

2018 Questions for Construction Companies in Qatar
Migrant Worker Rights
VINCI / QDVC

Name of company:

VINCI/QDVC

Headquarters address:

VINCI

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QDVC (51% Qatari Diar, 49% Vinci Construction Grands Projects)

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<https://www.vinci.com/vinci.nsf/en/index.htm>

<http://www.qdvc.com/index.php/en/>

1)

- a) Please describe the scope of your company's operations in Qatar, including reference to the company's current projects and any labour rights standards governing these projects.

VINCI has a stake in QDVC, a Qatari Shareholding Company incorporated under the Law of Qatar since April 2007. The percentages held by each shareholder of the company are as follows: **51%** by Qatari Diar Real Estate Investment Company, incorporated in Qatar and acting as the Qatari partner; and **49%** by VINCI Construction Grands Projets, incorporated in France and acting as the non-Qatari Partner.

QDVC specializes in large Design and Build projects in construction, civil engineering and contracting. Our current projects include the first Qatari Lusail Light Railway Transportation system (LRT), the Doha Metro Red Line South (RLS) and the New Orbital Highway (NOH2).

The LRT and RLS projects are being delivered to Qatar Rail and governed by the *Qatar Foundation Mandatory Standards of Migrant Workers' Welfare for Contractors & Sub-Contractors*. NOH2 is part of the Expressway Program delivered to Ashghal and is governed by the *Ashghal Mandatory Standards and Guidance for Construction Workers Accommodation and Welfare*.

- b) List your company's business relationships on its current projects, including with business partners¹ and entities in its contracting chain.² If your company maintains this information publicly, please provide a link or attachment to it.

QDVC has three main projects: LRT, RLS and NOH2.

The LRT and RLS projects are being delivered for Qatar Rail.

¹ i.e. joint venture partners, State and non-State clients, and State and non-State project financiers

² i.e. subcontractors, recruitment agencies, and labour supply companies in countries of origin and destination

The first phase of the LRT Project was 100% managed by QDVC between 2008 and 2014; the final phase of the project (2014-2020) is being executed in a consortium with Alstom.

RLS is a joint-venture with GS Engineering & Contracting (South Korean partner) and Al Darwish Engineering (Qatari partner).

NOH2 is a joint-venture with Bin Omran (Qatari partner).

In 2017 and 2018, QDVC employed around 180 sub-contractors across its various projects, including 7 major labour suppliers. QDVC CSR department has developed a functional database which lists the manpower providers and subcontractors currently working on its projects and their CSR performance in terms of labour accommodation and labour rights, which is available internally.

Regarding recruitment agencies, QDVC has not conducted major direct recruitment campaigns since 2016. Details of the recruitment agencies we worked with previously are available in the 2016 survey responses.

2) Does your company maintain public workforce data? If yes, please provide a link or attachment

The link below provides key facts and figures pertaining to QDVC for the year of 2017.

<http://www.qdvc.com/images/pdf/report-2017-en.pdf>

If not, please provide the information on the number of:

a) Directly employed³ workers on your current projects, and their countries of origin

Nationality of QDVC Directly Employed workers as of 30th June 2018		
Bangladesh	1 129	46%
India	1 104	45%
Nepal	114	5%
Sri Lanka	61	2%
Philippines	41	2%
Pakistan	12	0%
Others	18	1%
Total	2 479	100%

b) Workers employed by subcontractors on your current projects

The total number of workers employed by subcontractors on QDVC projects is 12,039 in July 2018. QDVC policy is to direct-hire as much as possible, which we do for main civil works and plant activities. Our activities, especially in the final phases of delivery of the rail and road projects, have been increasingly involving systems, MEP (mechanical, electrical and plumbing) works and testing and commissioning, for which specialized contractors are employed.

c) Workers employed by labour supply companies on your current projects

The number of our workers can vary significantly depending on the different phases of delivery of our projects. In July 2018, we had a total of 5,070 workers performing QDVC own scope of works (civil and plant). 3,011 workers were employed directly by QDVC and its JV partners and 2,059 workers were employed by labour suppliers. Among the 3,011 workers, 2,479 are under the direct sponsorship

³ A directly employed worker is a worker with whom you have a contract of employment and to whom you pay wages

of QDVC and the rest were employed by our JV partners GS Engineering and AI Darwish on the RLS-JV Project. The table below summarises the breakdown between QDVC direct workforce and its outsourced workers.

Labour employed on QDVC projects (July 2018)	Labour	%
Directly Employed by QDVC or the JV partner	3 011	59%
<i>QDVC direct employees</i>	2479	
<i>JV-partner direct employees</i>	532	
Labour Suppliers	2 059	41%
Total	5 070	100%

Human rights policy & due diligence

- 3) Does your company have a publicly-available written policy to respect human rights in its operations that addresses a) the rights of workers employed by the company and b) the rights of workers employed by subcontractors, labour supply companies and other entities in the company's subcontracting chain? Please provide links or attachments to the company's relevant policies.

VINCI has been a signatory to the **UN Global Compact** since 2003, committed to support and promote respect for human rights within its sphere of influence and to ensure that Group companies are not complicit in human rights abuses.

In April 2017, VINCI published its **Guidelines on Human Rights**. The text is a publicly-available policy which formalizes the group's commitment to human rights issues in its operations worldwide: https://www.vinci.com/publi/manifeste/VINCI-Guide_on_Human_rights-En.pdf. The guidelines identify the main risks associated with human rights and a common set of principles and rules to be followed in all countries where VINCI operates, in all its businesses and companies. An **Annex to the Guidelines** is available internally for all the employees. Addressed as much to the social responsibility enablers as to operational managers, it provides detailed information on the principal human rights problems that can be encountered and the concrete actions to carry out in order to prevent human rights breaches in the businesses. More information on VINCI's commitment to fundamental social rights can be found online:

https://www.vinci.com/vinci.nsf/en/sustainable-development/pages/human_rights.htm.

QDVC issued its standalone **Workers' Welfare and Human Rights Policy** in July 2016, available in the Company Manual and signed by the CEO. It explicitly covers the areas where human rights risks are prevalent in Qatar and the fundamental rights of workers employed by QDVC and its supply chain (subcontractors and labour suppliers).

Resulting from discussions that began in December 2014, QDVC and VINCI also signed on 21st November 2017 with the Building and Wood Workers' International (BWI) a **Framework Agreement on Worker's Fundamental Rights**.

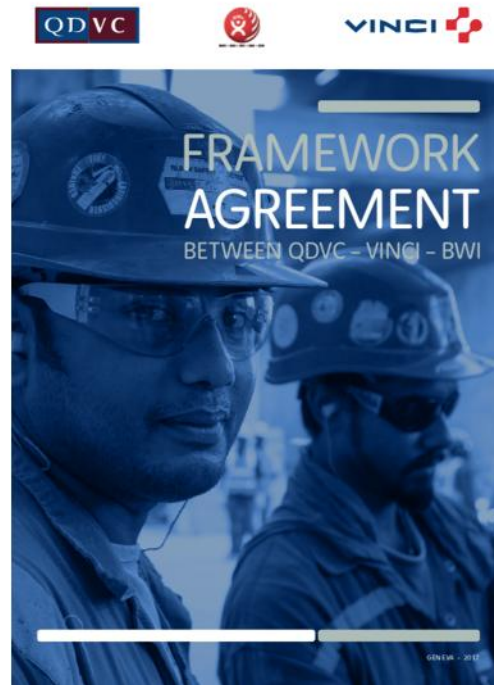
The agreement was officially signed in Geneva in Switzerland at the International Labour organisation (ILO) in the presence of its Director General Guy Ryder.

