

## **QUESTIONS FOR CONSTRUCTION COMPANIES REGARDING WORKING CONDITIONS IN QATAR**

- 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.

- [http://www.vinci.com/vinci.nsf/en/sustainable-development/pages/respecting\\_fundamental\\_human\\_rights.htm](http://www.vinci.com/vinci.nsf/en/sustainable-development/pages/respecting_fundamental_human_rights.htm)

### **OPERATIONS IN QATAR**

- 2. Scope:** Please describe the nature and scope of your company's operations in Qatar.

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 engages in construction, civil engineering, and contracting projects, along with providing associated services for both public and private purposes. As a non-exhaustive list, some ongoing projects include the New Orbital Highway (NOH), the Doha Metro Red Line South (RLS), and the first Qatari Lusail Railway Transportation system (LRT).

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

Total workers on site are 6,916. Out of that figure, 3,367 are QDVC workers, 2756 are sub-contractors, and 973 are other business partners.

- 4. Health and safety:** In direct operations and in contracts with sub-contractors:

- a) What is the company's approach to ensuring workers' health & safety in Qatar?

QDVC activities in Qatar are in line with the following laws, standards, and internal policies:

- Qatar Labour Law
- Qatar Construction Standards (QCS) 2014
- QHSAS 18001 Occupational Health and Safety
- Qatar Foundation Standards or any equivalent workers' welfare standards required by QDVC's clients for each project
- QDVC Management Policy
- QDVC Company Manual

Health and Safety are at the top of Vinci's set of priorities for each project. Our policy is well established in Vinci's Manifesto and Code of Conduct. One of the eight pillars of the manifesto is to strive for zero accidents. Vinci rejects the idea that workplace accidents are unavoidable. Vinci management holds the responsibility to do its utmost to ensure the physical integrity and the health of everyone on its worksites and in the facilities Vinci operates. Vinci fully commits itself to the zero accidents objective.

The main objective of the Group's health and safety policy are to anticipate and prevent occupational hazards, including psychosocial risks. It also consists in ensuring the quality of hygiene, health, safety, and quality of life in the workplace, and in redeploying employees who have suffered an occupational accident or illness. Vinci's health and safety policy is led by a coordination system that includes all of its H&S coordinators. This worldwide system brings together the health and safety managers in all the business lines. Its aim is to foster the sharing of best practices, improve the reliability of H&S indicators, and propose new ways of making progress in keeping with each business activity's specific situation.

In addition to our health and safety policy that is established in Vinci's Manifesto and Code of Conduct, strict health and safety clauses are a compulsory part of every contract, including those contracted out to other suppliers and sub-contractors. At QDVC, before each project commences, there is a two-day training / induction on health and safety measures – for operations and equipment-use on the construction site(s), in addition to other activities on the camp-site. All personnel and staff must attend a four hour Incident & Injury Free orientation session during the first month of their presence on site. Compulsory training sessions provide inexperienced workers with basic HSE skills such as risk awareness, working at heights, choosing appropriate Personal Protection Equipment, and waste management (such as "Green Helmet" or an equivalent procedure). Furthermore, there are safety forums with foreman, daily pre-start talks, and weekly "toolbox" talks that identify risks and corresponding mitigation measures. There are also specific safety training courses. These include Lifting Supervisor, Work at Height, MEWP Operator, and Scaffolding Erection & Inspection. There is also safety promotional work such as safety incentive awards.

Additionally, there is medical surveillance throughout the sites, which incorporates a medical fitness assessment, blood pressure and blood sugar monitoring, and first aid care. Medical training courses are also given, which cover heat stress awareness, Cardio-Pulmonary Resuscitation (CPR), basic life support, and first aid. Furthermore, there is a permanent campaign informing the risks of dehydration. Teams in the summer period are mobilised to constantly carry water on-site, and their working periods are also adjusted. There is on-site medical supervision, and the doctor stops work depending on certain temperature levels. Medical rescue drills are also conducted. Lastly, in terms of environmental monitoring, QDVC monitors water from dewatering systems and desalination plants. Internal and external sampling and analysis are performed. Workers' accommodation and welfare standards (including food and transport) must comply with either Qatar Foundation Standards or Supreme Committee Workers' Welfare Standards. The HSE department performs periodic labour camps inspections; found compliance failure results in relocation of workers in appropriate standard accommodation.

