

2018 Questions for Construction Companies in Qatar
Migrant Worker Rights

Name of company: Interserve

Headquarters address: Interserve House, Ruscombe Park, Twyford

Website: <https://www.interserve.com/>

1)

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

Interserve has associate construction companies which operate in Qatar, all of which are governed by the high quality, health, safety and sustainability standards we have set ourselves, including labour rights and employee welfare.

Gulf Contracting Company is one of Qatar's foremost construction companies, offering general contracting together with a range of specialist services including prefabrication, interior fit-out and joinery.

How United Services has a reputation for quality and expertise operating across the spectrum of building services within a construction environment.

Madina Group is a leading provider of specialist services in the oil, gas and petrochemicals field and is highly effective in mechanical engineering, fabrication and safety consultancy.

In addition to the high standards which we have set ourselves, our projects are also governed by standards set by our blue chip clients, Qatar Foundation, Qatar Supreme Committee and the Qatar Labour Law.

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

The business relationships in our associate businesses are extensive, many of which we consider to be commercially sensitive. We don't maintain this information publicly, however we would be happy to discuss specifics in further detail.

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

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

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

Our direct employee numbers in Qatar are currently 7,021 – with 55% originating from India, 19% Bangladesh and 16% Nepal.

- b) Workers employed by subcontractors on your current projects

A further 1,226 subcontractor employees are currently working on our projects in Qatar.

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

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

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

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

1,182 labour supply company employees are currently working on our projects in Qatar.

Human rights policy & due diligence

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

We operate a number of policies to ensure human rights are respected, including our Human Rights Policy - which include the rights of our employees and those employed by our subcontractors, labour supply companies and other entities in our subcontracting chain. Our policies are publicly available and can be accessed through the below link:

<https://www.interserve.com/about-us/policies>

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

- a) How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?
- b) Do you enforce compliance beyond the first-tier of your contracting chain? What challenges does the company face in ensuring subcontractor compliance, both in the first and subsequent tiers?

We expect our subcontractors and other entities in our contracting chain in Qatar to comply with our human rights policies and procedures. We drive compliance and performance improvement through a range of mechanisms – these extend to including clauses relating to human rights in our contracts, to questions on human rights (and an assessment of responses provided) in our subcontractor pre-qualification questionnaire, to audits of their facilities and processes.

Our experience has shown that training our subcontractors in our requirements is an important step to achieving compliance and we have held a number of supply chain engagement sessions in this regard.

We typically only subcontract to one tier, however where there are subsequent tiers we require that our subcontractors implement due diligence procedures to ensure that their supply chain are compliant.

Recruitment

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

We typically recruit new employees through audited and subsequently approved recruitment agencies in the countries from which we recruit from. We will also direct hire for a small number of positions. We will send recruitment agencies our requirements in advance and then follow up with face to face interviews at the locations of potential candidates.

- 6) Does your company have a publicly-available written policy to respect migrant workers' rights that addresses the specific risks migrant workers face during recruitment? Please provide links or attachments to the company's relevant policies.
- a) How does your company prevent the practice of contract substitution? Does your company have a policy of honouring the terms of contract signed in workers' home countries?
 - b) If your company has a policy of no-fee recruitment, what steps does it take to ensure workers do not pay recruitment fees and related costs?
 - c) If your company has a policy of reimbursing fees, please describe the company's process for identifying incidences of worker-paid fees and reimbursing fees to workers.
 - d) How do these policies apply to the recruitment agents you engage and to labour suppliers and subcontractors who have workers on your projects?

Whilst we don't have a policy that addresses the specific risks migrant workers may face during recruitment, we believe the principles are inherent in our Human Rights Policy, which is supported by processes and procedures in our management systems to ensure these risks are addressed.

We ensure that contracts for new employees are signed by both the employee and our business in the country of recruitment to ensure contract substitution is avoided. On arrival in Qatar, we ensure that the terms of the contract are honoured, and this is then attested by the department of labour.

We operate a policy of no-fee recruitment. Steps taken to ensure employees don't pay recruitment fees include reference to this in employees' contracts and through the recruitment process, explaining clearly to them that they are not to pay any recruitment fees.

This policy applies to our recruitment agents and if they are found to be charging recruitment fees, we shall terminate working with them. We expect our subcontractors and labour suppliers to implement similar recruitment procedures and conduct both audits and worker engagements to validate their recruitment and employment practices.

Payment & wages

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

We benchmark wages of our employees in Qatar against our competitors and pay in line with market rates. We comply with the Qatar set minimum wage and abide by the Qatar Wage Protection System (WPS), which monitors that we are paying employees as per their agreed labour contracts.

- 8) Does your company operate on a contractual "pay when paid" basis in relation to:
- a) Subcontractors?
 - b) Employee wages?
 - c) Other creditors? Please specify.