Built on the same structure as QDVC and VINCI's human rights policies, the agreement covers the following chapters: recruitment and migration, working conditions, living conditions, human rights in the supply chain and grievance mechanisms. Its principles cover all employees working for QDVC in Qatar, including labour suppliers, sub-contractors and co-contractors. The agreement also includes an extensive system of follow-up, auditing and reporting under the authority of a reference group composed of representatives of the three parties. It is available online via the following link:

[https://www.vinci.com/commun/communiqués.nsf/04438CA8C4A62422C12581DF00384D96/\\$file/Agreement-cadre-En.pdf](https://www.vinci.com/commun/communiqués.nsf/04438CA8C4A62422C12581DF00384D96/$file/Agreement-cadre-En.pdf).

The agreement was publicly endorsed by Sharan Burrow, the General Secretary of ITUC (International Trade Union Confederation), during the public event organized for the release of the Global Deal Flagship Report 2018, of which VINCI is a partner:

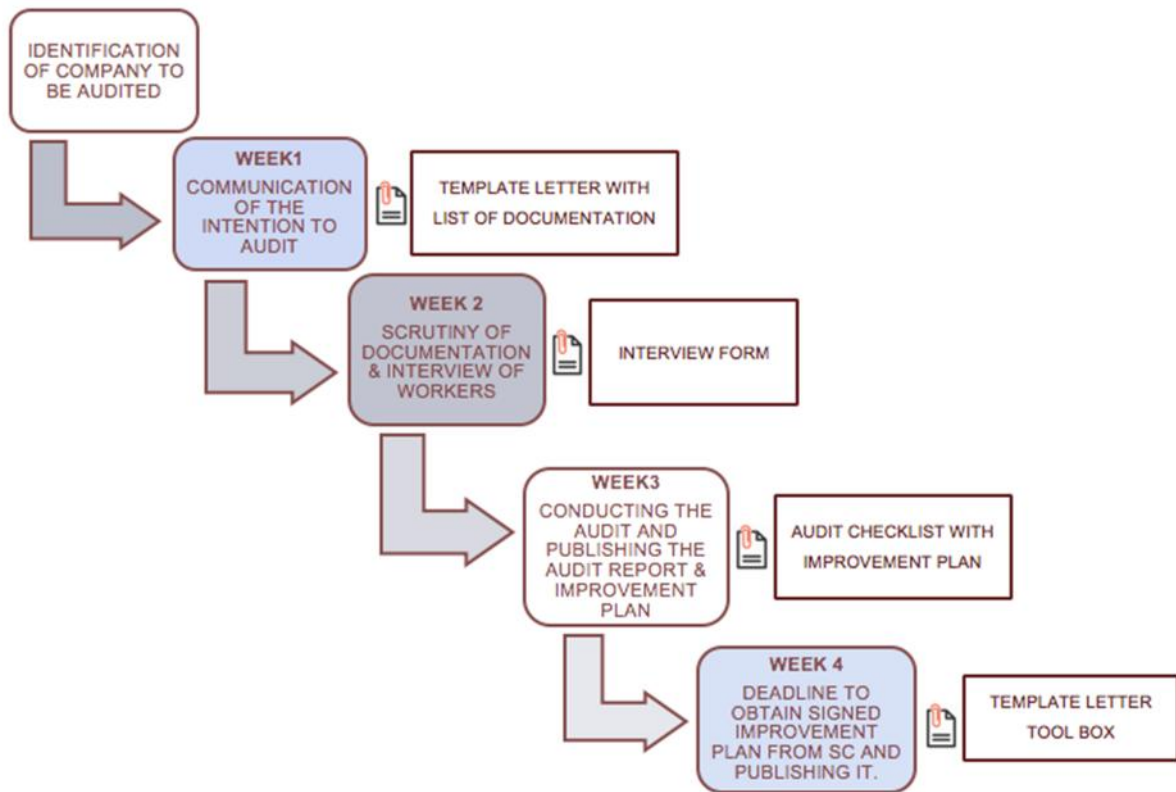
https://oecd.tv.webtv-solution.com/4796/or/inclusive_growth.html.



- 4) Does your company require subcontractors and other entities in your contracting chain in Qatar to comply with your human rights and other rights-related policies and procedures?

QDVC subcontractors and labour suppliers are required to comply with the Qatar Labour Law and all QDVC policies and procedures on health & safety, accommodation, labour rights and workers' welfare. Furthermore, the Framework Agreement on Workers' Rights between QDVC, BWI and VINCI is applicable to QDVC subcontractors and labour suppliers.

QDVC initiated **labour accommodation inspections of its subcontractors** as early as 2012 and made them systematic in 2014. Exhaustive **labour rights audits** of our labour suppliers and subcontractors have been conducted since 2015 to verify compliance with the Qatar Labour Law requirements on recruitment, sponsorship, contracts, wages payment, working conditions, medical insurance, access to information about rights and grievance mechanisms. Labour rights audits are conducted as illustrated below:



- a) How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?

QDVC has a policy in place related to **CSR due diligence in the subcontracting process** which holds its subcontractors and labour suppliers accountable to minimum safety and welfare requirements on all its projects. This is done through various means including contract clauses, training, monitoring, auditing and a penalty scheme that are detailed below. Its main components are as follows:

- In order to mitigate human rights and forced labor risks in its operations, QDVC is committed to contract exclusively with manpower providers and subcontractors who commit to reach full compliance with the Qatar Foundation (QF) or Supreme Committee (SC) Workers' Welfare Standards.
- Contracts with labour suppliers and subcontractors lists the requirements on health & safety, accommodation and labour rights that have to be reached in priority (10 minimum requirements on workers' accommodation and 14 requirements on labour rights).
- In its contracts, QDVC reserves the right to conduct audits and spot-checks of the subcontractors' health & safety practices, living facilities, HR policies and labour practices.
- The following prerequisites have to be fulfilled before a subcontract can be awarded:
 1. The subcontractor's worker accommodation must be audited.
 2. A self-assessment questionnaire on Qatar Labour Law requirements (administrative management of key human resources issues such as recruitment conditions, freedom of movement, contract, working hours, health insurance and access to grievance mechanisms) has to be submitted in pre-qualification stage.

3. An improvement plan is to be formally submitted, for both accommodation and labour rights items, with a clear timeline indicating when the subcontractor will reach full compliance.
- A defined regime of periodic follow-up audits guarantees the implementation of the improvement plan.
 - Repeated non-compliance with the accommodation and labour rights agreed improvement plan shall result in the application of financial penalties, payment suspension, contractual restriction or termination of the subcontract depending on the severity of the non-compliance and the pro-activity of the subcontractor to resolve them.

STEP 1	Meeting with subcontractor to remind contract requirements
STEP 2	Re-house labour in compliant accommodation,
STEP 3	Financial penalties,
STEP 4	Suspend payments or contract termination.

- The CSR audit results are part of the criteria assessed in the final performance evaluation of the subcontract. The CSR score of the subcontractor, based on the average score between the final accommodation audit and labour rights audit results, helps define whether, at the end of the contract, a subcontractor is recommended for a future tender or not.

