**EXPO 2020 DUBAI RESPONSE TO EQUIDEM**

1. **Is the worker welfare department aware of any of the cases or any similar experiences of other workers employed by the companies mentioned in this letter? If so, what steps have been taken to address the exploitation documented?**

Expo 2020 Dubai takes worker welfare extremely seriously. We employ a 12-strong Worker Welfare Team which is made up of global and regional experts in their field, supported by advice from world-class partners such as specialist risk consultancy Control Risks and PWC.

With regards to the specific allegations you have contacted us about, we would clarify that Expo only works directly with Al Naboodah and Transguard; while JML is employed as a subcontractor for a number of our main contractors.

Our Worker Welfare Assurance Standards, which are bound into every contract, set down both UAE law and requirements formulated from International best practice as required by Expo 2020. Of the additional standards required by Expo, half relate to employment practices, and the other half to workers’ accommodation and transportation. For example, contractors are required to provide increased space for accommodation and enhanced recreation facilities.  We work very closely with all of our partners and stakeholders to make sure our worker welfare infrastructure remains best-in-class.

Every contractor working on our site is bound by contract to comply with our Assurance Standards, including our Policy on recruitment fees. In line with International Labour Organisation (ILO) guidance, our Policy and Assurance Standards both clearly state employers must ensure the free and fair recruitment of workers. That means all recruitment costs – including visas, airline tickets, and any other administrative costs – must be covered by employers without exception, and absolutely no fees should be paid by workers. If, during our monitoring, we discover fees have been paid, workers have been reimbursed.

The entire Expo 2020 team delivering the design and construction are committed to our policy and Assurance standards from pre-qualification stage through to completion of the work on site. We have a Worker Welfare Centre of excellence which ensures that our wider Expo 2020 team and our contractors, along with our third-party developers, are committed to and comply with our Policy and assurance standards. Our Centre of Excellence team draws on expertise from internationally renowned specialists including the UK Government’s Health and Safety Executive (HSE), our Project Management Consultant, risk specialists Control Risks and the financial audit firm PwC, who conduct financial audits related to employment practices.

In addition, we are heavily supported by UAE government bodies such as Dubai Police, Dubai Civil Defence, Dubai Municipality and the Ministry of Human Resources and Emiratisation to coordinate on inspections and make sure we are constantly improving. The authorities also support us in any relevant intervention relevant to their scope of jurisdiction.

We continually review our Assurance Standards to make sure our worker welfare infrastructure remains best-in-class.

Everyone involved with Expo 2020 is committed to our HSE and Worker Welfare strategy including worker welfare monitors appointed by our third-party developers, participants and main contractors. Over 300 people have been trained by the Expo 2020 centre of excellence worker welfare team to carryout regular and effective audits on aspiring and incumbent contractors.

1. **Is the department aware of any similar experiences of other workers on Expo 2020 Dubai sites or other relevant projects?**

When a worker arrives on the Expo site from their home country, they undergo an induction programme that educates them about their rights both in the UAE, and according to Expo standards. If a particularly complicated issue is raised, we hold face-to-face interviews with workers to properly investigate, and we take responsibility for storing these records securely.

A number of issues of non-compliance have been identified, as is typical of a project of this vast scale and complexity. That’s why we have put such a rigorous, world class monitoring system in place to make sure we stay on top of issues as they arise and remedy them immediately.  We share and discuss our monitoring issue tracker openly in our Expo-led Worker Welfare Forums. These take place every two months with compulsory attendance and presentations from all of our main contractors.

Issues identified during monitoring can vary from poor air conditioning in buses to too few first aiders in accommodation facilities.  Some cases have been identified where accommodation facilities have been found to not be in line with UAE legal requirements. In such cases we work with a contractor to move workers to adequate accommodation facilities.

1. **What measures has the department taken to protect worker wages and benefits from the financial impacts of the COVID-19 impact?**

We have several grievance mechanisms in place to support those working on the Expo 2020 site. These were established long before Covid-19 hit.

At each stage of the workers’ journey with Expo 2020 Dubai we help them understand their work-related rights, as well as access to Expo-owned support mechanisms, through inductions, videos, poster campaigns and training in their native languages.

All our contractors are obliged to hold regular Worker Welfare Committees with worker-elected representatives, during which members can raise issues and concerns. These must be held at a minimum of every two months. In 2018 we rolled out the Expo 2020 Worker Hotline – a free phone number available to all those working on the Expo 2020 site in eight languages, triaged by experienced call handlers. We have also launched Worker Connect, an app containing information on legal rights that all workers can access from their mobile phones. They can also use it to confidentially report grievances. In addition, we conduct regular face-to-face and unannounced interviews with workers on the ground on a confidential basis.

