



A WALL OF SILENCE:

THE CONSTRUCTION SECTOR'S RESPONSE
TO MIGRANT RIGHTS IN QATAR AND THE UAE



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EXECUTIVE SUMMARY

An estimated 7% of the world's workforce is employed in the construction sector, and the industry is expected to account for 15% of global economic output by 2030. Qatar and the UAE are witnessing particularly rapid infrastructure development, boosted by the 2022 World Cup and the 2020 Dubai World Expo respectively.

Global inequality is perhaps at its starkest in the construction of gleaming skyscrapers and massive stadiums by migrant workers in the pursuit of decent livelihoods. Abuses of the largely migrant workforces in both Qatar and the UAE have been well-documented, but the situation for workers has been slow to improve and planned reforms widely criticized for being insufficient.

The abuses that migrant workers are subject to, including high recruitment fees, non-payment of wages, and restricted mobility, traps them in exploitative situations. Earlier this year the media reported an Indian worker's suicide on a building site in Qatar, raising concerns over the desperate situations migrant construction workers face if subject to unscrupulous employment practices.¹

Despite the spotlight on these issues, our outreach to 100 construction companies has found a shocking lack of transparency on the steps they are taking to address them. Only 22 responded to our survey on the subject (17 construction contractors, 4 project management/engineering consultants, and 1 developer). A review of these companies' websites reinforces the magnitude of omission when it comes to migrant workers' rights in the construction sector. Thirty-nine percent have publically available human rights commitments, and only 17% refer to any international standards. Just 3% have an explicit commitment to the rights of migrant workers.

The 78 non-responding companies cannot rely on a wall of silence to escape scrutiny. The attention to the human-rights performance of the sector

spurred by the Qatar World Cup has resulted in a concerted focus on the industry and its business partners from international institutions, governments, media and civil society. These actors will continue to shine a spotlight where the industry refuses to do so.

The responses we did receive reveal the wide gulf of understanding and commitment between pioneering companies and a long tail of laggards. Several companies are taking meaningful steps to demonstrate the actions they are taking to improve safeguards for their migrant workforce, including **Vinci (QDVC)**,² **Multiplex**, **Salini Impregilo**, **Laing O'Rourke**, **Interserve** and **Carillion**.

Transparency on human rights issues has been an important driver of progress in other sectors. It generates examples of best practice that can be shared publicly with others and replicated, and enables accountability such that civil society, investors and others can hold companies to their stated actions, or call them out for inaction.

It is therefore disappointing that companies involved in the construction of World Cup stadiums did not respond, including **Al Balagh Trading & Contracting**, **Cimolai**, **Galfar Al Misnad**, **HBK Contracting Company**, **J&P Avax SA**, **Joannou & Paraskevaides (Overseas)**, **Midmac** and **Porr**. The lack of response represents a missed opportunity to demonstrate the actions they are taking to adhere to the Workers' Welfare Standards of Qatar's Supreme Committee for Delivery & Legacy.

It is similarly disappointing that regional construction heavyweights with active projects in Qatar and the UAE – **Arabtec**, **BK Gulf** (a subsidiary of UK-headquartered **Balfour Beatty**), **Habtoor Leighton Group**, and **Al Jaber Group** – did not respond, despite the three former companies receiving the UAE's 2016 Taqdeer Award for excellence in labour relations.

¹ <https://business-humanrights.org/en/qatari-subsiidiary-of-eta-star-ascon-group-failing-to-pay-migrant-workers-leaving-them-stranded-as-the-gulf-country-struggles-to-juggle-its-ambitions-for-the-2022-world-cup-with>

² VINCI (QDVC) operates in Qatar through QDVC, a Qatari Shareholding Company incorporated under the Law of Qatar since April 2007. Qatar Diar Real Estate Investment Company is 51% shareholder in the company and VINCI (QDVC) Construction Grand Projects is the shareholder of the remaining 49%.

Recent national attention to migrant workers' rights in the Gulf has focused on driving improvements in health and safety, worker accommodation and payment of wages. Now it is time for concerted action in other critical areas such as fair recruitment, freedom of movement, worker voice, and supply chain accountability. In each of these areas our outreach identified examples of action that other companies can follow.

For example, on freedom of movement, **Vinci (QDVC)** and **Laing O'Rourke** provide secure, personal storage compartments at their accommodation facilities so that migrant workers have sole custody of their passports. On recruitment, seven companies stated that they follow the employer pays principle with regards to recruitment fees. **Laing O'Rourke**, **Multiplex**, **Salini Impregilo**, **SNC-Lavalin** and **Vinci (QDVC)** said that they ensure migrant workers are reimbursed by the company or recruitment agency in the event that they have been made to pay fees. Another six companies stated that they would terminate their business relationships with recruiting agencies that violate their terms. **Carillion**, **Laing O'Rourke** and **Salini Impregilo** pointed to a global policy on freedom of association and providing workers in their Gulf operations with alternative means of expression and collective organising through worker welfare committees.

A significant challenge facing the industry is the complexity of its supply chains. As the head of the UK's Chartered Institute of Building has acknowledged: "[T]he global trend towards outsourcing and cut price contracting makes it easy for main contractors to duck out of their responsibilities."³

In that vein it is encouraging that some firms are taking steps to strengthen accountability down the supply chain. **Interserve** has instituted a Worker Welfare Procedure that requires subcontractors and suppliers to prequalify on the basis of their employee welfare practices; their

compliance is subsequently monitored through audits and 'worker engagements'. The risks inherent in accepted business models and complex supply chains, however, cannot be resolved by companies acting in isolation: collective industry-wide efforts will also be needed.

Some companies have also demonstrated welcome engagement with international trade unions. Given that freedom of association is not permitted within Qatar and the UAE, this can be an important way to provide a degree of civil society oversight. **Salini Impregilo** has signed an agreement with Building and Woodworkers International (BWI) and Italian construction unions to promote and respect the fundamental human rights of its workers worldwide, and has allowed BWI to visit its worker accommodation in Qatar.

Committed and concerted action by the construction industry holds the potential to prevent exploitation and drive genuine improvements in the lives of millions of workers around the world. While our outreach has identified some promising leading examples, the entire sector has a long way to travel to fulfill its human rights commitments. In responding to the risks of exploitation in its supply chains it can draw important lessons from sectors that have long been scrutinized such as the apparel, food and electronics industries. Within Europe, the UK's Modern Slavery Act has played an important role in kick-starting action by the sector⁴: it is striking that of the 22 responses we received, 11 are from companies headquartered in Europe where the influence of the Act has been felt more strongly.