On this basis, the QDVC CSR department created a **functional CSR Subcontractor database** to have a bird's eye view of the manpower providers and subcontractors currently working on its projects and their CSR performance. Key features of the database include information such as package size, due diligence actions undertaken with subcontractors, initial and latest scores of accommodation and labour rights audits and overall CSR Score. It also has details of our **CSR KPIs related to subcontractors**. When available, the database also lists the subcontractors who previously worked with QDVC but are not currently onboard and those who have failed in the pre-qualification stage because of poor CSR performance. The database is shared and updated regularly through reports and information shared with the operation teams.

b) Do you enforce compliance beyond the first-tier of your contracting chain? What challenges does the company face in ensuring subcontractor compliance, both in the first and subsequent tiers?

In order to enforce compliance beyond the first-tier of our contracting chain, QDVC has strict specifications in the general conditions of its contracts with subcontractors and labour suppliers, whereby:

- QDVC reserves the right to conduct accommodation and labour rights audits and assessments at any time of the sub-contractor **and its lower-tier sub-contractors**, including their head office, their premises and accommodation units.
- The sub-contractor shall comply and **ensure its lower tier sub-contractors comply** with the Welfare Standards and the Corporate Social Responsibility standards specified in the contract throughout the term of the sub-contract.
- In order to avoid any doubt, the contract specifies that the sub-contractor' lower tier sub-contractor/s and manpower providers abide by the requirements and that the sub-contractor

shall be and remain solely responsible towards QDVC for his lower-tier subcontractor's non-compliance (including manpower providers in any tier) or faulty compliance.

QDVC CSR Department has prepared material to support the procurement teams in the clarification of QDVC welfare requirements during the tender and execution phase of the contract.

Additionally, QDVC has conducted **training to equip its main sub-contractors** with adequate tools to perform accommodation and labour rights **audits of their lower-tier subcontractors**. QDVC has also shared with some entities in its supply chain information regarding the providers it has blacklisted and whitelisted on CSR grounds.

The **challenges** faced by QDVC are as follows:

- The employee turnover can be high among certain labour suppliers and subcontractors, even though employee turnover is also a contractual requirement from QDVC. This complicates QDVC's ability to make exhaustive checks and controls.
- Despite strong contractual clauses, it is difficult to obtain from our first-tier sub-contractors close monitoring over their own supply chain on workers' welfare issues. They are not always equipped to perform such tasks.
- For the projects which are in a final delivery phase, tight time-constraints make it difficult to exert leverage towards the end of a contract with a sub-contractor, particularly when the client's priority is likely to be laid on the completion of the works.
- A recurring feature in the labour market has been the limited number of work visas for the main migrant worker nationalities that are available to subcontractors and manpower providers to recruit sufficient number of workers. As an outcome, subcontractors may resort to lower-tier labour suppliers or employ workers under temporary business visas.

Recruitment

- 5) Please describe your company's process for recruiting migrant workers to be part of your directly employed workforce in Qatar.

QDVC hires mainly from India, Bangladesh, Nepal, Sri Lanka and the Philippines. QDVC sends its own team of recruitment officers to conduct interviews and trade testing of workers. However, please note that QDVC cannot recruit directly from the countries mentioned; each of these countries has a list of licensed recruitment agencies that are allowed to recruit for foreign companies and QDVC has to choose suitable agencies from within this list.

Since its inception, QDVC has covered the costs of recruitment services, provided work visas, flight tickets, medical tests, insurance and residence permits for its newly hired workers. QDVC Service Agreements with recruitment agencies have always **prohibited collection of any amount of money from the workers** in exchange of a job offer. In 2015, QDVC undertook even more stringent due diligence measures regarding the recruitment process:

- A **detailed inquiry** was conducted to identify various steps during which a worker can be unduly charged by intermediaries before meeting the QDVC recruitment team.
- **Warning letters** were sent to the various agencies with whom we were working.
- Our Service Agreement with recruitment agencies strictly prohibits them to use anyone else than their own registered agents to source and pre-select candidates.
- All **advertisements** in local newspapers in the native language is validated beforehand by QDVC, and explicitly **mentions a "Free Recruitment" policy**.
- The trade tests, interviews, selection process, signature of the offer letter and orientation sessions are conducted and delivered in the **native language**.

- A **Workers' Rights and Induction Booklet** (created by QDVC in July 2015 and available in English, Hindi, Bengali and Nepali) is distributed to future employees to explain the recruitment and mobilization process, fundamental rights and information regarding the working and living conditions in QDVC. This is followed by another induction upon arrival.

QDVC recruitment processes are formalized via an internal policy (cf. answer to question 6).

- 6) Does your company have a publicly-available written policy to respect migrant workers' rights that addresses the specific risks migrant workers face during recruitment? Please provide links or attachments to the company's relevant policies.

Yes, QDVC has created a **QDVC Workers' Welfare Human Rights Policy** available in the Company Manual (cf. question 3). It entails the guideline and practices to improve recruitment, working and living conditions of all workers on construction sites in Qatar.

<http://companymanual.qdvc.net/gdvc/manuelentrepriseqdvc.nsf/document.htm?openagent&language=ang&uid=f1afe45ae3c0cc50432580160044796c>

VINCI joined in 2017 the **Leadership Group for Responsible Recruitment** convened by the **Institute for Human Rights and Business (IHRB)**. Majority of the IHRB's work revolves around how workers are recruited, payment of recruitment fees to recruitment agencies and the eradication of debt bondage in the next 10 years. Companies joining the Leadership Group also commit to take a public stance on the issue of recruitment, which QDVC and VINCI have done in many instances.

<https://www.ihrb.org/focus-areas/migrant-workers/bwi-vinci-qdvc-framework-agreement>

<https://www.ihrb.org/news-events/press-centre/ge-mars-inc-tesco-vinci-join-leadership-group-for-responsible-recruitment>

- a) 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?

As explained earlier, QDVC uses local agencies in each country of hire. Advertisements for vacancies are published in the local language which are then published in local press publications. The terms of contract and employment to future workers are expressed both orally and in writing in a language they understand. Once the worker agrees to the terms, the recruiting agency and the newly hired worker both retain one copy of the "Offer of employment", which is identical to the one that will be signed in Qatar. The process is monitored by a delegation of QDVC staff. When the worker has joined QDVC in Qatar, he signs the actual "Employment Contract" that stipulates the promised terms of remuneration, wages, hours of work including overtime entitlement, days off and annual leave, probation period, notice period and conditions for termination of each party. Lastly, the Qatari Ministry of Labour attests all QDVC contracts and the worker keeps one certified copy.

- b) 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?

In addition to the processes explained in the previous questions, we take the following steps:

- The QDVC team take advantage of the multiple opportunities during the various recruitment steps to inform **candidates** that the company pays the full cost of recruitment and that no other fee will be collected from them before and after they are mobilized to Qatar.

