

Business and Human Rights Resource Centre
Questions for construction companies regarding working conditions in Qatar

QDVC
Subsidiary of VINCI in Qatar

Note: Question 11 provides the company with the opportunity to describe challenges confronted in the areas covered by the preceding questions.

Where possible, please attach or provide a hyperlink to the policies and standards you refer to in your answers.

- 1. Social responsibility or human rights policy:** Does your company have a publicly-available commitment to human rights or to social responsibility? If so please share the link.

VINCI has been a signatory to the **UN Global Compact** since 2003. It is committed to supporting and promoting respect for human rights within its sphere of influence, and to ensuring that Group companies are not complicit in human rights abuses. The Group acts on this commitment by including clauses relating to human rights in its framework agreements with suppliers. VINCI established its own **Human Rights Committee** in 2013, which notably includes the human resources directors of companies located in potentially sensitive regions. In 2014, the new version of Advance, VINCI's sustainable development self-assessment tool, was released, including a section on fundamental social rights. More information on Vinci's commitment to fundamental social rights can be found online: https://www.vinci.com/vinci.nsf/en/sustainable-development/pages/fundamental_social_rights.htm.

In Qatar, QDVC issued its standalone **Workers' Welfare and Human Rights Policy** (available in the QDVC Company Manual since July 2016) which explicitly covers the areas where human rights risks are prevalent in Qatar and the fundamental rights of workers employed by QDVC. It also includes a detailed statement on our duty of due diligence with regards to human rights risks in our supply chain.

Following the UN Guidelines on Business and Human Rights, a **Human Rights Impact Assessment** of QDVC was conducted in September 2015 by an independent third-party, BSR (Business for Social Responsibility). The executive summary of the report is available upon request.

- 2. Scope of operations:** Please describe the nature and scope of your company's operations in Qatar, including reference to current projects and business partners (herein 'business partners' inclusive of sub-contractors, suppliers, and joint ventures).

VINCI operates in Qatar through 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 major projects include the first Qatari Lusail Light Railway Transportation system (LRT), the Doha Metro Red Line South (RLS) and the New Orbital Highway (NOH). The first phase of the LRT Project was 100% owned by QDVC between 2008 and 2014; the LRT final phase (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 2015 and 2016, QDVC employed around 180 sub-contractors and 370 suppliers.

3. Sub-contracting: How many workers do you hire directly and how many are hired by sub-contractors?

The number of our workers can greatly vary following the different phases of delivery of our projects. As of September 2016, total workers on site are 8,449. Out of that figure, 4,036 are QDVC workers (48%), 4,413 (52%) are sub-contractors. Our policy is to direct-hire as far as possible, which we do in the main civil works and plant activities. Our activities increasingly involve architectural & MEP (Mechanical, electrical and plumbing) works, for which we employ specialized contractors.

QDVC Manpower as of end Sept. 2016		
QDVC employees	4,036	48%
Subcontractors	4,413	52%
Total	8,449	100%

4. Health and safety:

In direct operations and in contracts with business partners:

a) What is your company’s approach to ensuring workers’ health & safety in Qatar?

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:

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.

First aid stations and clinics with qualified medical staff on site: 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.

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

Green Helmet/Yellow Vest Training: each new worker on the project goes through a compulsory training over one month comprising 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.

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.

Continuous safety training, forums & toolbox talks: yearlong safety training conducted on all sites.

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

b) Have you established occupational health and safety committees, and if so, do these have worker participation?

Yes. The **QDVC Workers' Welfare Committee** which takes place bi-monthly with workers' representatives systematically covers health and safety issues. A representative of the HSE management team participates in the meeting to discuss about potential safety problems and present solutions to address the HSE issues.

The company has also implemented **safety behavioral programs** on its major projects (Incident and Injury Free (IIF[®]) and Serenity Program). The objective is to create a culture that puts the welfare and the safety of the employees at the forefront of the organisation through workshops, coaching and interviews. The subcontractors also go through orientation and training. 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.

c) How many accidents and fatalities have taken place on site in the last two years?

The following figures incorporate both QDVC and sub-contractor rates:

· In 2014, the lost-time accident frequency rate* was 0.90 (with a maximum objective of 1.0). The lost-time severity rate* of that year was recorded as 0.011.

· In 2015, the lost-time accident frequency rate was 0.77. The lost-time severity rate of that year was recorded as 0.015.

· In 2016 (on a rolling twelve-month basis), the lost-time accident frequency rate was 0.76. The lost-time severity rate of that year was recorded as 0.013.