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

The Workers Committee sometimes covers issues regarding health and safety, such as heat stress prevention. Workers participate in meetings with the committee once every two months to voice concerns. There is also the Health Safety Environment (HSE) department that audits and reports periodically on the conditions.

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

All of the following figures (for accidents and fatalities) incorporate both QDVC *and* sub-contractor rates:

- In **2013**, the lost-time accident frequency rate\* was **0.87**, and the lost-time severity rate\* was **0.009**.
- 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**.
- There have been **two** work-related fatalities: one in **2009**, and the other this year in **2015**.

*\*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 due to work accidents x 1,000) / number of hours worked).*

**5. Conditions of employment: In direct operations and in contracts with sub-subcontractors, labour suppliers and joint ventures, please describe the company's policy and practice on:**

**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, therefore, the language used to describe terms of contract and employment to future workers are expressed both orally and in writing in the local tongue. Once the worker agrees to the terms, the recruiting agency and the newly hired worker both retain one copy of the same contract, with QDVC holding the original. The contract in the place of hire (which acts as a promise of terms) is identical to the one that will be signed in Qatar. When the worker has joined QDVC in Qatar, he signs the actual "Contract of Employment" that stipulates the as promised terms of remuneration, working conditions, and local working laws. Lastly, the Qatari Ministry of Labour attests all signed QDVC contracts. Workers receive their certified copy and QDVC retains the original.

**b) Timely payment of wages**

Wages are paid once a month in a personal bank account. They are always paid on time and in-full (including overtime, if exercised). QDVC has never experienced any issues in late or faulty payment of wages. Each worker has a debit card linked to his personnel bank account

**c) Issuing ID and health cards for workers**

QDVC issues local Qatari identity cards to all workers, which are obligatory if they want to leave the camp-sites. This offers all workers the liberty to move around the city and the rest of the country during their free time. Furthermore, all workers receive a health & insurance card that allows them to benefit from medical treatments in the Qatari public hospitals, and offers them free care in public establishments.

**d) Ensuring adequate worker accommodation**

For worker accommodations, QDVC abides by the suggested standards issued by the Qatar Foundation, Supreme Committee for Delivery and Legacy, and the internal Worker's Community. Accommodations and services available to the workers include their bedroom (that hold no more than four workers to a room, two workers for those who are at a junior staff level, and one person per room for those who are at a senior staff level), the canteen, medical services and quarantine (bed)room, a fitness centre, a multimedia room, a badminton court, some ping pong tables, billiards, a carrom table (a common Indian game), a basketball court, and a prayer room.

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

QDVC updated its procedure of storing passports. The old procedure, where workers still moved freely in his worker community, had a signature form for workers to sign, allowing the managers to properly safeguard workers'

passports from theft. Workers were able to recuperate their passport whenever they desired. Additionally, each had their local Qatari ID to freely travel around the country, as passports were unnecessary. With updated features in the living quarters, workers now have a personal safe in their own cabinet of their room to securely hold onto their passports and personal belongings.

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

When a worker wants to leave, the HR manager of QDVC conducts an exit interview, further understanding the worker's reason(s) in resigning. A letter is then officially signed by QDVC's head HR office, and it is forwarded to inform the concerned project. At that point, the project and payroll services provide the worker's last month's wages and settle any final payments. Also, QDVC takes care of all related travel charges if the worker resigns within his rotation. Finally, the Worker's Community alerts associated team members and QDVC's head HR office to prepare the exit permit. In the case of an emergency leave, the procedure is expedited. The management and the salary office validate the leave, and the project concerned is notified. The Worker's Community then prepares the exit permit with Human Resources and QDVC headquarters. Since January 2014, QDVC has reported that 75% of resignations are on the grounds of personal / family reasons.