Conversely, only three companies headquartered in the Gulf responded and none headquartered in Asia (from Asia, we approached companies based in China, India, Japan, Malaysia and South Korea). There is an urgent need to strengthen the competitive advantage within all regions for construction firms to take a responsible approach to the recruitment and employment of migrant workers.

³ The Chartered Institute of Building (CIOB), 2015. Modern Slavery: The Dark Side of Construction. Available at: <https://policy.ciob.org/wp-content/uploads/2016/02/CIOB-Research-The-Darkside-of-Construction.pdf>.

⁴ The Act requires every organisation with a global annual turnover of £36 million with operations in the UK to produce a slavery and human trafficking statement for each financial year. View the BHRR MSA registry here: <https://business-humanrights.org/en/uk-modern-slavery-act-registry>

Business partners and civil society actors should press for increased transparency from companies, rewarding those that take a responsible approach to the recruitment and employment of

migrant workers and drawing attention to company inaction and discrepancies between reporting and implementation.

Companies should:

Adopt a public human rights commitment and conduct robust due diligence.

Take urgent action to protect migrant workers in key risk areas.

Ensure workers have access to individual and collective grievance mechanisms.

INTRODUCTION

An estimated 7 percent of the world's workforce is employed in the construction sector, an industry that represents \$US 9 trillion globally and is expected to account for 15% of global output by 2030. Migrant workers form the lifeblood of the workforce, "essential to provide the flexible supply of labour needed to meet volatile demand...and reduce shortages when activity expands rapidly."⁵

Construction in the Gulf is no different in its reliance on migrant workers, and the sector is growing rapidly. The total value of projects planned across the Gulf States was valued at US\$2 trillion in May 2016, having grown by an average annual rate of 5% over the last five years. Qatar has the fastest growing construction market in the world⁶, boosted by the infrastructure development for the 2022 World Cup, and Dubai is ramping up its construction activities ahead of the World Expo 2020.

While the region has had a long-standing reliance on migrant labour – the Gulf States were collectively host to 22 million workers in 2013 - the international reach, physical scale and demand for migrant labour on these projects are unprecedented. International concern over migrant workers' rights has grown as a result, particularly in regards to the exploitative potential of transnational recruitment routes and the Gulf's kafala (sponsorship) system.

A slew of reports have documented the human rights risks and abuse associated with migrant

construction labour in the Gulf (see Annex 1). Workers often fall victim to:

- Excessive debt incurred through high recruitment fees
- Unequal, late, or non-payment of wages or illegal deductions
- Appalling living conditions
- Treacherous working conditions
- Denial of freedom of movement
- Denial of freedom of association and assembly
- Minimal enforcement of the labour law
- Limited or no access to recourse to alter their plight
- Forced labour

Under the 2011 United Nations Guiding Principles on Business and Human Rights, companies have a responsibility to ensure that human rights are being respected in their direct operations and in their supply chains. While international bodies and civil society have called for action from Gulf governments to fulfill their state duty to protect workers' rights and institute labour reform, construction companies involved in the building of flagship projects have not been held to account for the treatment and working conditions of their migrant workforce. Business & Human Rights Resource Centre's outreach was hence designed to draw attention to the conduct of companies and the trailing of the sector as-a-whole.

⁵ Green, B., 2015. CIOB Perspectives: An Analysis on Migration in the Construction Sector. Available at: https://www.ciob.org/sites/default/files/CIOB%20research%20-%20Analysis%20on%20Migration%20in%20the%20Construction%20Sector_1.pdf

⁶ Global Construction Perspectives and Oxford Economic (2013). Global Construction 2025. Available at: <http://bit.ly/2ge5t6k>

⁷ Kafala is the system of worker 'sponsorship' that governs the recruitment, employment and residency of migrant workers the Gulf. For a full explanation see Migrant Rights, 2015. Understanding Kafala: An Archaic Law at Cross Purposed with Modern Development. Available at: <https://www.migrant-rights.org/2015/03/understanding-kafala-an-archaic-law-at-cross-purposes-with-modern-development/>



THE COMPANY SURVEY

In 2016, Business & Human Rights Resource Centre invited 100 construction companies to respond to questions on their approach to ensuring the rights of migrant workers in their Qatar and UAE operations. We launched the survey in recognition of the minimal attention to the corporate responsibility to respect human rights within this particular context and to increase transparency around construction firms' operations. Business transparency is a key driver of improvement: it enables the sharing of best practice and strengthens accountability for companies' stated action and inaction

We selected companies based on two criteria: 1) companies awarded contracts in Qatar and the UAE between 2014 and 2016 valued at least USD\$ 50 million and 2) companies involved in the infrastructure for the 2022 World Cup, Expo 2020 Dubai and other mega-projects.⁸ In cases where the construction was awarded to joint ventures or consortia we contacted all companies involved.

We adapted the survey based on the company's main country of operations as per our selection criteria.

We contacted 55 companies in relation to Qatar and 45 companies in relation to UAE.

The analysis is inclusive of the responses received by November 21, 2016. We drew on guidance published by [Building and Wood Workers International \(BWI\)](#), [Human Rights Watch](#) and our own knowledge and experience to analyse the responses. In doing so we identified 10 key areas of focus on which we based our assessment of company responses:

1. Public commitment
2. Health & safety
3. Accommodation
4. Recruitment
5. Contracts
6. Payment
7. Freedom of movement
8. Worker voice
9. Grievance mechanism
10. Subcontractor compliance



FINDINGS

Transparency

Of the 100 companies we contacted, only 22 responded to our survey (17 construction firms, 4 project management/engineering consultants, and 1 developer). An additional company, **Alstom**⁹, is in the process of preparing a response and we welcome additional responses from companies at any time.

To ensure comparability we have excluded the non-construction firms from the main analysis of the findings, but have captured the key learnings from their responses in Box 1.

The table on the next page provides a snapshot of what information companies provided and how much they disclosed in each area.

⁸ Qatar: World cup stadiums, Doha Metro and LRT, Lusail City, Education City, Msheireb, The Pearl Qatar, Doha Expressway and roads. UAE: Airports, Dubai Expo Rail Link 'Expo 2020', Dubai Parks & Resorts, Dubai Opera District, Dubai Creek Harbour projects, Saadiyat Island projects, MBR City, Habtoor City, Bluewaters, Palm Jumeirah.

⁹Alstom manufactures, installs and markets systems, equipment and services for the railway market. It operates in Qatar in a consortium with QDVC on the light rail transit LRT) project.