- A temporary **hotline** is activated during the recruitment phase to communicate directly with the QDVC recruitment officer in case the candidates have any question.
 - QDVC **systematically interviews** newly-arrived employees to enquire whether they have paid fees and follow-up interviews are conducted at a later stage to double-check the previous results. Records of the interviews are kept.
 - QDVC also takes the opportunity of its bi-annual **CSR Workers' survey** to ask questions related to recruitment.
- c) 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.
- QDVC has developed a policy of preventing recruitment fees by reinforcing its recruitment processes and taking the steps to prevent recruitment fees as early as possible in the recruitment process, as has been described in question 5. As a result, workers do not pay fees to secure employment with QDVC. We have the following processes in place to identify potential incidences:
 - A **systematic survey** is conducted upon arrival to verify that no fees have been charged.
 - If the workers have been unrightfully charged, we **mandate the recruitment agencies** to reimburse the expenses incurred. In September 2016, QDVC successfully obtained the reimbursement of 76 of our workers who had been victims of the recruitment process in their country of origin before arriving in Qatar.
 - In addition to this, one of QDVC's main manpower providers began the **reimbursement of recruitment fees** of its workers on QDVC projects in February 2018. Each month 10 Bangladeshi workers receive a sum of QAR 850 each. CSR and labour surveys carried out by QDVC have shown that Bangladesh charges one of the highest recruitment fees in South East Asia. Since February, close to 60 workers have been reimbursed. The initiative kicked off at the LRT project and has been making rounds on throughout all QDVC projects.
- d) How do these policies apply to the recruitment agents you engage and to labour suppliers and subcontractors who have workers on your projects?

With regards to the **recruitment agencies** QDVC is working with, the process has already been described in question 5.

With regards to **labour suppliers and subcontractors**, the following policy is applied:

The prohibition of recruitment fees is clearly **stipulated in our contract** with labour suppliers and subcontractors. It is one of the 14 main requirements on labour rights. The following points are specifically required:

- The local recruiting agencies used by the SUB-CONTRACTOR are licensed in Qatar.
- Foreign recruiting agencies used by the SUB-CONTRACTOR are not blacklisted by any embassies in Qatar.
- The SUB-CONTRACTOR doesn't charge recruitment fees to the workers and monitors the recruitment agencies and/or manpower suppliers (if any) that work for the SUB-CONTRACTOR, in order to prevent, avoid and report illegal practices.

The implementation of free recruitment for the workers is one of the key items of the **labour rights audits of subcontractors** conducted by QDVC. **Anonymous interviews** of workers are conducted by QDVC auditors to check the subcontractor's management declarations on the

situation. QDVC requires its subcontractors to have a formal free recruitment policy, to review their service agreements with recruitment agencies if need be, to systematically research and document whether their employees have paid fees during the process and to reimburse them should it happen. QDVC also shares with all the subcontractors audited a **toolbox** of documents to help them implement a fair recruitment policy (interview forms, service agreement template, workers' rights booklet, whitelist of recruitment agencies, etc.).

Random checks on site are also carried out throughout the year to check if workers have paid fees to secure employment.

In 2018, QDVC was selected by the **International Labour Organization** (ILO), in close cooperation with the Qatar Ministry of Administrative development, labour and social affairs, to be part of a **pilot project focused on ethical recruitment among manpower agencies and suppliers**, with the ultimate objective to create a recruitment fee-free corridor between sourcing countries and Qatar. On May 27th 2018, QDVC signed a Memorandum of Understanding (MoU) with the ILO to formalize its involvement in the project in the presence the Director of the ILO Programme in Qatar, Houtan Homayounpour and H.E Eric Chevallier, French Ambassador to Qatar.

In the wake of the signature of the MoU, an **audit** of the recruitment practices of one of QDVC's main labour supplier was conducted by **Verité**, a worldwide NGO specialized in labor and human rights in global supply chains. This will be followed by the implementation of a **capacity-building programme** post-summer 2018. Finally, a follow-up audit and an **impact assessment study** will be carried out by an American University. If the pilot project leads to positive results, QDVC will have acquired practical tools to **generalize fair-recruitment in its supply chain**. The return on experience and good practices are also likely to be shared by QDVC and the ILO with the rest of the construction industry in Qatar.

Payment & wages

- 7) What is your company's process for determining the wages of its workers in Qatar, and what external benchmarks does it use to set wage levels? Does your company consider a living wage in setting its wage amounts? Please explain.

QDVC wages are based on skills and experience. QDVC has wage ranges for each management level, according to qualification and skills. These ranges have similar length and overlap and are compared and **benchmarked** with available information from our competitors, joint venture partners and manpower providers. QDVC aims to be slightly above the market average to be able to attract good talent.

QDVC covers the living expenses when setting its wage amount, as 100% of all housing, transportation and food of the workers is provided by the company.

Every two years, a large worker's survey is conducted where QDVC monitors the level of satisfaction of its employees regarding the working conditions, including salary and benefits. The study also looks at the **average remittances** sent to the country of origin and their use (housing, everyday expenses, education, savings) and the average proportion of salary spent in Qatar and its uses (food, entertainment, communication).

Additionally, VINCI and QDVC commissioned an **independent study** conducted by a CSR consultancy called **Utopies** to look into the financial revenue of migrant workers. The study calculates the net worker remittances sent to India, Nepal and Bangladesh and measures these **net remittances' socio-economic impact** in home countries using the LOCAL FOOTPRINT® model, in terms of job creation across economic sectors, household consumption and GDP impact.

8) Does your company operate on a contractual “pay when paid” basis in relation to:

a) Subcontractors?

No. We have never operated on a « pay when paid » basis as the scope and risk of the projects would place too high a burden on our supply chain for subcontractors and suppliers to wait for payment milestones in the main contract to be paid by the client before making associated payments downstream. QDVC settles its payments with subcontractors regardless of payment delays from the clients. Furthermore, labour suppliers and subcontractors which have workers on site are paid in priority compared to other types of subcontractors.

b) Employee wages?

No. QDVC pays its employee wages on time no matter whether it has been paid on time by its clients. QDVC employees have not experienced any salary delay.

c) Other creditors? Please specify.

None.

9) What mechanisms does your company have in place to detect unpaid wages to workers on your projects? Does your company maintain reserves to ensure salary commitments can be met, and has the company ever intervened to pay workers' wages when the direct employer has defaulted or gone into liquidation? Please describe.

Wages are paid on a monthly basis directly to a personal bank account which is set up by QDVC for the workers upon their arrival in Qatar. They are always paid on time and in-full (including overtime). QDVC has never encountered issues of delayed payments to its workers.

Our subcontractors are requested to do the same, in compliance with the Wage Protection System (WPS). WPS detects late or un-paid wages. Additionally, QDVC requests its subcontractors to provide payslips to their employees and to demonstrate that the wages include sick leave and paid leave. We have also introduced a specific clause in our contract with subcontractors which require the subcontractor to demonstrate financial ability to cover workers' salaries for the duration of the contract.

Subcontracted workers can raise issues of unpaid or delayed wages at the Incident and Injury Free committee (IIF ®) and through the grievance mechanism (refer to question 20 for detailed description).

QDVC maintains sufficient reserves dedicated to the payment of wages of both its own and subcontracted workers. In instances of subcontractors defaulting on the payment of wages, QDVC sends out warning letters to remind subcontractors and manpower providers to pay their workers on time. Failure to do so on part of the subcontractor will result in demobilization of workers from site and non-renewal of their contract. In cases when the subcontractor goes into liquidation, QDVC attempts to absorb as many workers as possible, when it is feasible.

