for how we do business and establish accountability. All company team members are trained and required to obey the law and comply with specific standards relating to legal obligations, ethics, and business conduct. The Company has*

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<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**.

clear accountability mechanisms in place to monitor and report on compliance with these directives.

### **Protection of the Rights of Children**

*Banana Island Resort's condemns all forms of exploitation of children. The Company does not recruit child labor, and supports the elimination of exploitative child labor. Banana Island Resort also supports laws duly enacted to prevent and punish the crime of sexual exploitation of children. Banana Island Resort will work to raise awareness concerning such exploitation, and will cooperate with law enforcement authorities to address any such instances of exploitation of which the Company becomes aware.*

### **Protection of the Rights of Associates**

*Banana Island Resort supports and upholds the elimination of discriminatory practices with respect to employment and occupation, and promotes and embraces diversity in all aspects of its business operations. Banana Island Resort further supports the elimination of all forms of forced, bonded or compulsory labor and the freedom of association.*

3. Does the company have a human rights due diligence process for identifying and prioritizing 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.

*Banana Island Resort Doha by Anantara has strong commitment to support the human rights for all people. We work collaboratively with our industry association and industry peers to identify relevant human rights issues that affect our sector and address those issues within our sphere of influence.*

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

*Banana Island Resort Doha by Anantara requires all are partners to comply with local laws & legislation. Legal documentation related to validity of operating licenses for all contractors are reviewed in prior to enter into business. Agency those provide casual labor are asked to provide copies of residency/work permit documentation for all staff being engaged along with a food handlers certificate if required. We are committed to ensure that the said companies adhere the legal rights of their worker and provide them with all the required facilities.*

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?

*Banana Island Resort requires all are partners to comply with local laws & legislation. Legal documentation related to validity of operating licenses for all contractors are reviewed in prior to enter into business. Agency those provide casual labor are asked to provide copies of residency/work permit documentation for all staff being engaged along with a food handlers certificate if required. We are committed to ensure that the said company adheres the legal rights of their worker and provide them with all the required facilities. We have records of regular Site Inspections of Housing and Living conditions – even for our outsourced manning. Such records are available in the HR Housing department at any time.*

## **Recruitment**

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

*In Qatar, we hire only full-time salaried team members. All vacancies are posted on the company's career website and open to any applicant to apply (<https://www.minorhotels.com/en/careers/opportunities>). This website is also used to receive the application from internal team members within the Banana Island Resort. Candidates go through screening process based upon the job profile, shortlisted candidates go through sequences of interviews HR, Department Head, and Division Head/Area General Manager if deemed necessary. After successful candidate has been selected and references check completed, a communication is sent to all applicants accordingly for further processing.*

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. 90% of the full time recruitment is done directly with candidates through company website or email. Interviews and communication are made directly with candidates.

*Banana Island Resort maintains compliance with all applicable laws relative to equal employment and fair employment practices in all regions wherein we operate.*

*Banana Island Resort does not make a job offer without completing a full recruitment process including formal interviews and professional verifications. Banana Island Resort does not ask applicants to provide personal information (outside of what is typically included in a resume) to be sent via email and will never ask prospective applicants to provide any information to an email address not ending in "@anantara.com". Banana Island Resort does not ask an applicant to provide payment of fees as part of a job*

*application process. Banana Island Resort supports and protects human rights wherever possible. As a responsible company, we believe that our goals, beliefs and principles are the foundation of the work that we do every day and we are committed to complying with the laws and regulations of the countries and jurisdictions in which we operate. The above can be accessed while using the following Link. The above information is duly share with each applicant during the recruitment process regardless of source they come through in order to uphold our policies and responsibilities towards them*  
*<https://www.minorhotels.com/en/careers/opportunities>*.

*SUBCONTRACTED: - Our business structure limits our sphere of influence however we work to make sure that our business partner are following the Human Rights policy and is an equal opportunity employer.*

Please also include the following information:

- How does your company prevent the practice of contract substitution? Does your company have a policy of honoring the terms of contract signed in workers' home countries?

*Offer letters and contracts sent to the successful candidates are legally binding, and upon arrival contracts are attested in the government. For some nationalities, the contracts are being attested by ministry of labor and country of origin's embassy and sent to candidate.*

- 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?

*Banana Island Resort does not ask an applicant to provide payment of fees as part of a job application process. Before we enter into a contract with any third party recruitment agency, we always make sure we put down the strong clause in regards to no recruitment fee, and a zero tolerance policy is followed for such incident which also leads to the termination of contract with such partner. This clause is being explained to candidates during interviews to ensure awareness and checking directly with the successful candidates is being done.*

- 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).

*Banana Island Resort does not ask any applicant to provide payment on their behalf, in an event where an applicant is required to complete some legal formalities in his/her home country, we ensure that he/she is been reimbursed for that while keeping this in writing.*

8. What are the most common countries of origin of migrant workers operating in your directly employed and subcontracted workforce?

*Banana Island Resort is an equal opportunity employer and being a multicultural company we have more than 50 nationalities working with us and we do not have consistent, specific countries.*

### **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.

*Salary scales are set by position. Annual market surveys are being conducted both locally (between hotels of same category) or through corporate offices. Salaries are reviewed annually to ensure competitive packages.*

*SUBCONTRACTED: - Working currently on a procedure to ensure subcontracted companies and compliance with the local minimum wage*

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?