	Human rights Commitments	Health & Safety	Accommodation	Contracts	Payments	Freedom of movement	Worker Voice	Grievance	Recruitment	Subcontractor compliance	
Vinci	●	●	●	●	●	●	●	●	●	●	
Multiplex	●	●	●	●	●	●	●	●	●	●	
Salini Impregilo	●	●	●	●	●	●	●	●	●	●	
Laing O'Rourke	●	●	●	●	●	●	●	●	●	●	
Interserve	●	●	●	●	●	●	●	●	●	●	
Carillion	●	●	●	●	●	●	●	●	●	●	
Al Futtaim Carillion	●	●	●	●	●	●	●	●	●	●	
SNC-Lavalin	●	●	●	●	●	●	●	●	●	●	
TAV Construction	●	●	●	●	●	●	●	●	●	●	
Aktor	●	●	●	●	●	●	●	●	●	●	
Al Naboodah	●	●	●	●	●	●	●	●	●	●	
Yapi Merzeki Insaat		●	●	●	●	●	●	●	●	●	
QD-SBG	●	●		●	●	●	●	●	●	●	
Sent a general statement											
Besix	●	●	●		●		●	●	●	●	
Hochtief	●	●					●	●		●	
Bouygues	●									●	
Van Oord	●										
Not yet responded											
Alstom	<i>Indicated it will respond</i>										
Key:	●	●	●	degree of relevant = information provided in the answer			●	example of good = practice in the information disclosed			




BOX 1 The human rights responsibility of clients and consultants

We contacted a number of developers and project management consultants to share information on their approach to migrant workers' rights in their business relationships. With regard to clients and developers there appears to be a gulf between those that have introduced worker welfare standards – [Qatar Foundation](#), Qatar's [Supreme Committee for Delivery and Legacy](#), and Abu Dhabi's [Tourism & Investment Development Company](#) – and those that view workers' rights to bear no relation to their operations and/or as the sole purview of the principal contractor.

We found more of a spectrum of engagement among project management and engineering consultants. CH2M has developed a detailed worker welfare policy that is used to advise clients on international labour standards and applies to the company itself and all of the contractors in its supply chain. Atkins shared its 'Minimum Requirement for Construction Safety' and disclosed information on the firm's approach to ensuring health and safety on the sites that it manages, but in answer to questions on recruitment, payment, grievance mechanisms etc. the company stated that it has "no responsibility nor influence in this area". Parsons and Bechtel both have a public commitment to human rights and are members of the Global Reporting Initiative and the Global Business Initiative on Human Rights, respectively. Mace responded that the questions were not applicable to its business operations as a consultant.

What emerges is a mixed picture of understanding of the corporate responsibility for human rights among actors higher up the supply chain as well as varying levels of commitment to exert their sphere of influence. It is essential that these businesses become alert to their "moral duty not to collude in the exploitation of vulnerable people. Clients and principal contractors should take a responsible attitude to exploitation, even if they are not obliged to do so contractually. It's all being done in their name, after all".⁹



⁹ McMeeken, R., 2015. 'Crossing the line'. Building. Available at: <http://www.building.co.uk/5077183.article>

Public commitment to human rights

Thirteen (77%) of the 17 responding construction firms have a public commitment to human rights in a stand-alone human rights policy or as part of their sustainability and CSR policies, Codes of Conduct, or sustainability reporting.

Looking at the wider sample of 100 companies, only 39% have expressed explicit human rights commitments, which communicates a concerning lack of awareness or willingness to address human rights. On the other end of the spectrum, several of the responding companies have developed human rights/welfare policies and procedures specific to their operations in Qatar and the UAE in recognition of the heightened human rights risks to their migrant workforce in these countries.

As well as its [public commitment to human rights](#), **Vinci (QDVC)** has a Workers' Welfare and Human Rights Policy specific to Qatar. The company has also established a Human Rights Committee which includes the human resources directors of companies located in "potentially sensitive regions."

Multiplex has a [Welfare Policy Statement](#) and set of Welfare Principles, which the company's Middle East Executive Board ratified in October 2016. The company names 8 of the welfare principles in its survey response: 1. Employment Standards, 2. Working Conditions, 3. Living Conditions, 4. Recruitment Practices, 5. Access to Information and Documents, 6. Education and Training, 7. Fairness and Integrity, 8. Grievances and Labour Disputes. The company has simultaneously instituted a 'Welfare Management System' that includes audits to ensure that subcontractors, recruitment agents and accommodation facilities adhere to the Multiplex Welfare Policy and Principles.

Carillion's [group-wide](#) and [regional MENA](#) sustainability reports for 2015 both acknowledge the human rights risks in the company's Qatar operations and the measures that have been introduced to prevent and mitigate worker abuse.

Other indications of public commitment to human rights include companies' engagement with civil society and trade unions. **Salini Impregilo** has signed an [international agreement](#) with Italian and international construction unions to promote and respect fundamental human rights principles as defined by the UN, ILO and OECD. The company [participated in a meeting hosted by BWI](#) on the working conditions of migrant workers in Qatar and its worker accommodations have been visited by a BWI delegation.

The chairman of Laing O'Rourke has taken a public stance on business leaders' responsibility to tackle modern slavery, describing his company's response to the discovery of exploitative recruitment practices in its supply chain in a [2015 Huffington Post blog](#) following the passing of the Modern Slavery Bill.

Other companies have demonstrated their commitment to ongoing improvement of their policies and procedures in the updates to their survey responses (Aktor, Carillion, Interserve and Vinci (QDVC)) and through providing examples of planned improvements, e.g. "the Company plans to form a joint committee with representatives of its workforce and Joint Venture management" (*Yapi Merkezi Insaat, 2015*).

Health and safety

The health & safety (H&S) of migrant workers on construction sites is a serious concern given the risk of injury and death associated with the hazardous work conditions. According to the ILO, construction workers are three to four times more likely than other workers to die from accidents at work, and this roughly equates to 108 thousand workers killed on site each year. Deaths on World Cup sites have been the subject of intense controversy. In 2013 the Guardian released [devastating footage](#) of coffins returning to Nepal from Qatar containing the bodies of construction workers.

A [recent study](#) assessing the cause of construction accidents in the Gulf found that the most common types of worker accidents involved falling or being hit by objects as is the case in other parts of the world. The researchers pointed to several factors that make occupational hazards worse in the Gulf, including inadequate training, limited use of safety equipment and weak enforcement and regulation.

In the company responses we received, twelve (71%) of the companies referred to their H&S training programmes and eight (47%) made specific mention of providing workers with personal protective equipment. Fourteen companies (82%) reported being certified or audited in accordance with internationally-recognized H&S standards, while 71% also reportedly carry out their own inspections.