Freedom of movement

10) How does your company ensure that all workers on its project sites have free and secure access to their passports and identity documents, including workers employed by subcontractors and labour-supply companies?

The passports and identity documents of the workers are never retained. Each worker is provided with a personal safety deposit box at disposal in his room for safekeeping of his passport and personal belongings.

For residency permit processes only, QDVC will require the original passport of its employees. Workers are provided with a photocopy and a receipt form that states QDVC's commitment to return their passport. Upon completion of residence permit application or renewal procedures, the passport is returned to the employee immediately.

All QDVC employees have **Residence Permits**, local Qatari **identity cards** and a **valid work visa**. It is mandatory to have these identity documents to legally carry out work in Qatar. All workers receive a **health card** (Hamad Medical Card) that allows them to benefit from free medical care in the Qatari public hospitals.

Subcontracted workers and workers from labour supply companies are required to provide proof in the form of a signed acknowledgement that workers have access to their passports and identity cards. This is then cross-checked during CSR audits and random spot checks. Newly recruited workers who come to site are required to present their valid Residence Permits or work visas in order to be eligible for the safety induction.

- 11) How does your company ensure that all workers on its project sites have valid work permits and other documents required for employment, including workers employed by subcontractors and labour-supply companies? Please include information on who pays for work permits and what steps the company takes when employers on its projects fail to issue or renew workers' permits.

QDVC maintains a strict policy on employing workers with valid work permits and relevant documentation. Following a spot-check on all QDVC projects in 2017, a memo (dated 2nd January 2017) was issued by the CEO of QDVC to engage with providers that can provide valid residence permits to all its workers. The memo also mentions that spot-checks are to be carried out during the induction stage and at the entrance of our sites. If workers onboard have a temporary work visa or business visa, it is closely monitored and rectified in a proper manner. It is important to mention that exceptions to this rule are made when workers with a specific skill set are required to work on site for a short duration on site. In such cases, workers may be allowed to enter site on a temporary work visa/business visa.

A database of all QDVC workers' IDs and expiration date is maintained by the Public Relations Officer. QDVC renews work permits 15 days prior to expiration. The cost of renewal of work permits is borne by QDVC and the sponsor in case of workers employed by subcontractors and labour supply companies.

Systematic checks are carried out by the health & safety department to check the validity of the QIDs and health cards of all workers. In case of workers employed by subcontractors and labour supply companies fail to provide valid IDs and documentation, they are not allowed to work on site. Additionally, random check of IDs and medical cards of more than 1.200 workers from subcontractors and labour supply companies was carried out in 2018. Warning letters to correct the situation and a complete list of workers' valid IDs were sent to companies whose employees were found with expired IDs or had no IDs.

- 12) How does your company ensure all workers on its projects are free to change jobs and/or leave Qatar at will?

QDVC **systematically grants Non-objection Certificate (NOC)** for transfer of employment to all workers who request it with no conditions attached, provided that the request is approved by the

Ministry of Labour and is after one year of employment. The Ministry of Labour in Qatar mandates the completion of one year with the current employer before an employee can transfer to another employer. The topic was covered and mentioned during multiple Workers' Welfare Committee meetings of 29 April 2015, 10 October 2017 and again on 20 December 2017. Information on the NOC is also mentioned in the "**Workers' Rights and Induction Handbook**".

Subcontractors and labour supply companies are also requested to provide NOCs to their employees during CSR audits as they are part of the assessment criteria. It must be noted that granting NOCs is not mandated by the Qatari Labour Law and thus, not all companies provide it.

Living conditions

- 13) How does your company ensure safe and decent accommodation for all workers on its project sites, including workers employed by subcontractors and labour-supply companies? Please include information on what steps the company takes when employers on its projects fail to house workers in adequate living conditions.

For worker accommodations, QDVC constructed in 2014 a vast labour community which adheres to the Ministry of Labour regulations and has been designed in accordance with the requirements of the Qatar Foundation Standards, surpassing the Qatar Labour Law requirements. Built on 191,000 sqm, the Community can house 3,700 workers. It contains 10 blocks for workers, 3 blocks for junior staff and 1 block for senior staff. Four workers share a room of 27 sqm while two junior staff room share a 20sqm room. Senior staff are provided with individual rooms covering 20 sqm. Facilities include a canteen, a clinic, an indoor fitness center, a multimedia room, TV Halls, Internet Cafe, a cricket and football pitch, volley-ball, basketball and badminton courts, ping pong tables, billiards, carrom tables (a common Indian game) and a prayer room. It is also equipped with a commodities store and a barber shop. A professional hospitality company handles the catering, laundry and housekeeping on QDVC's behalf. A video of the QDVC community can be seen via the following link: <https://vimeo.com/127474991>.

One of QDVC's priorities is also to continuously improve the workers' safety and welfare of our subcontractors and manpower providers. We systematically inspect the labour accommodation facilities of our potential subcontractors and commit to partner only with either those who comply with Qatar Foundation Standards or those who commit to reach these standards. We conduct regular follow-up audits to ensure that they continuously improve, from the pre-qualification phase to the end of their contract.

If employers fail to comply with QDVC's housing standards, they are required to either modify their accommodations to meet our standards or house their workers in the QDVC labour community.

- 14) Please describe how your company makes provision for workers to have access to:

- a) safe and adequate nutrition

QDVC recognizes that safe and proper nutrition is key to ensuring workers' health. QDVC has agreements with catering service provider Newrest Gulf which has been certified ISO 9001 and ISO 22000. They prepare and deliver meals at the QDVC workers' community and to the various QDVC sites. On average, Newrest Gulf serves 40,300 meals per day to QDVC and subcontracted workers. Periodic audits of Newrest Gulf are carried out alongside regular food testing.

During summer time, workers are provided with servings of fruit and juice. Additionally, special menus are created and prepared for common festivals and public holidays.

b) Healthcare

Clinics and first aid stations with qualified medical staff have been placed on QDVC sites and in the QDVC workers' community.

Licensed ambulance and emergency vehicles are made available to workers who need immediate medical assistance.

Doctors and nurses are present on every site including the workers' community.

Regular check-ups are carried out for workers on various sites throughout the year. Workers such as operators and heavy vehicle drivers go through occupation-specific check-up. Figures in the table below provides the number of employees who benefited from trade-specific health examinations in 2017-18.

Driver - Light Duty	18
Boom Truck Operator	2
Concrete pump Operator	1
Driver - Heavy Duty	8
Excavator Operator	8
Gantry Operator	1
Grouting Operator	1
Heavy Driver	3

Psychological support and counseling services are provided to all QDVC workers. This is done in partnership with an external provider called Eutelmed. Eutelmed proposes to prevent and manage mental health issues linked to expats. They specialize in providing solutions through a secure video-consultation platform or by phone. Workers are offered 3 sessions per year provided at the expense of QDVC. Workers can approach the Welfare Officer, Doctor or CSR officer of the project to request for a session. The sessions take place in a private room on site or at the community. Contents from sessions remain confidential except for cases with tendencies of self-harm, management is notified in such instances. Psychological support is also provided by the company in case of a crisis (fatality, accident, etc.).

In-house counselors have been nominated on each QDVC project and the workers' communities. They have been trained to provide psychological first aid during a crisis and detect PTSD (post-traumatic stress disorder).