QDVC delivers (NOC) "Non Objective Certificates" when workers want to move to another Company. Since 2014, 29 NOCs have been distributed.

**6. Recruitment agencies:**

**a) What process does the company go through to recruit migrant workers?**

There are several steps in the recruitment process. Firstly, there is a telephone exchange with the recruitment agencies – usually in several South East Asian countries from where QDVC hires. It is worth highlighting that each of these countries has a list of recruitment agencies that are allowed to recruit for foreign companies. QDVC has no choice but to choose agencies from within this list. QDVC cannot recruit directly, nor mission a recruitment agency external to the country. Following the first step, there is a video conference meeting between the agency and QDVC's head HR office. If this second step is a positive one, QDVC sends a team to these foreign offices to validate and certify the agency's legitimacy and key features (such as location, number of employers, and historical record). If the agency meets QDVC's standards, the two parties form and sign a service agreement, which clearly state the fees and division of tasks, along with QDVC requirements. Typically, QDVC representatives will travel to personally conduct interviews and engage in testing potential workers to fill various project vacancies. The team also uses this opportunity to make workers aware that QDVC fully pays the employment agency the agreed recruitment fees and that no other fees will be collected from the workers before or after they are mobilised to Qatar. During mass labour hiring activities, QDVC will also hold orientation meetings, giving information about the company, the working conditions, and labour laws in the state of Qatar. Both QDVC and local agency meetings are conducted in the local tongue, and are communicated both orally and in writing.

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

QDVC works with six different recruitment agencies dispersed among India, Bangladesh, Sri Lanka, and the Philippines.

**c) Does the company take steps to ensure that recruiting agencies it may deal 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?**

QDVC pays for ALL fees and travel costs. This is made explicitly clear with all parties – recruitment agencies and workers, directly. These terms are listed in the workers' preliminary employment offer, the actual contract of employment, and in the service agreement with the recruiting agency. Furthermore, both preliminary and actual contracts are submitted to the Qatari Ministry of Labour, showing workers' basic salary and benefits.

**d) Does the company have a policy on the indirect employment of workers by business partners?**

Vinci and QDVC have a Code of Conduct and a Sub-Contractor Relations Code. They require businesses and their activities to abide by the highest principles, which are equally stipulated in clauses of sub-contractor contracts. In addition to the standardised clauses, QDVC adds specific conditions with its sub-contractors to prevent any health and safety violations. Lastly, there is a defined process in selecting sub-contractors before an agreement commences, and the potential tender must meet QDVC's highest criteria before QDVC chooses to engage in business activities with them. In addition, QDVC HSE teams carry out sub-contractor inspections on their accommodations (through visits and interviews), strongly focusing on health and safety issues especially related to living conditions. These audits are followed by on-site action plans to improve these conditions.

## 7. Freedom of association:

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

VINCI's policy regarding dialogue between management and labour reflects its fundamental principles: recognising the role played by trade unions in the Group and the right of employees to belong to a union; achieving a constant balance between union involvement and close links with professional activities; facilitating communication and meetings between trade union representatives and employee representative bodies; ensuring that employee and trade union representatives are properly informed and trained by involving them in the Group's major initiatives (e.g. in the areas of health, safety, sustainable development, gender equality, and employing people with disabilities); and working to foster communication and collective bargaining worldwide. In this regard, dialogue between management and labour is confirmed as a key component to the success of the Group Manifesto and its commitments.

In countries that have not ratified the International Labour Organisation's conventions on trade union rights, VINCI companies are working to give employees the means of expressing themselves. VINCI companies observe the laws and regulations of the countries in which they do business. Operational managers are assisted by human resources managers, who propose the most appropriate solutions that comply with local requirements and VINCI's commitments in observing trade union freedoms.