Eleven (65%) of the responding companies provided statistics on accidents and fatalities in their Qatar or UAE operations. **Vinci (QDVC)** reported two worker fatalities: a subcontracted worker in 2015, and a worker employed by one of its JV partners on the Metro Red Line South in 2016. **Interserve's** subsidiary **Gulf Contracting Company** also reported the death of a worker employed by a subcontractor, while **QD-SBG** reported a fatality in an off-site store area. While all companies should be working towards zero fatalities, it is important that

companies are transparent about worker deaths when they do occur.

In the event of an injury, 8/17 companies (47%) confirmed the presence of trained medical personnel on site. **Vinci (QDVC)** was the only company to detail the steps it undertakes following an incident.

Although the substance and detail of the answers varied between companies, the responses clearly convey that there are accepted industry-wide policies and procedures on health and safety that companies are expected to adhere to as a minimum. The task for the industry and its advisors now is to build on the foundation that health and safety certification provides and attach the same importance and operational rigour to other aspects of migrant workers' rights.

Accommodation

The appalling living conditions of migrant construction workers in Qatar and the UAE have been the subject of media attention, prompting clients to introduce standards for worker accommodation that exceed the requirements of the labour law (see Box 1).

We asked companies what policies and procedures they have in place to ensure adequate worker accommodation. Forty-seven percent (8/17) described their approach, including regular audits and inspections by the company, meetings with accommodation providers, comment boxes and/or convening of workers. Almost 60% (10/17) reported being externally audited by government bodies, clients and/or civil society and independent consultants. **Besix**, **Salini Impregilo**, and **Vinci (QDVC)'s** worker accommodations have been visited by BWI.

AI Futtaim Carillion reported that it conducts “detailed reviews” of rental accommodation in advance of contracting with landlords and performs regular audits to ensure standards are maintained. The company communicates workers’ concerns to accommodation providers at regular meetings and works with them to implement necessary improvements. **Carillion** also follows these procedures and has reportedly employed a dedicated team to audit new and existing subcontractor staff accommodation. The company stated that “should [subcontractors] be unwilling to meet our required standards or make the necessary improvements they are removed from our Project”.

Recruitment

Systems to recruit migrant workers are notoriously exploitative. Workers are frequently charged high recruitment fees by local employment agencies or agency intermediaries in their home countries, often forcing them to take out high-interest loans or to sell their land and possessions in order to secure work. The resulting situation is one of debt-bondage, with workers unable to negotiate fair pay or decent working conditions at the risk of losing their sole source of income.

While companies alone cannot resolve the challenges associated with recruitment, they can take steps such as:

- Recruiting directly, or in contexts where this is not possible, employing recruitment agencies with established records in fair recruiting
- Ensuring workers do not pay any recruitment or placements fees
- Reimbursing fees to workers if they are found to have paid recruitment fees

BWI recommends that companies terminate their relationships with recruitment agencies that violate these terms.

Ten companies (59%) inferred some degree of direct involvement in the recruitment process (e.g. through in-country interviews, recruitment visits, spot checks etc.). Eleven companies (65%) stated that they have a no fee policy, but only 7 of these made explicit mention of bearing the cost of recruitment (i.e. employer pays principle).

AI Futtaim Carillion and **AI Naboodah Construction Group’s** responses indicate that there are instances in which their employees pay some of the expenses associated with recruitment, but that these amounts are capped. Employers are expected to cover recruitment costs under UAE labour law, but payment of recruitment expenses by migrant workers may be permissible in their home countries.

In cases where workers are found to have paid fees, five companies - **Laing O’ Rourke**, **Multiplex**, **Salini Impregilo**, **SNC-Lavalin** and **Vinci (QDVC)** - referred to a policy of worker reimbursement (either by the company or the recruiting agency). Six companies asserted that they would terminate their business relationship/ remove the agency from their preferred supplier lists if found to be charging fees: **Aktor**, **AI Futtaim Carillion**, **AI Naboodah Construction Group**, **Carillion**, **Salini Impregilo**, **Yapi Merkezi Insaat**.

Example of how companies are tackling exploitative recruitment

Employer plays principle

Laing O'Rourke asserted that it follows a rigorous and stringent process when identifying recruitment providers and requires them to uphold the standards set out in the company's Code of Conduct. The company pays the recruitment fees directly to the agency as well as flights and pre-recruitment medical costs.

Contract clauses

Salini Impregilo stated that it includes specific human-rights related clauses in its contracts with recruitment agencies, one of which prohibits charging recruitment fees.

Acting on due diligence

Vinci (QDVC) detailed the mechanisms it has introduced to prevent workers paying recruitment fees, following a detailed inquiry into the areas of vulnerability in its recruitment chain. These include:

- All advertisements in local newspapers mention a “free recruitment policy”, are featured in the workers’ native language, and are validated by the company beforehand.
- Workers are issued with a Workers’ Rights and Induction Booklet (available in English, Hindi and Bengali) during their recruitment, with information on the process, their rights and the living and working conditions at QDVC.
- The company’s service agreement with recruitment agencies prohibits the sourcing or pre-selection of candidates by anyone other than their own registered agents, and a temporary hotline is established so that candidates can communicate directly with the company recruitment officer.
- Workers are surveyed upon their arrival to verify they have not paid any fees, and the survey is repeated again after 3 and 6 month intervals.

In the event that workers have been “unrightfully charged”, Vinci (QDVC) mandates that the recruitment agencies reimburse expenses. Seventy-six of **Vinci (QDVC)**'s workers were reimbursed fees in September 2016 as a result of these mechanisms.

Contracts

Another type of exploitation that takes place during the recruitment process is that of contract misrepresentation or substitution. In such cases, the terms and conditions of the contracts that workers sign in the country of destination differ from the offer they received before they migrated and often entail much lower pay. Workers who have paid recruitment fees can therefore find themselves in situations akin to forced labour as they have no option but to work for lower wages to meet their debt repayments.

Both the BWI and HRW guidance contain advice for construction firms to counter this exploitative practice.

The common elements are that: the contract should be provided to workers in a language they can read and understand, the contracts should not be subject to modification on the workers' arrival in the country of destination, and companies should be involved in the recruitment process either through direct hiring or diligent oversight of recruitment and labour supply agencies.

Ten companies (59%) said that they provide workers with a contract in a language that they understand. Other companies like **QD-SBG** and **Yapi Merkezi Insaat** only do so on request by the worker and **Interserve** indicated only doing so verbally.

Ten companies also stated or provided procedural detail to the effect that workers' contracts are not subject to modification on the workers' arrival. Aside from the companies that provided general statements, the companies that did not mention a policy or measures in relation to contract substitution were **Aktor** and **Yapi Merkezi Insaat**.

