

2018 Questions for Construction Companies in the UAE *Migrant Worker Rights*

Name of company: BESIX Group SA

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Preliminary comment: BESIX Group entered the Gulf market via its regional company Six Construct in 1965. The BESIX Group development is consequently largely channeled through Six Construct and the answers on following questions focus on Six Construct and its subsidiaries in UAE.

We endeavored to fairly reply to the questions hereunder, it being understood that our responses are subjected, where applicable to our CSR reports. Those are indeed submitted to a well monitored issuance and control process and objectively report our effective achievements including on the Human Rights.

1)

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

Six Construct is a multi-services company that operates in the construction of commercial and residential buildings, sport and leisure facilities, infrastructure and marine-related projects. BESIX Group currently employs 7,795 staff members (of which +5,680 blue collars) in UAE, and a total of +15,400 staff members worldwide.

Below is the list of our main current Projects in UAE:

- The Royal Atlantis (Dubai)
- Expo Dubai 2020 event infrastructure
- Jebel Ali Sewage Treatment Plant – Phase 2 (Dubai)
- Masdar Institute Neighborhood (Abu Dhabi)
- Dubai Reverse Osmose Seawater Treatment Plant (Dubai)
- Dubai Deep Storm water Tunnel (Dubai)
- Dubai Waste to Energy (Dubai)
- Shindagha Bridge (Dubai)
- Raft of The Tower (Dubai)
- Yas Theme Park (Abu Dhabi)
- Mina Khalid Port – New Berth at Breakwater Reclamation Area (Sharjah)

On all Projects, the Group applies its own Welfare Minimum Standards which takes the applicable local laws and standards as a minimum. However, the following two Projects are governed specifically by project specific welfare standards as follows:

- Yas Theme : Fair Labour Standards introduced by Warner Bros and developed by Control Risks

- Expo Dubai 2020: Worker Welfare introduced by Expo 2020 and prepared by Bureau Expo Dubai 2020

We are getting audited on regular basis by the above committees and are found to be compliant with the mentioned standards.

- 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.

Name of the Project	Area	Client / Engineer	Engineer	Partner (if any)	Link
Yas Theme Park	Abu Dhabi	Miral	Louis Berger	Nil	www.besix.com www.sixconstruct.com
The Royal Atlantis	Dubai	Atlantis The Palm 2 LLC.	Faithful & Gould	SsangYong	
Deep Water Storm Tunnel	Dubai	Dubai Municipality	STANTEC	PORR	
Expo Dubai 2020	Dubai	Expo Dubai 2020 LLC	Mace / Parsons	ORASCOM	
Jebel Ali Reverse Osmose Seawater Treatment Plant	Dubai	Dubai Electricity & Water Authority (DEWA)	ILF Consulting Engineers	Acciona Agua S.A.	
Waste to Energy Project	Dubai	Dubai Municipality	Fichtner Consulting Engineers	Hitachi Zosen Inova	
Shindagha Bridge	Dubai	Road & Transport Authority RTA Dubai	Parsons	Nil	
Raft of The Tower	Dubai	Emaar Properties	Parsons	Nil	
Mina Khalid Port – New Berth at Breakwater Reclamation Area	Sharjah	Government of Sharjah – Sharjah Ports Authority	CH2M	Nil	
Jebel Ali Sewage Treatment Plant – Phase 2	Dubai	Dubai Municipality	AECOM	Larsen & Toubro, Dubai	
Masdar Institute Neighborhood	Abu Dhabi	Mubadala Development Co	Hill Int.	Nil	

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

- 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: +7,900 people from 60 different nationalities
- b) Workers employed by subcontractors on your current projects: +4,670
- c) Workers employed by labour supply companies on your current projects: +710 workers

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.

BESIX Group recognizes and safeguards the employment and human rights of all its employees under all applicable laws to eventually maintain their wellbeing.

In 2014, we upgraded our Code of Conduct which embodies Corporate Governance, Human Rights, Business Behavior, Safety, Environment and Human Resources accordingly. We issued a Sustainable and Responsible Procurement Code of Conduct in 2013. BESIX Group expects all stakeholders of the procurement chain, being the Group's own buyers and all subcontractors, suppliers and service-providers, to contribute to the continuous alignment of the BESIX Group procurement chain with the Universal Declaration of Human Rights, the International Labor Organization Conventions 29 and 87, 98, 100, 105, 111, 135, 138, 155 and 182, the ISO 9001 and 14001 standards and with the Guidance Principles of ISO 26000.

These Codes constitute a framework that can be further developed by each Group company to the extent necessary to align with the specificities of the concerned country or business sector, subject to the condition that the Group company is required to apply the high standards prevailing in such country or business at all times.

In 2016, BESIX Group joined the Global Compact initiative of the United Nations and its adherence has been reconfirmed by the United Nations in September 2017. The Group commit to continuously contribute to the improvement of its actions on Human Rights.