QDVC Peer Support Program – Buddy Program has trained 29 “Buddies” from Serge Moulene Workers' Community and RLS Oyster Village to take note of signs of psychological unrest among their peers and provide temporary relief. The “Buddies” can be approached on site or at the community. They support the in-house counselors in their mission to provide psychological support to workers.

c) banking and remittance services

Free transportation at frequent intervals is provided for workers to the nearest city to remit money to their home country. QDVC has attempted to contact multiples banks to set up an ATM kiosk within the community. However, this has not been possible due to the size and location of the QDVC workers' community.

d) transportation

Daily buses to and from the nearest city are available from the community. Airport shuttle services are also provided to QDVC workers, as well as transportation to the hospital and medical centers. Transportation is also organized within various sites in QDVC. All vehicles are equipped with air-conditioning and safety belts.

e) leisure activities

Workers can take advantage of the numerous facilities provided by the community. Facilities include an indoor fitness centre, a multimedia room, TV halls, internet cafe, a cricket and football pitch, volley-ball, basketball and badminton courts, ping pong tables, billiards, carrom tables (a common Indian game) and a prayer room. This has been mentioned in question 13.

In addition to the above-mentioned activities, QDVC has a gym coach and a full-time social worker based in the workers' community, who coordinate the numerous leisure and social activities organized throughout the year for the workers. The main ones are:

- **New Year Celebration at the QDVC workers' community:** An annual social gathering with special musical and dance performances for the workers.
- **National Sports Day:** Sporting events are organized throughout the community for workers to participate during the National Sports Day in Qatar. Activities range from races to weightlifting competitions.
- **Eid Celebration:** Special meals and entertainment are provided for all the workers during Eid.
- **ROTA Adult English Literacy Program:** A Qatar Foundation initiative, it relies on volunteers from the QDVC staff to teach English to workers who wish to improve and add to their skill set. The program runs for 16 weeks; training for volunteers and teaching materials are provided by the program. Since the introduction of the program, **more than 160 workers**, from QDVC and its subcontractors, have participated in the initiative.
- **Generation Amazing:** Generation Amazing is a programme developed by the Supreme Committee 2022 which operates on the philosophy of football for development including the Workers' Inclusive Training. The programme uses sport to specifically reach workers and address issues of inclusion, health and nutrition. The Workers' Inclusive Training has been implemented since October 2016 in QDVC. The programme spans over 10 weeks (held on Fridays) and is carried out at the QDVC Workers' Community. **114 QDVC workers** have completed its 6th term. As part of the programme, two QDVC employees were invited to attend the opening ceremony and match of the 2018 FIFA World Cup in June 2018 in Russia.

Health and safety

15) Please describe your company's health & safety policy and procedures, including what steps the company takes to ensure that they are applied to directly employed and subcontracted workers on your projects.

It is VINCI's and QDVC's greatest responsibility to provide the best working conditions allowing its employees and its subcontracted workers to return home safe and to maintain their health, physical and mental wellbeing. QDVC activities in Qatar are in line with the following laws, standards, and internal policies:

- Qatar Labour Law

- Qatar Construction Standards (QCS)
- OHSAS 18001 Occupational Health and Safety
- Qatar Foundation Standards or equivalent workers' welfare standards required by QDVC clients.
- QDVC Management Policy
- QDVC Company Manual

QDVC commits to the “**Zero Accident**” policy of Vinci: we reject the idea that workplace accidents are unavoidable. The main objective of the company's health and safety policy is to anticipate and prevent occupational hazards, including psychosocial risks. It also consists of respectable standards of health and safety, quality of life in the workplace, and in redeploying employees who have suffered an occupational accident or illness. Health & Safety is deployed on all our projects through the following initiatives (the list is not exhaustive but includes some of the key components of QDVC's policy):

Health & Safety policy: all managers commit to meet legal obligations and take all necessary measures to provide QDVC employees and third parties with healthy and safe working conditions. Health and safety clauses are a compulsory part of every contract, including those contracted out to external suppliers and sub-contractors. Thus, QDVC safety rules are applicable to all the employees and stakeholders working on the project. These rules can, and often do surpass the legal requirements.

Safety inductions: mandatory for all employees, including subcontractors and visitors on site.

Personal Protective Equipment (PPE): QDVC provides free PPE to all its workers and manpower suppliers. The subcontractors provide PPE to their own employees. If there is a need for task specific PPE, it is provided by the company.

Work Method Statements (WMS): no work starts on site without a Work Method Statement (WMS). It is a document which describes the procedure to be carried out to perform safely a specific activity, assess the health, safety and environmental risks associated and define the appropriate control measures to reduce them. The WMS is transferred to the work team through a “Pretask” and “Pre-start” meeting where the operational team can challenge the methodology on HSE aspects. This is applicable to subcontractors as well.

Green Helmet/Yellow Vest Training: each new worker on the project goes through a mandatory training over one month comprising of four modules: 1. Hazard Spotting, 2. Working at Height, 3. Personal Protective Equipment, 4. Fire prevention, first aid, welfare and waste management. Until he has completed the training, the worker wears a green helmet on site, which helps his co-workers and supervisors identify that he is new on the project and could be potentially at risk.

Continuous safety training, forums & toolbox talks: year-long safety training conducted on all sites.

HSE Reward and Recognition Program: projects also implement awards schemes which is linked to the safe achievement of production targets.

First aid stations and clinics with qualified medical staff on site are available for all employees on-site, including outsourced workers: medical surveillance includes a doctor-administered fitness assessment, monitoring blood pressure and blood sugar levels. Medical training courses are provided for our doctors and nurses. They cover Cardio-Pulmonary Resuscitation (CPR), basic life support and first aid.

Psychosocial risk prevention and crisis management : psychosocial risk prevention services include individual prevention sessions and collective training for employees and workers. Workers are entitled to three individual sessions per person per year covered by QDVC. Consultations are available to workers in more than 25 languages and remain confidential with a few exemptions in which case QDVC will be informed and professional confidentiality will be waived.

In addition to this, trainings have been provided to QDVC staff and workers to recognize the early signs of psychological risks and how to address them in a proper manner.

In the event of a serious incident (accident, death, attempted suicide, etc), QDVC has round-the-clock access to an emergency line via Eutelmed's on-call crisis manager who is responsible to provide appropriate assistance within 2 hours (cf. question 14.b on healthcare). Furthermore, collective and individual debriefing sessions are conducted by video or phone. An anonymous and confidential debriefing report is issued by Eutelmed after each debriefing session. In extreme cases, Eutelmed deploys its psychologists on site to provide individual and group consultations, and to guide the management on the best course of action.

16) What is your company's policy and procedures on overtime? Please include in your answer:

- What the maximum/limit is on the amount of overtime

The policy is to work 8 hours a day with 2 hours of overtime, so a total of maximum 10 hours per day, 6 days per week. There is a one-hour unpaid lunch break. As per the Qatar Labour Law, employees never work more than 5 consecutive hours.

In certain work areas, the sites operate 24h, with two shifts of 12h each. In this case, there is a one-hour unpaid lunch break and two paid 30-minute breaks every shift.

- Whether overtime work is voluntary

Overtime is voluntary. However, all the workers choose to work 10h a day, except during Ramadan when the work schedule is shortened.

- What the premium is for overtime work

Overtime: all additional hours worked between 48h and 60h per week are paid overtime (at a rate of 125%). When a worker works on a Friday, he is paid overtime (at a rate of 150%). Workers during Ramadan are paid at overtime rate above 6h of work.