We ensure that our employees are paid on time in line with their contract and Qatar Labour Law and undertake both audits and worker engagements to check that our subcontractors and labour supply companies do the same for their employees.

We don't operate on a 'pay when paid' basis and will pay our subcontractors in line with our contract with them as construction of a project progresses.

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

The Qatar Wage Protection System (WPS) is used by the Qatari Government to detect unpaid wages and check that companies are complying. In addition to our audits and worker engagements, we use the WPS to ensure that our subcontractors and labour supply companies don't default on paying wages by obtaining copies of their WPS statements.

We have found the introduction of the WPS to be particularly effective and haven't experienced any instances of a direct employer defaulting to pay wages or having gone into liquidation.

Freedom of movement

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

Employees have the right to retain their passports and identity documents, however we will often store these for our employees for safe keeping and ensure that this is in a fire proof place. In these cases, employees have free access to collect their documents as and when required. We also expect that our subcontractors and labour supply companies allow their employees to access their passports and identity documents readily and are undertaking both audits and worker engagements in this regard.

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

We obtain work permits and other documents required for employment for our own employees and maintain these as part of our human resources processes to ensure their validity. We pay for the work permits for our employees. Furthermore, we obtain copies of the work permits for those employed by our subcontractors and labour supply companies working on our projects and it is expected that their employer pays for these.

The penalties for failing to issue or renew work permits are high, and as a result this is not considered to be an issue.

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

Our employees are free to change jobs and we will issue exit permits to leave Qatar as and when required by employees. We expect our subcontractors and labour supply companies to adopt the same approach and undertake both audits and worker engagements in this regard.

Living conditions

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

We are committed to providing consistent high standards of accommodation facilities for our employees and ensure that safe and decent accommodation is provided for those working in our supply chain through the implementation of our worker welfare procedure.

We undertake employee accommodation audits on our own facilities, those of our subcontractors and our labour supply companies to ensure suitable accommodation is provided and drive continuous improvement. In 2018 to date, our own facilities have achieved an average score of 88% and the facilities of our supply chain have achieved an average score of 71% in Qatar.

Over the last year, we have introduced areas of critical failure to our employee accommodation inspection report template for which a fail under any of these areas would mean the employee accommodation fails. In these cases, immediate action is likely to be required and is reported to the General Manager of our business. Where critical failures occur, or a low score is achieved, meaning that employers are failing to house their employees in adequate living conditions, the steps we take may include requiring immediate rectification of issues identified, housing their employees in our accommodation or termination of our contract with them.

Our emphasis however, is typically, on working with our supply chain to improve, who by enlarge are receptive to recommendations for improvement we make. Following audits, corrective actions are agreed and resolved through follow up communications and inspection visits if required within timescales agreed.

This approach is complimented by additional management information obtained via other mechanisms such as our subcontractor prequalification process, our worker engagement process and welfare committees.

We are also audited by our clients on a regular basis who have set high standards, whose requirements we comply with.

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

- a) safe and adequate nutrition

We provide catered accommodation with menu options (including a diabetic kitchen) for different nationalities and employ a nutritionist to ensure healthy meal choices are offered.

Our Gulf Contracting business was the first construction company in Qatar to achieve the food safety standard, ISO 22000 demonstrating our commitment to providing safe and healthy food.

We also conduct education programmes on the importance of nutrition and having a balanced diet for our employees.

b) Healthcare

We employ company doctors, provide health clinics and health consultation services at our employee accommodation facilities and ensure all employees have access to healthcare arrangements in Qatar.

c) banking and remittance services

We provide bank cards to our employees and ensure they have access to banking facilities. We offer mobile banking services at our employee accommodation facilities, which are also typically located close to money exchange facilities.

We provide computer rooms and free Wi-Fi in our employee accommodation facilities, so residents are also able to access online banking.

d) transportation

We provide bus transportation for our employees to go places, for example at the weekend or on their days off.

e) leisure activities

We provide a range of leisure activities at our employee accommodation facilities – including gyms, entertainment rooms and access to sports pitches, for example, for cricket or football matches.

As part of our work welfare procedure, we seek to ensure that employees in our supply chain also have access to such services / facilities.

Health and safety

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

We are committed to developing a proactive health and safety culture across the full range of our activities and aim to ensure that none of our employees, contractors, or the people who interface with our operations, become injured or are made unwell by the way we carry out our work.

The Managing Director for our Engineering and Construction business, Andy Beaney, is appointed as the Interserve International Board member responsible for health and safety across the region and is supported by dedicated health and safety professionals in each of our businesses to drive continual improvement throughout our health and safety frameworks.

Our health and safety management systems are accredited to ISO 45001, which is the newly updated international standard for occupational health and safety management, by approved external third parties. These systems are specific to each businesses' operational risk profile but share a common set of minimum standards under the global 'One Interserve' approach towards health and safety.