**Lost-time accident frequency is calculated as: # = (number of lost-time accidents x 1,000,000) / number of hours worked).*

**Lost-time severity rate is calculated as: # = (number of days of time off (days lost) due to work accidents x 1,000) / number of hours worked).*

Two work-related fatalities hit QDVC in the last two years: one subcontractor's worker on 5 January 2015, and a worker of our partner on 28 February 2016, died of a workplace accident on the RLS-JV project. When there is a fatality, we immediately inform our client and the public authorities. A police inquiry is conducted. Internally, a crisis unit is formed within 24 hours. It is composed of the QDVC Chief Executive Officer, the corporate and project Health & Safety managers, the Project

Manager, Construction manager and site engineers. A full investigation is conducted to establish the root cause analysis of the accident and a corrective action plan, which comprises both short-term and long-term actions.

- d) What measures do you have in place to protect workers from high temperatures during the summer months? How do you communicate these measures to the workers?

A **heat stress prevention program** is deployed on a yearly basis. It consists of a management kick-off meeting, special toolbox talks, training and actions to face the heat and associated Health & Safety risks for the workers.

Summer working hours: the Qatar 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 precaution measure is extended to stopping the works from 11am until 3pm between 30th May and 15th September.

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 certain site areas to cool the drinking water for the workers (from 40°C to around 25°C). It is operational from June until September and can produce around 6 tons of ice per day.

Nutrition: in the summer season, fresh fruit is distributed daily to workers on site.

5. **Conditions of employment:** Please describe your company's policies and practice on each of the items listed below.

Where applicable, please include information on how you monitor and enforce these policies in direct operations and in contracts with business partners.

- a) Contracts - ensuring they are in a language the worker understands and are not modified upon the worker's arrival in Qatar

QDVC uses local agencies in each country of hire. The terms of contract and employment to future workers are expressed both orally and in writing in their mother tongue. 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. 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) Full and timely payment of wages, including issuing of bank cards for workers

Wages are paid on a monthly basis 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 if exercised). Each worker has a debit card linked to his personnel bank account.

- c) Issuing ID and health cards for workers

All QDVC employees have **Residence permits**, local Qatari **identity cards** and a **valid work visa**. All workers receive a **health card** (Hamad Medical Card) that allows them to benefit from free medical care in the Qatari public hospitals.

In addition to the compulsory **workmen compensation insurance**, which covers the employees in case of a fatality or accident at work, QDVC has subscribed to a **Life Insurance and Personal Accident Insurance Policy** to help employees and their family in case of a problem like an accident, disability or death. This policy has been effective since February 2016. It provides QDVC employees

with: a) a larger compensation to help the employee/the employee's family, b) an extension of the guarantee to cover the employee not just in the workplace but also outside work and outside during working hours. The policy was officially communicated and explained to the workers during the Workers' Welfare Committee meeting of 24 February 2016.

d) Ensuring adequate worker accommodation

For worker accommodations, QDVC has built 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**, which surpass 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 have individual rooms covering 20 sqm. Facilities include a canteen, a clinic, 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. It is also equipped with a commodities store and a barber shop. A professional hospitality company is handling the catering, laundry and housekeeping on QDVC's behalf.

One of the company'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.

e) Passport retention - ensuring workers can store passports in a safe place and have access

For residency permit processes 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**. Each worker has a **personal safety deposit box** at disposal in his room for the safekeeping of their passports and personal belongings.

f) Allowing workers to transfer employers within the country

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 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 during the Workers' welfare committee meeting of 29 April 2015.

g) Issuing of exit permits for workers who wish to leave the country

QDVC issues **exit visas** to all workers who wish to exit the country, whether for leave or upon resignation or termination. QDVC takes care of all travel-related expenses at the end of service, **regardless of the reason of departure**.

Regarding the questions a, b, c, d, e, f, g with regards to our subcontractors/business partners: On top of the labour accommodation inspections, **labour rights audits of our subcontractors** have been conducted since September 2015 by the CSR department 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. QDVC reserves the right to conduct spot-checks of the subcontractor’s HR policies and labour practices:

- Step 1: Interview of subcontracted workers on site (interviewees remain anonymous) on all the key points of the Qatar Labour Law and grievance mechanisms.
- Step 2: Examination of relevant documents (recruitment policy, employment contracts, ID, timesheets, proof of bank transfers, payroll and medical cards) at the subcontractor’s main office.
- Step 3: Issuance of an improvement plan based on mutual agreement between QDVC and the subcontractor’s management.
- Step 4: QDVC provides necessary support along the process and follow-up audits are conducted for continuous improvement.

6. Recruitment agencies:

a) What process does your company employ to recruit migrant workers?