Vinci (QDVC) disclosed the provisions outlined in workers' contracts, which cover "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."

Only four of the company responses referred to procedures currently in place to ensure that recruitment agencies and subcontractors comply with company policies regarding contracts: direct and comprehensive oversight (**Laing O'Rourke**), prequalification criteria and penalties for violation (**Interserve**), contractual obligations (**Salini Impregilo**), audits (**Vinci (QDVC)** and **Multiplex**).

Payment

The UAE and Qatar have introduced Wage Protection Systems (WPS) in recent years (2009 and 2015 respectively) to address the issue of late payment of wages and unauthorised deductions from migrant workers' salaries. The WPS is an electronic payment system whereby the employer sets up a personal bank account for each worker and transfers their salary into it on a monthly basis. The WPS transfers all records of payment to the Ministries of Labour, enabling them to detect salary delays and deductions and impose penalties on companies that fail to pay their workers their complete dues in a timely manner.

While the WPS has been a step forward in regards to detection of wage violations, its protective capacity is less certain. In the wake of plummeting oil prices, governments and clients have been unable to pay contractors, the impact of which has reverberated down the contracting chain, leaving workers stranded without pay, sometimes for months on end. In the most catastrophic case reported this year, foreign [governments were compelled to step in to assist thousands of stranded migrant workers in Saudi Arabia](#) as **Saudi Oger**, one of the country's biggest construction conglomerates, buckled under debt.

According to their survey responses, 14 (82%) companies pay workers according to national legislation/WPS. Nine (53%) of the answers also made specific reference to issuing personal bank cards to workers. **Al Naboodah Construction Group** and **Al Futtaim Carillion** have ATMs at their worker accommodation facilities.

Multiplex acknowledges the challenges associated with the timely payment of workers along the supply chain and stated that it has intervened in the past year to “ensure workers are adequately compensated when a subcontractor has failed to pay wages” and renew residency permits.

The discrepancy between the broad adoption of the Wage Protection System and the persistence of late/unpaid wages raises pressing questions regarding the efficacy and enforcement of the WPS, the timely distribution of payments along the contracting chain, and oversight of subcontractors’ payment practices. The focus on the WPS also detracts attention from other critical wage issues, such as equal pay for equal work (rather than on the basis of nationality).

Freedom of movement

The Gulf’s kafala (sponsorship) system has been the subject of intense criticism for its potential to trap migrant workers in abusive conditions. Under kafala, a migrant worker is tied to their kafeel (sponsor) and requires their permission to transfer employment and to obtain an exit visa to leave the country. There are no exit visa requirements in the UAE¹⁰. Coupled with the widely reported practice of passport retention, migrant workers can effectively be held captive by their employers.

Within this context, BWI specifies that companies should allow workers to change jobs should they choose to do so, should provide on demand exit-visas and no objection certificates (NOCs) without delay to employees wishing to leave the country, and should not confiscate or withhold workers’ passports unless the worker agrees in writing and they have easy accessibility to their passports.

Fifty-nine percent of the responding companies stated that they provide employees with NOCs

and/or exit visas on request. Minimal procedural detail could be gleaned from the answers, but indications of better practice included reference to having a systematic procedure in place, providing NOCs with no conditions attached, and issuing exit visas on demand irrespective of the reason for departure.

TAV Construction reported withholding workers’ passports for safekeeping and making them available to workers upon request. The remaining majority described a converse system to this, whereby workers retain their own passports unless they specifically request in writing for the company to store them on their behalf. The latter practice is nominally acceptable, but relies heavily on the assumption that companies have transparent, accessible and efficient procedures to return passports to workers on request. Where this is not the case, the result for the worker is much the same as having their passports withheld.

Just two companies – **Laing O’Rourke** and **Vinci (QDVC)** – outlined a policy in which workers retain the sole custody of their passports. Both companies provide workers with personal locker/deposit boxes in their accommodation. In the event that Vinci (QDVC) requires workers’ passports to process their residency permits, the company provides workers with a photocopy of their passport and a receipt that states the company’s commitment to return the passports upon completion of the application or renewal.

Worker Voice

The formation of trade unions and freedom of association are restricted in Qatar and the UAE. This creates an additional challenge for migrant workers, already in a position of limited bargaining power due to debt and insecure residence status, to assert their rights.

¹⁰ http://www.employmentlawalliance.com/Templates/media/files/Immigration%20Overviews/Qatar_UAE.DOC

The HRW guidelines advise construction companies to provide regular fora for migrant workers or worker representatives to discuss work and rights-related matters and concerns directly with management. In our survey, only 47% of responding companies made reference to worker fora distinct to health & safety committees. The majority of the company responses did not provide any detail on the operation of these fora, save to say that they exist and the types of issues discussed.

In its response, **Salini Impregilo** wrote that it “seeks to give employees alternative means of expression. [The] Migrant Workers Camp committee, formed by workers, residents’ representative and the heads of all Camp Departments, is in place to examine and discuss once a month issues of mutual concern. Input for discussion comes from the suggestions, grievances or any other comments submitted by the workers through the Comment Boxes available at all the Common Camp Areas. The Welfare Office weekly collects, catalogues and records all the received messages, in order to be examined during the monthly meeting.

Aktor asserts that its Workers’ Advisory Committee is “not precluded from collective bargaining and the workers are not restricted from industrial action if they feel that their grievances are not being addressed”.

The guidelines also call on companies to “respect workers’ rights to freedom of association and collective bargaining to the maximum extent permitted by national law.” Only five companies cited a group-level policy on freedom of association in their responses, pointing to a worrying lack of commitment to migrant workers’ rights to freedom of association and collective bargaining that extends beyond national legislation.

While the facilitation of migrant worker welfare committees is a step in the right direction, effective curtailment of labour abuses requires meaningful worker participation to identify risks and abuse and contribute to solutions and enforcement. The [worker-driven social responsibility model](#), or WSR, provides a framework for worker organization that can be adopted by companies across their operations, and is practicable to a degree in the Gulf context.

Grievance mechanism

The restrictions on freedom of association make the provision of accessible grievance mechanisms all the more important. HRW’s guidelines recommend that companies establish “an anonymous internal complaints process through which workers can lodge workers’ rights-related concerns and ensure that they are aware of the process.”

Eighty-eight percent (15/17) of responding companies indicated having some form of grievance mechanism in place for their workers. The types of mechanisms referred to included grievance and comment boxes, whistle-blowing hotlines/e-platforms, employee welfare committees and designated welfare officers or ‘grievance receivers’, often in some combination. Sixty-five percent (11/17) reported having an anonymous channel for employees to submit grievances.