- How the company prevents all workers on its projects from exceeding overtime limits during peaks in construction activity

The application of these rules is assured by the team of timekeepers who collect the timesheets filled in by the foremen who are responsible for checking the attendance of all the workers on site, including labour suppliers. The timesheets are computed by the timekeepers and checked daily by the Section Engineer and the Section Manager of the area of work concerned. Timesheets are consolidated by the Chief Timekeeper and checked and approved monthly by the Works Manager. In case the hours worked exceed the limits specified, an alert is raised, and the situation corrected.

17) What steps does the company take to protect all workers on its projects from high temperatures, humidity and sunlight throughout the year? Please include information on how you monitor heat risk and how you communicate protective measures to all workers.

A heat stress prevention program is deployed on a yearly basis. It consists of a management kick-off meeting, special toolbox talks, extra-training and actions to face the heat and associated health & safety risks for the workers. The "Heat Stress Campaign" is delivered through toolbox talks throughout the summer.

Heat index policy: sites are equipped with temperature and humidity captors. Safety officers also carry a “Kestrel” monitor which measures the heat index. The heat index monitors humidity and temperature levels. Information from the Kestrel is used to update the flag system in place on site to indicate the work and hydration schedule. When the heat index rises above a specific level, works on site come to a halt.

Heat index alert: The project team is informed in real time via text message of changes to the heat index level.

Summer working hours: the Qatari Labour Law bans any outdoor work under direct sunlight between 11.30am and 3pm between 15th June and 31st August because of the extreme heat and humidity in the summer season. On most QDVC projects, the precautionary measure is extended to stopping the works from 11am until 3pm between 30th May and 15th September.

Summer buddy system: Workers are not allowed to work alone during the summer, whereby, each party monitors their partner looking for signs and symptoms of heat stress.

Skilled nurses: Our nurses are adept in dealing with heat stress-related cases. Since 2014, we have conducted a survey of all the persons affected by the heat to help build a database of information to prevent future personnel from being affected.

Rest areas: shaded and ventilated rest areas are provided on site, all within a few-minute walk of each work area. Wherever is possible, large air-conditioned rest area facilities are built on site.

Ice-plant: an ice-plant was set up in 2013 to produce ice to be transported to various site areas to cool drinking water for the workers. It is operational from June until September and can produce around 6 tons of ice per day.

Water and nutrition: Workers are provided with unlimited drinking water. During summer season, fresh fruit is distributed daily to workers on site.

- 18) Does your company maintain public data on fatalities and injuries to workers on its projects? If yes, please provide a link or attachment with the data. If not, please provide information for 2016 and 2017 on the total number and the causes of:
- Work-place fatalities in your direct and subcontracted workforce
 - Permanent disabilities in your direct and subcontracted workforce
 - Lost-time injuries in your direct and subcontracted workforce ⁴

		QDVC Health & Safety Reporting	
Year	Statistics	2016	2017
	Total LTI	26	18
	Days Lost	403	400
	Frequency Rate*	0.76	0.37

⁴ Lost time-injuries calculated on the basis of injuries resulting in incapacity for work of at least three consecutive days (excluding the day of the accident)

Severity Rate*	0.013	0.007
Fatality	1	1

*Frequency rate is calculated as: $\# = (\text{number of lost-time accidents} \times 1,000,000) / \text{number of hours worked}$.

*Severity rate is calculated as: $\# = (\text{number of days of time off (days lost) due to work accidents} \times 1,000) / \text{number of hours worked}$.

QDVC projects suffered one fatality in 2016 and one in 2017. On 28 February 2016, an accident killed a Filipino miner on the RLS-JV Project, employed by our JV-partner Al Darwish Engineering. During the installation process of lattice girder in order to facilitate the correct spraying of shotcrete, a limestone slab fell from the cross-passage crown and fell on his head.

On 16 October 2017, a road accident a Bangladeshi helper working for Strom, a company specialized in electrical works and subsidiary of Bin Omran Trading and Contracting, the JV partner on the NOH2 project.

In both cases, the client, emergency services and police were called immediately. The police conducted an independent investigation and Vinci Construction Grands Projets sent a team of health and safety experts specialized in root-cause analysis of accidents to help the QDVC crisis unit analyze the event, draw conclusions and initiate both the corrective and preventive actions to be followed.

There was no permanent disability in our direct or indirect workforce in 2016 and 2017.

Due to the size of our projects (more than 50 million hours worked each year), we cannot list here the causes of the 44 LTIs which occurred in 2016 and 2017 on QDVC projects. A full log detailing the description, cause, location, date, time, name and identity of the injured, number of days lost, and mitigation action is maintained by the HSE Department and available upon request.

In 2017, QDVC's lost-time injuries decreased by more than 31% compared to 2016. The CEO of QDVC, Philippe Tavernier, publicly declared: « We continue to put substantial focus on safety not only because it is the right thing to do for our employees, but also because it ultimately leads to a stronger company and markedly improves financial performance» (QDVC Annual Report 2017, <http://www.qdvc.com/images/pdf/report-2017-en.pdf>)

QDVC's commitment to health and safety was recognized by the Royal Society for the Prevention of Accidents (RoSPA) Gold Award in three consecutive years (2016, 2017 and 2018). QDVC also received the British Safety Council Award in 2018.

QDVC has an Integrated Management System which is audited every year both by Vinci Construction Grands Projets and by an independent auditor (AFNOR). QDVC is ISO 9001, ISO 14001, OHSAS 18001 and ILO-OSH 2001 certified.

Representation and remedy

19) 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 State of Qatar has not ratified the ILO (International Labour Organisation) Convention on Freedom of Association and the Convention on the Right to Organize and Collective Bargaining. However, the

Qatar Labour Law (art. 116-127) states there can be consultative “joint committees” between employers and employees. QDVC is promoting workers’ representation through the facilitation of Workers’ Welfare Committee meetings. A formal procedure, updated in the Company Manual since 2016, details its purpose and rules.

QDVC Workers’ welfare committee falls within the:

- Qatar Labour Law (Law No. 14 of 2004): articles 124 to 127
- Qatar Construction Specification 2010 (section 11, part 1)
- OHSAS 18001 (article 4.4.3.2)
- Qatar Foundation standards (article 9.3.3)
- Supreme Committee 2022 Workers’ Welfare Standards (article 16)

The Committee, in respect with the Qatar Labour Law, is a consultative organ. Within this frame, QDVC encourages the representatives to be involved in the promotion of collective benefits. Since 2011, committee members were volunteers appointed by the management; they are now elected by their peers.

Following recommendations by BWI and other external stakeholders, the Committee held its **first ever elections** to elect its representatives from all QDVC sites in **November 2016**. Following an awareness campaign attended by more than 80% of the total worker population at the time, 27 representatives were elected out of a pool of 75 candidates and now sit in the QDVC Workers’ welfare committee which meets bi-monthly. We are delighted to have had the votes of 2,758 workers, amounting to a 72% participation rate. The CSR Department, whose work was fully transparent and monitored by the candidates, organized the elections and guaranteed high standards of probity around the vote-counting process. An initial survey was conducted among the existing members of the worker’s welfare committee to consult them about how the elections should be organized.