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 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 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 stronger due diligence measures regarding the recruitment process:

- A **detailed inquiry** was conducted to identify the various steps during which a worker can be charged by intermediaries before meeting the QDVC recruitment team.
- **Warning letters** were sent to the various agencies we are working with.
- 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 **advertisement** in local newspapers in the native language is validated beforehand by QDVC, and **mentions a “Free Recruitment” policy**.
- The trade tests, interviews, selection process, signature of the offer letter and the orientation session are all conducted and explained in the **native language**.
- A **Workers’ Rights and Induction Booklet** (created by QDVC in July 2015 and available in English, Hindi and Bengali) is distributed to future employees to explain the recruitment and mobilisation process, their fundamental rights and information on the working and living conditions at QDVC.

b) Which recruitment agencies does your company regularly work with to hire workers? *Please list names and contact details of the recruitment agencies.*

N.	Agency	Owner	Country	Contact No	Email ID
1	BIPS	Raju Monga	India	+91 9886474717	ceo@bipsindia.in
2	JASPER	N. R. Prasad	India	+91 9820023434	prasad@jasperinternational.com
3	AL ISLAM	Zainal Zafar	Bangladesh	+88 01711592264	zainalzafar@yahoo.com
4	FUTURE	Sushma Khatri	Nepal	+977 9801021763	sushma@futuregroup.com.np
5	LBS	Loreto Soriano	Philippines	+63 9287923706	lot.soriano@e-recruitment.com.ph

- c) Does your company take steps to ensure that the recruiting agencies it deals with do not charge recruiting or placement fees? If workers have been charged fees, does the company compensate them for this expense on arrival in their position?
- The QDVC team uses all the opportunities during the various recruitment steps to make **candidates aware** 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 recruitment phases to communicate directly with the QDVC recruitment officer in case the candidates have any question.
 - A **systematic survey** is conducted upon arrival to verify that no fees have been charged. To double-check the results of the interviews, a survey is conducted again with the same employees after 3 months, and again after 6 months of employment.
 - 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 the fees of 76 of our workers who had been victims of the recruitment process in their country of origin before arriving in Qatar.
- d) Does your company require business partners to comply with the above recruitment procedures?

As explained in question 5.g), we conduct labour rights audits of our subcontractors which include questions on recruitment practices. We specifically engage with our manpower providers to improve their recruitment practices. QDVC shares with them the list of agencies we are working with, explain the process to be followed, mandate them to engage with their own recruitment agencies and to carry out orientation for the workers in the country of origin.

7. Grievance/remedy:

- a) Does your company have a grievance mechanism that is accessible to workers employed by you or working indirectly for you via business partners, in their own language?

For collective grievances, the workers are encouraged to raise them to 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 is a platform of dialogue between workers representatives (around 25 workers from various projects, trades and nationalities) 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 the procedure officially formalised in the Company manual. If an employee has an issue, he is invited to share it as soon as possible with his line management. In case the grievance is not resolved, he can contact any of the grievance receivers appointed on his workplace or at the workers' community. A **Welfare Officer** who reports directly to the CSR Administrator is residing 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.

- b) How do you ensure that workers are aware of its existence?

Information pertaining to the Workers' Welfare Committee is provided in the **Workers' Rights and Induction Booklet** that is distributed to employees during recruitment and during the **orientation presentation** conducted upon the workers' arrival.

On site, workers are shown an **internal movie** explaining the existence and functioning of the Committee. The movie showcases current committee members using real life examples and scenarios to demonstrate how the committee functions. At present, the movie has been screened to over 900 workers on site.

The **minutes of meeting** from the Workers' Welfare Committee meetings are communicated in English and Hindi via email and displayed on the HSE notice boards on site as well as the CSR notice board in the workers' community.

Further to this, **toolbox talks** have been organized regularly throughout the year on all the sites and projects since 2015 to make sure the workers are aware about the Workers' Welfare Committee and grievance mechanism.

- c) How do you ensure that workers do not face retaliation from supervisors or others for raising grievances?

A formal procedure details the purpose and functioning of the Workers' Welfare Committee. The Committee acts as an unbiased body, safeguarding the interest of the workers. This document has been sent to the respective management teams on various QDVC projects. Simultaneously, workers are reminded time and again on site and at the community to highlight their concerns without fear of retribution. This is done through initiatives mentioned above like toolbox talks, safety behavioral programs and "Film On Site".

- d) What processes do you have in place to address and remedy grievances?

As mentioned above, QDVC has in place two venues to address and remedy grievances, i.e, Workers' Welfare Committee (collective grievances) and the Grievance Mechanism (individual grievances).

When grievances are raised through the Committee Meetings, they are shared with the management for review and action. **Minutes of the meeting** keep record of the issues brought up by the workers, what solution has been found or if the issue is still pending.