Seventy-one percent (12/17) described how they communicated the mechanisms to migrant workers. Examples include verbal communication through 1:1 meetings with supervisors or in various worker fora, notice boards and posters, handbooks and leaflets, explanatory films and Multilanguage comment cards that explain how to submit grievances.

The company responses were weakest on their descriptions of the procedures in place to address and remedy grievances and on preventing retaliation against workers. Just four companies -

Laing O'Rourke, Multiplex, Salini Impregilo and Vinci (QDVC) - communicated a systematic procedure for addressing grievances once they were reported.

Multiplex described its formal "Investigation and Remediation Protocol" that prescribes how the Welfare Team and operations staff process, address and remedy a grievance. In order to create trust in the mechanism and protect workers from retaliation the Welfare Team is "an independent functional department [...] removed from the operational delivery team members such as Supervisors etc."

According to the company: "Upon receipt of a grievance, the Welfare Team will perform an assessment against a set of pre-determined risk factors to determine whether the grievance should be categorised as 1, 2 or 3. The resultant grievance categorisation then determines which parties the grievance is escalated to and timescales for response." As part of the protocol Employees receive information about what has been done to remediate the grievance.

Vinci (QDVC)'s response outlined the company's practice of displaying Workers' Welfare Committee minutes in English and Hindi on notice boards on site, in the workers' community and via email. The minutes record the issues raised, the solution or whether the issues are still pending.

Interserve, Laing O'Rourke, and Salini Impregilo stated a policy of taking disciplinary action (including termination) in instances where workers have faced retaliation for expressing grievances.

Subcontractor Compliance

"[O]ur business models must take a large part of the blame: the global trend towards outsourcing and cut price contracting makes it easy for main contractors to duck out of their responsibilities. The plight of the most vulnerable gets lost among the long and complex supply chains. It's too convenient to blame the subcontractor or poor local legislation. You might think that modern slavery is not a problem where you work. Think again."

This quote from CIOB's report 'Modern Slavery: The Dark Side of Construction' captures the high risk of migrant worker abuse embedded in the long, fragmented and complex supply chains of construction companies. It also highlights the responsibility of main contractors and others at the top of the supply chain to conduct human rights due diligence and ensure that human rights violations are not occurring down their supply chains.

BWI and HRW guidance mention several mechanisms for companies to ensure and enforce the rights of migrant workers hired by their subcontractors. These including legally binding worker-rights provisions in contracts, and requiring subcontractors to include similar provisions in their own contracts, thereby cascading worker welfare standards down the supply chain.

We asked companies to describe the approach they take to monitoring and enforcing their worker rights policies in their business relationships (e.g. with recruitment agencies and subcontractors).

Eighty-two percent of the companies articulated their expectations that subcontractors comply with their standards and policies, and 65% provided indication of how they oversee subcontractor compliance in at least one key area e.g. audits and removal of violators from preferred suppliers lists.

Notably, procedures for monitoring subcontractors were most often mentioned in relation to accommodation and health and safety, but far less so in the context of other critical areas such as recruitment, grievance, wage payment, contract substitution and passport retention. Only three companies – **Interserve**, **Multiplex** and **Vinci (QDVC)** - described clear, embedded procedures across their operations vis-a-vis subcontractors.

Besix and **Hochtief** pointed to their supplier codes of conduct, which are contractually binding. [Besix's Sustainable and Responsible Procurement Code of Conduct](#) includes specific stipulations on human rights, employment standards and health & safety. The company's suppliers and subcontractors are committed to comply with the company's Code from the tender stage to completion and is required to "fully and transparently" participate in audits by the Besix Group, which can happen at any time.

Interserve detailed the specifics of its new 'Worker Welfare Procedure': "We operate a prequalification process for our subcontractors / suppliers which covers sustainability, health and safety, welfare, employment practices and management and supervision. Failure to reach an acceptable score would result in the subcontractor / supplier not prequalifying as would non-compliance with any items noted as mandatory." Post-qualification the company conducts audits and worker engagements to monitor subcontractor compliance on wage payment, accommodation, recruitment, provision of health-care, and preventing passport retention and contract substitution. The worker engagement process also provides employees who do not work for the company directly with an opportunity to raise concerns.



DISCUSSION OF THE CORPORATE RESPONSE

Transparency

The most striking result of our survey was the severe lack of transparency from the construction companies we invited to respond. Only 22% of the companies responded. In comparison, 80% of companies submit responses when approached to respond to human rights concerns raised by civil society. The response rates to our recent surveys of human rights risks facing clothing brands in Turkey and of global renewable energy companies were 68% and 40%, respectively.

Beyond the survey, only 39% of the 100 companies have a publically available commitment to human rights. Just 3 have a policy that explicitly references the protection of migrant workers. This lack of commitment is alarming given the widespread exploitation and abuse faced by the large numbers of migrant workers employed in the construction industry globally, and in Qatar and the UAE in particular.

The current wage crisis that is sweeping Gulf countries proves that companies cannot rely on national legislation or the operational status quo to protect migrant workers' rights. In the wake of plummeting oil prices, governments and clients have been unable to pay contractors, impacting subcontractors and workers down the supply chain. Furthermore, the widespread and nominally acceptable practice of retaining worker passports for safe-keeping has failed to protect workers when companies have become embroiled in debt. Recent instances of stranded workers across the Gulf ([Qatar](#), [UAE](#), [Saudi Arabia](#), [Bahrain](#), [Kuwait](#) and [Oman](#)) abandoned without pay, accommodation and food, sometimes for months on end, are a clear demonstration that current worker protections are wholly inadequate.

There is a small group of forerunners that have disclosed meaningful information on their policies and procedures to protect migrant workers in their Gulf operations. The risks inherent in accepted business models and complex supply chains,

however, can not be resolved by companies acting in isolation: collective industry-wide efforts will also be needed. As it stands, the current lack of industry transparency limits the ability of companies to tackle shared challenges and move forward together on the basis of agreed-upon standards and good practice.

In 2015, the UAE launched the 'Taqdeer Award' to award construction firms for excellence in labour relations. The initiative reflects the important awareness within the region of driving a race to the top by recognizing strong labour practices and giving winners priority for future government projects.

Al Futtaim Carillion was the only Taqdeer Award winner to respond to our survey. It is disappointing that the other Taqdeer Award companies that we contacted - **Arabtec**, **BK Gulf**, **Dutco Balfour Beatty**, **Habtoor Leighton Group** and **United Engineering Construction** – did not respond.