*The Hotel is registered under the WPS (Wage Protection System) in Doha; all salaries are sent to the bank accounts. No deductions are made to team members' salaries without their consent. Salary deductions need to be authorized by the Team Member and approved by Finance and Human Resources. Deductions are made for salary advances. We as a global and a choice of employers always ensure that all our team members are paid in a timely manner.*

*SUBCONTRACTED: We work to make sure that our business partner has a policy in place for the above and does not malign the rights of their team members, Banana Island Resort follows a Zero Tolerance Policy for such incident, which all are vendors made aware of it, prior to entering into a business with them.*

### **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?

*All our team members go through our New Hire Orientation induction program where they are provided with our Associate Hand Book that furnishes with the information on policies*

*and procedures and work rules. Their bank accounts are processed and they get scheduled for the residence permit procedures.*

*Passports: Hotel does not keep the passports. All passports are with the individuals.*

*IDs: Kept by team members, as this is a local requirement that everyone living in Qatar needs to carry his or her ID at all times.*

*SUBCONTRACTED: Should any of our business partner are found to breach this conduct, Banana Island Resort follows a Zero Tolerance Policy.*

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?

*Banana Island Resort follows the local laws for this and does not prevent any of its team members to change job or leave Qatar. We share such information with all our team members during their orientation and also update them with the additional information as and when it is available.*

*SUBCONTRACTED: Our business structure limits our sphere of influence however we work to make sure that our business partner are following the local laws and policy for this.*

## **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

*All team members are required to go through Health and Safety training. Our Safety and Security Department schedules Fire Prevention & Safety Training, Health & Safety training, including evacuation, etc.*

- injury prevention

*This is covered in our Associate Hand Book.*

- maximum working hours per week and overtime

*48 Hours per week excluding break times*

- sick leave

*Two (2) weeks per year paid 100% monthly basic salary,*

*If it extends beyond two weeks, then paid 50% monthly basic salary for the next weeks*

- non-discrimination

*We are committed to providing a workplace in which team members 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.*

- prevention of physical, sexual and verbal abuse

*Our strong company culture builds and maintains trust with our team members. We live by the golden rule where we treat others and we wish to be treated. All team members need to sign our "Code of Conduct". Failure of these can result in the disciplinary actions up to and including termination.*

*These all above Terms and Conditions are covered in our Team Member Hand Book.*

### **Living conditions**

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

*Human Resources has direct responsibility for accommodations provided to our team members. Buildings are rented and lease agreements signed following inspections of the buildings including the required meeting of all local laws of the country.*

*The third-party agency provides accommodation for their respective staffs.*

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?

*Team Member accommodation is managed by the Hotel; full team has been hired to take care of the accommodation. Regular and random checks are being done by HR and Senior Management to ensure quality and level of services.*

*At Banana Island Resort we make sure that everyone has been provided with a fully standard accommodation with all the required facilities. All our team members receives the adequate information upon their arrival which consist all the above information in their handbook.*

*The third-party agency provides accommodation for their respective staffs. Our business structure limits our sphere of influence however we ensure that all our business partners adhere the living standard for their team members.*

## 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	607	511	96
Employed by property owner	-	-	-
Employed by subcontractors (service providers)	-	-	-
Employed by subcontractors (labor suppliers)	-	-	-

16. Please specify the typical activities conducted by your:

a) Directly employed workforce

*All Major Departments*

b) Subcontracted workforce

*We do not have consistent, specific categories however they are mostly used in security, restaurant staffs, cleaning, maintenance, & landscaping.*

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.

*We CARE for our team members and most problems & complaints get settled by discussion of the facts between Department Heads and Team Member keeping Human Resources Department informed. More substantial disputes are dealt through Human Resources and Top Management via;*

• *STEP 1: A team member will discuss the matter with his/her Department Head.*

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<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.



- *STEP 2: If STEP 1 does not solve the problem, he/she will file a written complaint with Human Resources Office within 14 days after the event or problem occurred.*
- *STEP 3: HR Manager will conduct an investigation concerning his/her written complaint, including a meeting with, within 7 days after filing.*
- *STEP 4: HR Manager will issue a written decision to a team member within 7 days after the close of the investigation.*
- *STEP 5: If a team member is dissatisfied with the written decision in STEP 4, he/she will appeal to the Area General Manager within 14 days after STEP 4. The Area General Manager will meet with him/her and give him/her a written decision on their appeal within 14 days after our meeting.*

*In addition to above we follow an Open Door Policy to all levels, at any time. This policy allows the team member full access to all Managers they believe whom can best solve their problem, including the Area General Manager. For matters that elevate beyond immediate assistance of the hotel in regards to Code of Business Conduct and Ethics, team members can option to approach Corporate Office in confidential way.*

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.

*Banana Island Resort follows an open door policy to ensure that each of our team members should be able to address their concerns any time in addition to this we conduct the departmental meeting in presence of the Human Resources and Hotel conducts direct line meetings for each level of team members to share their concerns. Each team member at Banana Island Resort can access the following link in order to share their concern with our Top Management.*

*Hear Your Say Suggestion Mail Box - <https://www.suggestionox.com/r/UPostd>*

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.

*Banana Island Resort has earned an enviable reputation internationally that is built, in part, on our commitment to doing business in a manner that complies with applicable laws and is, and is perceived to be, consistent with the highest ethical standards. Banana Island Resort provides its team members with several ways, including an anonymous channel to report unethical behavior. 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.*

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.

*As per Qatar Law Only*

**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 explained in the above questions, the challenge is for monitoring the compliance of the local subcontractors which we are currently working on through changing our approach and way of working in the tendering processes and adding very specific criteria for those companies should they wish to work with us. By doing this , agencies will be obliged to provide evidences and documentation for work and living conditions as well as ethical recruitment for their staffs.*