When grievances are raised individually, they are recorded in a **grievance dashboard**. This tool details the type of concerns the worker has and actions taken. Grievances are recorded by designated grievance receivers. Grievance receivers (see 4a) act as a link between the management and the workers. They share the grievance with relevant personnel and choose the most suitable means to provide an appropriate answer to the employee's grievance. If the employee is satisfied with the response provided, the dashboard is updated and the issue is marked as closed. If not, then it is escalated to the next-in-line and accordingly updated in the dashboard. Only the grievance receivers including selected members from HR and CSR departments have access to the dashboard, thus, ensuring confidentiality.

8. Freedom of association:

- a) Does your company have organizational-level policies and procedures in place on freedom of association for workers?

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. As explained in question 4.c), QDVC is promoting workers' representation through the facilitation of Workers' Welfare Committee meetings. A formal procedure details its purpose and rules.

b) How does your company implement such policies in a context where local law restricts the ability of migrant workers to form or join trade unions, such as in Qatar?

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. The Committee will hold its first ever elections to elect its new representatives from all QDVC sites in November 2016.

9. Public engagement:

a) Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in Qatar?

QDVC management is responsible for warranting compliance with policies and procedures related to worker welfare and human rights. Subsequently, several departments (HR, CSR, HSE) support the management's activities by closely monitoring current procedures and situations, and upholding that appropriate measures are undertaken. Furthermore, other departments such as the legal department or those specifically working with sub-contractors also participate in ensuring compliance. It is a transversal issue.

b) Who should be contacted if workers or civil society groups have questions or concerns about your company's Qatar operations? Please provide contact information.

Name	Position	Email Address
Xavier Planchon	Human Resources Director, QDVC	xavier.planchon@qdvc.com
Henriette McCool	Corporate Social Responsibility, QDVC	henriette.mccool@qdvc.com
Ferial Bouchaib	Head of Communications, QDVC	ferial.bouchaib@qdvc.com
Sarah Tesei	Director of Social Innovation, Vinci	sarah.tesei@vinci.com
Jean-François Gouedard	Group Ethics Advisor, Vinci	

10. Engagement with Qatari government:

a) How does the company work with the Qatari government to improve enforcement of the labour law in areas such as passport and fee retention?

QDVC has a policy of not retaining any passports and fees; furthermore, there is utter freedom of movement for all of its employees.

Since 2007, VINCI and QDVC representatives have held high level meetings with Qatari Ministry of Labour representatives. Discussions are run with French representatives such as the French Ambassador on Qatar's current labour climate. In addition, VINCI organized two visits to Qatar with the participation of trade union representatives, consisting of officials from BWI, VINCI Board

members' employees and the Secretary General of VINCI'S European Works Council. During these meetings and visits, all topics related to employment practices globally have been raised.

b) Has your company engaged with the Qatari government about elements of the "kafala" sponsorship system that restrict workers' ability to change jobs or leave the country?

QDVC distributes "Non-Objection Certificates" (NOC) when employees request to leave the company to change employers, as explained in question 5(f).

QDVC has raised issues linked to employment practices with the Qatari government and on the occasion of Ministry of Labour inspections or during events attended by members of the Qatari government such as the annual CSR Qatar Summit, the "Leaders in Construction Forum" or the UN Forum on Business and Human Rights which was organised in Doha in April 2016.

- Furthermore, QDVC has been an active member of the Worker Welfare National Stakeholder Committee under the auspices of the Qatar Foundation. This group has been lobbying to improve working and living conditions in Qatar and promote the revision of the Qatar Labour Law.
- Since 2014, QDVC has partnered with Qatar Foundation, a semi-governmental organization on worker welfare national initiatives such as the "Social Innovation Bootcamp" and "Reach Out To Asia".

11. Challenges: Please describe any challenges your company is encountering in the areas described above.

A challenge for QDVC is the lack of control and level of enforcement of the Qatari labour laws, which could solve many existing problems that workers face.

Additionally, QDVC operates in a highly competitive market. Unfortunately, some competitors do not take these 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. This would help compliant contractors to remain competitive and create positive incentives for the rest of the industry.

On the issue of recruitment, the porous control from sending countries' governments upon the chain of recruitment within their own country is also a challenge for companies who want to implement an ethical process of recruitment. Being able to count on reliable and certified ethical recruitment agencies would release us from carrying the controls and checks upstream. Alternatively, clients could carve the recruitment out of the tender and assume the cost of recruitment to create a level-playing field between contractors.

Further information and guidance:

[UN Guiding Principles on Business and Human Rights](#)
[OECD Guidelines for Multinational Enterprises](#)