It is particularly disconcerting seeing as several of the Award winners have been linked to allegations of migrant worker abuse in the past: **Arabtec** and **Habtoor Leighton Group** were featured in a [2009 Human Rights Watch report](#) on migrant labour exploitation on Abu Dhabi's Saadiyat Island and **BK Gulf** (a subsidiary of **Balfour Beatty**) was recently linked to [allegations of worker abuse in Qatar](#). The companies responded to the allegations at the time (follow links).

The lack of public disclosure from this group of companies, as well as other companies committed to human rights and disclosure, is a squandered opportunity to showcase the actions they are taking that purportedly merit recognition and to share best practice for others to follow suit.

Impetus

A clear and urgent challenge is how to incentivize companies in all regions to take a

responsible approach to the recruitment and employment of migrant workers and to report on those steps. **Vinci (QDVC)** touches on this in its 2016 survey response: *“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. [Changes are needed] to help compliant contractors to remain competitive and create positive incentives for the rest of the industry.”*

Some of the push factors for responsible action can be drawn from the examples of pioneering companies: **Salini Impregilo’s** engagement with international and Italian trade unions has led to a global commitment to protect and respect the human rights of its employees, while **Laing O’Rourke’s** leadership has expressed public support for the Modern Slavery Act and embraced the responsibility of business leaders to confront modern slavery in their supply chains. **Carillion** and **Interserve** similarly cite the Act as a catalyst for action in their most recent sustainability reports.

In addition to binding commitments and mandatory transparency, independent scrutiny from civil society, media and industry experts is also an essential catalyst for change. Both **Carillion** and **Interserve** have been at the centre of recent media reports documenting cases of migrant worker abuse tied to their Qatar operations. In 2015, the NGO Sherpa filed a complaint against **Vinci (QDVC)** in a French court, alleging forced labour in the company’s Qatar operations. **Vinci (QDVC)** filed a defamation lawsuit against Sherpa in response.

What is clear from these examples is that driving progress on human rights across the industry requires a multi-stakeholder approach that includes governments, intergovernmental organisations, companies and their business partners, civil society, trade unions, journalists and other concerned entities.

Action

Our outreach to companies identified examples of action for the rest of the industry to heed and follow. Among these are short-term steps that companies can take to have an immediate impact on migrant workers’ rights such as, installing personal safes for workers at their accommodation

so that they retain exclusive custody of their passports.

That said, implementing the corporate responsibility to respect human rights is a continuous process and one that takes time, and the construction sector is only at the start of the road. In responding to the risks of exploitation in its complex supply chains it can draw important lessons from sectors that have long been scrutinized such as the apparel, food and electronics industries. Furthermore, companies’ existing commitments to health and safety throughout their supply chains, and the understanding and broad adoption of accompanying standards and certification, provides a foundation for companies to make progress in other areas of workers’ rights.

The restrictions on migrant workers’ rights to freedom of association and collective bargaining and weak access to remedy is a critical challenge for companies. Few of the survey responses communicated clearly defined, formal procedures to educate workers on company welfare policies and labour rights or to process individual and collective grievances in a transparent, predictable and accountable manner. It is critical that companies explore ways to engender meaningful worker participation in line with international labour standards and, in-so-far as possible, a worker-driven social responsibility model.

Concluding remarks

The survey responses, although scarce in number, clearly demonstrate that the construction industry is aware of the risks to vulnerable migrant workers in its supply chain and is exploring ways to prevent exploitation.

Now is the time for companies with poor disclosure to emerge from behind their wall of silence on human rights. The sector might have previously escaped the scrutiny of consumer-facing sectors, but that is no longer the case. The attention to the human-rights performance of the construction industry spurred by the Qatar World Cup has resulted in a concerted focus on the sector and its business partners from international institutions, governments, media and civil society. These actors will continue to shine a spotlight where the industry refuses to do so.



RECOMMENDATIONS

Companies should:

- Adopt a policy commitment to human rights. This should include a specific commitment to upholding international standards on the protection of migrant workers.
- Conduct robust due diligence and monitoring to identify vulnerable workers and the risks they face, including through business relationships.
- Implement clear processes to protect migrant workers from exploitation, including urgent action to:
 - > Ensure workers retain sole custody of their passports
 - > Adopt the employer pays principle for recruitment throughout supply chains and engage in direct hiring of workers as far as possible
 - > Prevent worker deaths and publically report injuries and fatalities
 - > Guarantee the contract offered to workers in their countries of origin and prevent contract modification
 - > Ensure all workers are paid on time and in full, and enforce subcontractors' compliance with the wage protection system
- Ensure protection for workers throughout the supply chain: regulate relationships with suppliers and subcontractors through workers' rights-related clauses in bidding/prequalification documents and contracts.
- Enable meaningful worker participation, looking to worker-driven social responsibility approaches as an example.
- Establish grievance mechanisms in line with the UNGP's effectiveness criteria, designed with worker input and with robust protection from retaliation.
- Establish an industry group, with strong mechanisms for civil society input, to identify risk, share challenges and good practice, develop guidance and push for pre-competitive industry wide standards.

Governments and clients should strengthen the pre-competitive advantage and incentives for construction firms to take a responsible approach to the recruitment and employment of migrant workers e.g. through mandatory transparency and due diligence requirements as well as reforms to the tendering process.

Advisors, lawyers and consultants should promote a transparent and effective approach to the protection of migrant workers' rights.

Investors should reward companies that demonstrate transparency and due diligence.

Media, civil society and advocates should:

- focus attention on laggards and recognize the efforts of leaders to prevent and tackle migrant worker abuse.
- work to improve documentation of migrant worker abuse by construction companies, and highlight discrepancies between policy and practice.