With the objective to expand the development of elected workers’ welfare committees across the construction industry, QDVC was contacted by the **ILO Program** in Qatar to share its return of experience and methodology around the election process. This was done through a meeting which took place between QDVC and the ILO on 19 July 2018 in Doha.

Additionally, on 21st November 2017, QDVC and VINCI signed with the Building and Wood Workers’ International (BWI) a Framework Agreement on Worker’s Fundamental Rights (see question 3). Following the signature, BWI and QDVC worked together on a **training and capacity-building program for the workers’ representatives**. The program is the first of its kind in Qatar and moving forward and on schedule: 3 sessions have taken place in 2018 and the last one is due to be completed in September 2018. It is composed of 4 modules of one-day each, designed and delivered by BWI delegates to the current workers representatives and their substitutes, during working hours and with the support and contribution of QDVC.

The modules are articulated around the main missions of representatives and the concrete tools they need to fulfill their role: leadership skills, listening and communication skills, how to run an effective meeting and practical knowledge about workers’ rights under the Qatar Labour Law and the company policy.

20) In accordance with the UN Guiding Principle on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers on your projects to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? Please provide a description of the company’s grievance mechanism.

For collective grievances, QDVC workers are encouraged to raise them through the **QDVC Workers’ Welfare Committee**, directly or through their project workers’ representatives. It is conducted every

two months. Here, workers can raise concerns on topics such as the working and living conditions, wages, HR procedures, leave, health and safety. The committee provides a platform of dialogue between workers' representatives and the management made of the HR & CSR department, safety managers and QDVC executives.

For individual issues, a **grievance mechanism** was set up in March 2016 and its procedure officially formalized in the company manual. If an employee has an issue, he is encouraged to share it as soon as possible with his line manager. In case the grievance is not resolved, he can contact any of the grievance receivers appointed in his workplace or at the workers' community. A Welfare Officer who reports directly to the HR and CSR Director works full-time in the Workers' Community to collect and resolve the workers' grievances. He speaks English, Hindi, Tamil and Malayalam. Grievances are dealt with in a confidential manner.

A **whistle-blower system** has also been implemented in QDVC since April 2016. The purpose of the system is to allow any worker to easily raise an alert in case he becomes aware of an issue related to unfair treatment, harassment, unethical or illegal behavior within the organization during which the issue is not or cannot be addressed through the channels mentioned above. The alert receiver (typically the CSR Officer on the project) raises the issue to the appropriate level of management with maximum confidentiality and seeks the support of the QDVC Head Office if needed.

Safety behavioral programs such as the **Incident and Injury Free (IIF ®)** and **Serenity Program** have been implemented to create a culture that emphasizes the welfare and safety of workers including subcontracted workers at the forefront of the organization through workshops, coaching and interviews. Through the program, **HSE Committees** are set up. They are generally composed of senior management and subcontractors' representatives. These committees do not have worker representation however their main role is to respond to the grievances brought up by the workers during the inductions, workshops and visits made by the program coordinators on site. Thereby, protecting the identity of workers who raise grievances.

12 Complaint boxes have been placed on site to allow workers including subcontracted workers to share their worries. Grievance forms are available in English, Hindi and Bengali. The boxes are locked and only the Grievance Receiver has access to it. Complaints are read every 7-10 days.

Workers are also reminded time and again on site and at the community to bring forward their concerns without fear of retribution. This is done through **toolbox talks** which have been organized regularly on the topic of grievances on all the sites and projects to make sure the workers are aware about the grievance mechanism and know who to contact in case they need to raise a concern. The talks are delivered in Hindi and English. Additionally, posters translated into Hindi and Bengali are displayed on the safety notice boards on site. The posters include contact information of the Corporate Welfare Officer and the Grievance Receiver for each project.

21) How many grievances were raised in 2017 by directly employed and/or subcontracted workers on your projects? Please provide a summary of the grievances and the remedial actions that were taken by the company and its subcontractors.

In 2017, a total of **32 grievances** were received by grievance receivers on various QDVC projects and QDVC workers' community. Majority of the grievances were related to HR matters like emergency leave approval, bonus and salary adjustments. A few were related to travel issues (date adjustment, extra-travel charges, need to travel for medical reason) or poor work relationship with the direct management. All the grievances are handled as per the QDVC grievance mechanism and dealt with in a confidential manner. In 2017, it took 16 days on average to solve a grievance. In 2018, it has taken an average of 10 days so far. A **Grievance Dashboard** is maintained up to date by the corporate

welfare officer and a summary of the grievances shared regularly with the top management of the company.

An example of a grievance raised and remedial action taken was in the case of a QDVC worker who wanted to go on vacation before he was eligible. His leave application was not approved by the project. Following the intervention of a Grievance Receiver his leave application was approved. Upon further investigation of by the Grievance Receiver, it was discovered that he needed to travel home due to familial problems which were not disclosed previously to his supervisors.

Other information

22) Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in Qatar, including any challenges it faces in doing so?

It is worth mentioning that **QDVC has invested significant resources** to prevent risks of forced labour and to improve the working and living conditions of migrant workers. QDVC has invested close to 200 million Qatari Riyals to build its own Workers' Community which adheres to the regulations set by the Ministry of Labour and has been designed according to the Qatar Foundation Standards, which are exceeding the country's labour law. The general services department in charge of operating and maintaining the community facilities has 47 employees. The Welfare Department in charge of ensuring the welfare of the residents comprises of 2 Welfare Managers and 4 Welfare Officers.

QDVC has set up a dedicated CSR department since 2013 to develop and implement workers' welfare policies and processes across the company's operations. In 2018, the CSR Department consisted of 5 full-time employees and 2 CSR referents working part-time on workers' rights issues. In addition to this, a large number of health & safety inspectors are regularly assigned to conduct the inspections of the workers' accommodation of our subcontractors and labour suppliers, or to carry out labour rights spotchecks on site. In brief, the issue of migrant workers' rights has consistently received attention and support from the top management of QDVC and VINCI.

Regarding the **challenges**, we are appreciative of the numerous measures taken by the relevant ministries to improve workers' welfare within Qatar. However, QDVC could benefit from more support regarding enforcement of the Qatari Labour Laws. Some of the problems that may be currently faced by migrant workers could be solved with the implementation of the following elements : a national minimum wage, a defined ratio between the basic and total salary, the regularisation of the status of labour suppliers and attribution of work and business visas.

Secondly, QDVC operates in a highly competitive market. Unfortunately, some competitors do not take workers' welfare issues into consideration when conducting their own operations, thus placing QDVC in a challenging position. The tendering process should account for the true cost of responsible labour practices, for instance. This would help compliant contractors to remain competitive and create positive incentives for the rest of the industry.

In a pro-active approach to create a level-playing field on the issue of workers' welfare, VINCI launched **Building Responsibly (BR)** in February 2017 with 5 other industry-leading international engineering & construction companies. It is a global, business-led coalition committed to raising the bar in promoting the rights and welfare of workers across the industry. The initiative hinges on the belief that pre-competitive collaboration is essential for companies to improve standards, policies, and practices to accelerate impact across the industry. The total number of people employed by BR members reached 402,000. VINCI is one of the founding members of this initiative with Bechtel, Fluor, Jacobs (formerly CH2M), Multiplex and Wood (formerly Amec Foster Wheeler).
<https://www.building-responsibly.org>.