Our 'Aim to be Incident Free' campaign, is one of our behavioural change programmes aimed at changing attitudes towards safety. This is supported by local campaigns such as 'Make Safety Personal' and 'Behavioural Safety Centres' in our businesses in Qatar, which apply to both

directly employed and subcontracted employees on our projects. Everyone working on our projects receives a site safety induction and over the last year our Mobile Safety Training Unit has continued to provide training to more than 100 employees everyday.

Furthermore, our Reward & Recognition programme has continued to go from strength to strength whereby awards are made to highlight achievements and celebrate individuals and teams, who are most effectively embedding health and safety, sustainability principles and our values into their day to day operations.

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

- What the maximum/limit is on the amount of overtime
- Whether overtime work is voluntary
- What the premium is for overtime work
- How the company prevents all workers on its projects from exceeding overtime limits during peaks in construction activity

Our policy on overtime is implemented in line with Qatar Labour Law. Overtime work is voluntary and is set at a maximum of 2 hours extra per day. Overtime work is typically paid at a premium rate of 1.5 times of an employees' base salary. Through our project time and attendance systems, we are able to ensure that those working on our projects don't exceed overtime limits.

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

Our Project Management Plans set out steps to protect employees from high temperatures, humidity and sunlight throughout the year including monitoring humidity and heat indexes, ensuring adequate hydration, ensuring adequate breaks, implementing job rotation and providing shade where possible.

We believe the onset of high temperatures and humidity during the summer months requires particular focus, where as a result we operate summer working hours and each location develops a summer working plan. These detail changes to shift patterns, including no outside work taking place between 11.30am and 3pm. Specific measures are communicated to employees via daily briefings, supplemented by training and toolbox talks on topics such as heat stress. In addition, cool areas and rehydration drinks are provided for employees during break times along with the provision of endothermic cooling vests to prevent the onset of heat stress related cardiac arrest.

18) Does your company maintain public data on fatalities and injuries to workers on its projects? If yes, please provide a link or attachment with the data. If not, please provide information for 2016 and 2017 on the total number and the causes of:

- a) Work-place fatalities in your direct and subcontracted workforce
- b) Permanent disabilities in your direct and subcontracted workforce
- c) Lost-time injuries in your direct and subcontracted workforce ⁴

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

The table below shows the number of work place fatalities, permanent disabilities and lost time injuries which occurred in our businesses in Qatar in 2016 and 2017.

	Company					
	Gulf Contracting		How United Services		Madina Group	
	2016	2017	2016	2017	2016	2017
Fatalities	1	0	0	0	0	0
Permanent Disability	0	0	0	0	0	0
Lost Time Injuries	9	6	1	1	1	0
Total Man Hours	48,327,444	26,136,797	3,524,309	2,530,340	7,140,662	4,560,091

The performance of our businesses and sites is continuously monitored, with detailed monthly health and safety reports produced for review by our Interserve International Board. With regret, our Gulf Contracting business had a fatality of a subcontractor employee in 2016, which was caused by his limited compliance with the safe working procedure. Detailed recommended corrective and preventative actions have been developed and implemented as a result of this incident.

The main causes of our Lost Time Injuries have been due to hand and finger injuries in the line of fire, improper manual handling and slips, trips and falls. In all cases, an accident investigation is undertaken and remedial actions implemented. Furthermore, our Behavioural Safety Centres reinforced through visible felt leadership have been established to further reduce such injuries.

Representation and remedy

- 19) Given legal restrictions on freedom of association and membership of trade unions in Qatar, how does your company ensure workers' voices are represented and heard by the company, e.g. through worker-representative committees? Please describe the mechanism in place.

We operate a number of committees in our businesses in Qatar such as on-site health and safety committees and employee welfare committees at our accommodation facilities which provide employees with the opportunity to raise any concerns and suggest improvements. We also undertake employee engagement surveys.

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

We have a Grievance Procedure and a Whistleblowing Policy, as part of which mechanisms and communication channels have been established for both direct and subcontracted employees on our projects to report concerns and seek advice. In addition to this, we ensure access to employee welfare officers, which combined with our worker engagement process provides further opportunities for any concerns to be raised.

Our 'Business Practices – Conducting Business with Interserve' Policy sets out the behaviour that is expected of both our employees and our business partners. Our values (Everyone has a voice, Take pride in what you do, Do the right thing and Bring better to life) underpin this and are a critical code of behaviour for us.

As part of our Whistleblowing Policy, if requested all reasonable steps are taken to protect anonymity and any act of retaliation against a whistle-blowing employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

All grievances reported are investigated, with the individual being advised of the results of the investigation as well as any corrective action being taken.

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

No grievances were raised by directly employed or subcontracted employees on our projects in Qatar in 2017.

Other information

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