COMPANY	RESPONSE	HQ	Human rights commitment	UN Global Compact
		Responders		
Aktor	Response	Greece	No	Yes
Al Futtaim Carillion	Response	UAE	Yes	No
Al Naboodah Construction Group	Response	UAE	No	No
Atkins (PMC)	Response	UK	Yes	No
Bechtel (PMC)	Response	USA	Yes	No
Besix	Response	Belgium	Yes	Yes
Bouygues	Response	France	Yes	Yes
Carillion	Response	UK	Yes	Yes
CH2M (PMC)	Response	USA	Yes	Yes
Hochtief	Response	Germany	Yes	Yes
Interserve	Response	UK	Yes	No
Laing O'Rourke	Response	UK	Yes	No
Multiplex	Response	Australia	Yes	No
Parsons (PMC)	Response	USA	Yes	No
QD-SBG Construction	Response	Qatar	No	No
Salini Impregilo	Response	Italy	Yes	Yes
SNC-Lavalin	Response	Canada	Yes	Yes
TAV Construction	Response	Turkey	No	No
TDIC (Developer)	Response	UAE	No	No
Van Oord	Response	Netherlands	No	No
Vinci	Response	France	Yes	Yes
Yapi Merkezi Insaat	Response	Turkey	No	No
		Preparing a response		
Alstom	Preparing a response	France	Yes	Yes
		Non-responders		
Acciona	Non-response	Spain	Yes	Yes
Actco General Contracting	Non-response	UAE	No	No
Al Ali Engineering	Non-response	Qatar	No	No
Al Balagh Trading & Contracting	Non-response	Qatar	No	No
Al Darwish Engineering	Non-response	Qatar	No	No
Al Habtoor Group (Developer)	Non-response	UAE	No	No
Al Jaber Group	Non-response	UAE	No	No
Al Mansouri 3B	Non-response	UAE	No	No
Al Shafar General Contracting	Non-response	UAE	No	No
ALEC	Non-response	UAE	No	No
Ali & Sons	Non-response	UAE	No	No
Arabian Construction Company	Non-response	Lebanon	No	No
Arabtec Construction	Non-response	UAE	No	No
Archirodon	Non-response	Greece	No	No
Balfour Beatty	Non-response	UK	Yes	No
Bam International	Non-response	Netherlands	Yes	No
Bin Omran Trading & Contracting	Non-response	Qatar	No	No
China Harbour Engineering Company	Non-response	China	No	No
China Railway 18th Bureau Group	Non-response	China	No	No
China State Construction Engineering Corporation	Non-response	China	No	No
Cimolai	Non-response	Italy	No	No
Cimolai Rimond	Non-response	Italy	No	No
Consolidated Contractors Company	Non-response	Greece	Yes	Yes
Constructora San Jose	Non-response	Spain	Yes	No
Daewoo Engineering & Construction	Non-response	South Korea	Yes	Yes
Dogus Insaat	Non-response	Turkey	No	Yes
Drake & Scull International	Non-response	UAE	No	No
Dubai Parks & Resorts (Developer)	Non-response	UAE	No	No
El Seif Engineering & Contracting	Non-response	Saudi Arabia	No	No
FCC	Non-response	Spain	Yes	Yes
Ferrovial	Non-response	Spain	Yes	Yes
Fujairah National Construction Company	Non-response	UAE	No	No
Galfar Al Misnad	Non-response	Qatar	No	No
GS Engineering & Construction	Non-response	South Korea	Yes	Yes
Gulermak	Non-response	Turkey	Yes	No
Habtoor Leighton Group	Non-response	UAE	No	No
HBK Contracting	Non-response	Qatar	No	No
Hyundai E&C	Non-response	South Korea	Yes	Yes
J&P Avax SA	Non-response	Greece	No	No
Joannou & Paraskevaides (Overseas)	Non-response	UK	No	Yes
Khansaheb	Non-response	UAE	No	No
Kier	Non-response	UK	Yes	No
Larsen & Toubro	Non-response	India	Yes	No
Lotte E&C	Non-response	South Korea	Yes*	No
Mace				
*NB: PMC	Non-response	UK	No	No
Medgulf	Non-response	Qatar	No	No
Meydan Sobha (Developer)	Non-response	UAE	No	No
Midmac	Non-response	Qatar	No	No
MS Construction	Non-response	UAE	No	No
NSCC International	Non-response	UAE	No	No
Obayashi	Non-response	Japan	Yes	Yes
Oger Abu Dhabi	Non-response	UAE	No	No
OHL	Non-response	Spain	Yes	Yes
Onur	Non-response	Turkey	No	No
Orascom	Non-response	Egypt	Yes	No
Petroserv	Non-response	Qatar	No	No
Pivot Engineering & General Contracting	Non-response	UAE	No	No
Porr	Non-response	Austria	Yes	No
Punj Lloyd	Non-response	India	No	No
Qatar Building Company	Non-response	Qatar	No	No
Redco International	Non-response	Qatar	No	No
Rizzani de Eccher	Non-response	Italy	No	No
Samsung C&T	Non-response	South Korea	No	No
Shapoorji Pallonji	Non-response	India	No	No
SK Engineering & Construction	Non-response	South Korea	Yes	Yes
Ssangyong Engineering and Construction	Non-response	South Korea	No	No
Starneth Engineering	Non-response	Netherlands	No	No
STFA	Non-response	Turkey	Yes	No
Taisei Corporation	Non-response	Japan	Yes	No
Tefken Construction	Non-response	Turkey	Yes	No
Teyseer Group	Non-response	Qatar	No	No
Tristar Engineering & Construction	Non-response	UAE	No	No
Trojan Holding	Non-response	UAE	No	No
United Engineering Construction	Non-response	UAE	No	No
Wade Adams	Non-response	UAE	No	No
WCT Holdings	Non-response	Malaysia	No	No
Yuksel	Non-response	Turkey	Yes	Yes
Key: * Commitment in sustainability report				

Annex 1

International standards

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ILO Core Conventions](#)
- [The Dhaka Principles for Migration with Dignity](#) (Institute of Human Rights and Business, 2016)

Guidance and resources

- Amnesty International, 2016, [The Ugly Side of the Beautiful Game: Exploitation of Migrant Workers on a Qatar 2022 World Cup Site.](#)
- BSR, 2016, [Addressing Workers' Rights in Engineering and Construction: Opportunities for Collaboration.](#)
- BWI, 2014, [Decent Work for Migrant Workers in Qatar: Role of Construction Companies.](#)
- CIOB, 2016, [Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains.](#)
- Engineers Against Poverty, 2014, [Improving Employment Standards in Construction in Qatar.](#)
- HRW, 2015, [Guidelines for a Better Construction Industry in the GCC: A Code of Conduct for Construction Companies.](#)
- ILO, 2016, [Ways Forward in Recruitment of Low-skilled Migrant Workers in the Asia-Arab States Corridor.](#)
- ITUC, 2015, [Frontlines Report 2015, Qatar: Profit and Loss – Counting the Cost of Modern Slavery in Qatar: What Price is Freedom?](#)
- LexisNexis, 2016, [Hidden in Plain Site: Modern Slavery in the Construction Industry.](#)
- Verité, 2016, [An Exploratory Study on the Role of Corruption in International Labor Migration.](#)

Business & Human Rights Resource Centre is an international NGO that tracks the human rights impacts (positive & negative) of over 6900 companies, making information available on its nine-language website.

We seek responses from companies when concerns are raised by civil society. The response rate is over 80% globally.

We encourage companies that have not yet completed our survey to submit a completed response. If any company would like to send us additional information, it is welcome to do so at any time.

For more information on our work on migrant rights in the Gulf contact the author of this briefing: Mariam Bhacker, Project Manager: bhacker@business-humanrights.org



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