- b) How does the 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 is a Qatari company and respects local Qatari laws; nevertheless, QDVC has an effective Worker's Committee. This committee meets with the workers, HR department, managers, and QDVC executives in order to properly communicate the current situations and needs of the workers. The meetings with the workers are conducted every two months, and are organised as an open-forum. Some topics covered by the Committee include the organisation of the Committee, its role, and resources; health and safety, with a focus on heat stress prevention and summer work organisation; salaries, bonuses, and leaves; and recruitment. Also, VINCI has begun first discussions with BWI (Building and Wood Workers' International). In January 2015, VINCI invited a delegation of trade union representatives to Qatar consisting of an official of BWI, two employee Board members, and the Secretary General of VINCI'S European Works Council.

## 8. Grievance / remedy:

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

In Qatar, QDVC's Worker's Committee opens the grievance mechanism channel to its workers. Here, workers can raise concerns on vast topics, such as living conditions, wages, health and safety.

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

During induction once in Qatar, workers are informed about the Worker's Committee and ways in which they may utilise it. Additionally, there are community boards sharing the organisation's updates and general information. A handbook of rights for QDVC workers is under final translations for workers' languages.

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

The periodic meetings held within the Committee of workers act as a protected free-forum, where workers are free to safely express any issues or concerns. The Committee acts as an impartial body, safeguarding workers against retaliation.

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

Anything discussed during these forums or any concerns the Committee finds, itself, during meetings are immediately brought to the attention of the appropriate QDVC managers, and followed through with action. In addition to this process, QDVC runs periodic audits and inspections related to health and safety issues that are relayed to management for remediation. Furthermore, both at Vinci corporate level and at QDVC level, there is a designated Group Ethics Advisor. This contact is the reference person for any issues related to ethics or business conduct, and any discussion will be held in full confidentiality, as listed on Vinci's site. Vinci's Group Ethics Advisor is Jean-François Gouedard, and QDVC's Ethics Advisor is Olivier Sulik.

## 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, implementing, and maintaining compliance with policies and procedures related to worker welfare in Qatar. Subsequently, several QDVC departments (HR, HSE, CSR) 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.**

Ferial Bouchaib, Head of Communications, QDVC

Xavier Planchon, Deputy Director in charge of Human Resources, QDVC

Stéphanie Malek, Director of Communications, VCGP

Jean-François Gouedard, Group Ethics Advisor, Vinci

Sarah Tesei, Director of Social Innovation, Vinci

## 10. Engagement with Qatari government:

- a) **Does the company engage the Qatari government to encourage enforcement of the labour law in areas such as passport and fee retention?**

Since 2007, VINCI and QDVC representatives have held high level meetings with Qatari labour representatives. Discussions are run with French representatives (such as the French Ambassador) on Qatar's current labour climate. In addition, VINCI organized a visit to Qatar with the participation of trade union representatives, consisting of an official from BWI, two employee Board members 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. The former QDVC HR Director is now a member of the Supreme Committee.

While staying in line with Qatari law, QDVC also has its own policy of not retaining any passports or fees; furthermore, there is utter freedom of movement for all of its employees. Fee retention is an issue that also needs to be raised in the workers' home countries.

- b) **Has the company raised concerns with the government about elements of the "kafala" sponsorship system that restrict workers' ability to change jobs or leave the country?**

QDVC applies Qatari law throughout all its operations. QDVC distributes (NOC) "No Objective Certificates" when the worker requests to leave. QDVC has raised issues linked to employment practices with the Qatari government. QDVC's policy relating to workers wanting to exit the country or change jobs is also discussed in question 5(f). Also, QDVC regularly participates and shares its workers' welfare practices during construction and CSR events organised in Qatar.

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

A challenge QDVC faces is the difficulty of increasing the standards of every actor in the supply chain. Also 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. Lastly, the poor control from third countries' government upon the whole chain of recruitment within their own country is also a real challenge for companies who want to implement an ethical process of recruitment.