The two most regularly raised topics of concern are around wage payments and food, and we’ve work directly with contractors to remedy both immediately.

1. **Have any businesses been penalised for failing to adhere to guidelines to prevent COVID-19 infection? If so, how many companies and company staff have been penalised and what types of penalties have been handed out?**

Contractors that refuse to comply with our Assurance Standards are no longer eligible to win work with or carry out work for Expo 2020 and those that have outstanding non-compliances have pecuniary measures taken against them either at tender stage or during their work on site and matters may be escalated to the UAE authorities if necessary.

At the beginning of Covid-19, Expo 2020 led a series of communications and wellbeing sessions with Expo 2020 contractors, third-party contractors, subcontractors and service providers. Details of these sessions can be found on the Covid section on our [website](https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprotect-eu.mimecast.com%2Fs%2Fd-qyC60OnUNgEt9F7jI%3Fdomain%3Dexpo2020dubai.com&data=04%7C01%7Cdmoore%40hanovercomms.com%7Cd89887dc2f7e44f8c30008d8b09a823f%7C76cfb400ab12485f8c0cdca5fe3c2fdd%7C0%7C0%7C637453525006659356%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=095pSjd51LzfITNNxEz1KElbu%2FH6NPBGDcK5V%2FZxkx8%3D&reserved=0).

We have not had to penalise anyone for non-adherence to these Covid guidelines because we have found companies have followed them.

1. **Any other information that you think is relevant to the cases and situations we have documented or the assessments that have been included with this letter.**

Expo 2020 has a publicly declared commitment to Worker Welfare, which can be found on our [website](https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprotect-eu.mimecast.com%2Fs%2FRRLkC7APoHg0vukBBjZ%3Fdomain%3Dexpo2020dubai.com&data=04%7C01%7Cdmoore%40hanovercomms.com%7Cd89887dc2f7e44f8c30008d8b09a823f%7C76cfb400ab12485f8c0cdca5fe3c2fdd%7C0%7C0%7C637453525006659356%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=436WX5otQUKkxJ4PBsCs4NbRPtIPOKVRmLyqL6zThd8%3D&reserved=0).

We thank you for raising these concerns with us. If the workers would permit you to share their details with us, we will investigate their claims in detail and we commit to rectifying any issues in line with our Worker Welfare policy detailed in this email.

They also have the option of getting in touch via our Worker Hotline or through our Worker Connect app (also detailed above).

We contacted Al Naboodah, Transguard and JML for their input before replying to you. All three companies reiterated their commitment to the Expo Worker Welfare policy, their willingness to cooperate with your investigation should you choose to contact them directly, and to address any situations that they are made aware of.

If you need contact details for the relevant person at any of these companies, we would be happy to provide them.

Expo 2020 Dubai has acted responsibly to meet the challenge of COVID-19. The health, safety and wellbeing of everyone working at Expo 2020 remains our number one priority. When Covid hit, we introduced a number of precautionary measures in line with guidance from the UAE Ministry of Health and Prevention and Dubai Health Authority (DHA), and the latest information and advice from the World Health Organisation.

Amongst others, these measures included:

* Expo 2020 invested in three world-class medical and COVID-19 testing facilities onsite. Operated by the DHA and open 24/7, they are staffed by a team of doctors, nurses and trained volunteers, including Expo and non-Expo staff. In accordance with DHA regulations, the facilities undergo full sanitisation twice a day.

* All 62 workers over the age of 60 were placed in isolation in a hotel where they received regular check-ups by the DHA. All accommodation and meal costs are covered by Expo. An HR representative regularly visited them to explain the measures to the workers in their mother tongue, and to reassure them that their jobs, and salary, were secure.

* In April, Expo 2020 opened a dedicated testing facility for workers over the age of 50 with existing medical conditions onsite.

* Expo 2020 has worked with Dubai Health Authority to develop guidelines to reduce risk at every stage in the journey from a worker’s accommodation, to the site and safe return to the accommodation.

* Across all accommodation sites, Expo 2020 mandated an increase in the frequency of cleaning and sanitisation processes of all facilities and surfaces. Individual rooms have been provided to vulnerable workers, where possible. Isolation rooms for quarantining workers are mandatory in all group labour accommodation. There have also been special representatives assigned to handle workers with suspected COVID-19 symptoms.