In that respect, BESIX Group signed an International Framework Agreement on Fair Labour Standards with Building & Wood Workers' International (BWI) and the European Works Council (EWC) of BESIX Group in 2017. This worldwide agreement's purpose is to promote and protect the well-being of all employees and workers employed by BESIX Group. It applies to all BESIX Group entities worldwide, as well as to all of its subcontractors and suppliers, a provision which was already contained in the BESIX Group Code of Conduct. It firmly illustrates the Group's interest for fair labour standards of its employees and workers regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion, political opinion or beliefs. The agreement is based on a wide range of international labour standards such as the ILO Fundamental Conventions and other human rights instruments such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, and the ILO fundamental rights at work Declaration.

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

And in 2018, BESIX Group initiated a Guide on Worker Welfare. We have defined a set of 10 wellbeing rules, also anchored in internationally recognized standards. These principles shall be embraced from management to staff members, their representatives, unions and health and safety representatives. This guide is about promoting and protecting all our employees and workers worldwide.

- 4) Does your company require subcontractors and other entities in your contracting chain in the UAE 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.)?

We issued the Guide on Worker Welfare to the main subcontractors, for awareness and compliance, in the Middle East. Once the scope and contract is awarded to a subcontractor he will be asked to comply with our minimum standards based on the Guide. This will be used as a model during the contractual period to enforce the local labour laws of the country, as a minimum, and ensures that it is followed and managed on site. It also aims to protect the health, safety, welfare, security, rights and the dignity of each worker on site. In the Middle East, specific efforts are accordingly deployed in terms of auditing, monitoring, conducting training and full induction for awareness and conversely, applying certain penalties for those who fail to adhere to the contractual obligations and mandatory worker welfare standards. The related strategies are set to help and assist the subcontractors with appropriate measures that are taken to ensure the organizations in the supply chain hold an equal honor.

BESIX Group requires, as it does in its Sustainable and Responsible Procurement Code of Conduct, subcontractors and suppliers to follow applicable local legislation, the requirements of the tenders and international labor standards on social security, work-related well-being, safety and workplace organization as a minimum requirement.

Subcontractors and suppliers are compelled to sign and apply our Sustainable Procurement Code of Conduct.

Inspections are organized to detect potential issues regarding our subcontractors. If irregularities are observed, we act upon them and stress our subcontractors to apply the commonly agreed action. If not, we end our collaboration as we already did for some of them in the past.

They are also invited to follow training sessions organized by the Health and Safety site teams, and also to participate to the Group Worldwide Safety Time Out which occurs once a year. This event is held on all projects and in all offices of BESIX Group. The Group staff and subcontractors staff took part in interactive reflection together and shared ideas for making their workplaces safer and more environmentally friendly.

- 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?

In line with our Sustainable and Responsible Procurement Code of Conduct, all signing subcontractors acknowledge the rights of BESIX Group to audit compliance and to take appropriate correcting majors including terminating the subcontracts.

Similar reference and rights are made in the BESIX Group general conditions of procurement and subcontracting.

With the latest issuance of the Guide on Worker Welfare in the Middle East early 2018, BESIX Group aims to support compliance beyond the first-tier of our contracting chain. Main subcontractors and suppliers

as well as their supply chains are expected to comply with the Worker Welfare guide and commit to improve their standards, as required, to become fully compliant in an agreed timeframe.

For that, we will engage a more systematic “review compliance process” of said Worker Welfare minimum assurance for the subcontractors and suppliers in order to adapt and take corrective actions on their supply chain.

Proactively working with those in the supply chain aspires them to meet the planned objectives. This is by establishing clear and attainable standards that are understood and communicated. We also ensure complete transparency and outward reporting.

We insist on the fact that our subcontractors shall comply with the relevant Codes and regulations developed here above; a non-compliance resulting in termination of business collaboration. We insist, especially in terms of Health and Safety, that they apply the highest standards, even for third parties who would be involved, directly or indirectly.

Even though this firm obligation for our subcontractors and suppliers, considering how to enforce compliance in the subsequent tiers is part of our challenges. In case of doubt, the Group shall at any time be authorized to assess and audit the subcontractors or suppliers in the implementation of and compliance with our Codes of Conduct and all International or local Human Rights instruments to which we comply with.

Our three CSR reports witness more specifically on the above details.

Recruitment

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

Our entire recruitment process is documented and transparent. Migrant workers are recruited through local agencies in India, Nepal, Philippines, Bangladesh, etc.

We ensure through our policies and procedures that our workers are recruited under the ‘employer pays’ principle and we disengage from any recruitment agency or outsourcing company that doesn’t support this principle. Agencies are notably compelled to sign our Sustainable and Responsible Procurement Code of Conduct.

We work to prevent migrant workers paying fees associated with their recruitment by monitoring the recruitment process in the country of origin and by contracting only with a select number of overseas recruitment agencies who meet our commitments.

Prior to joining our team, all workers receive a contract written and explained in a language they understand. Employees can access their employment documents at any time.

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.

As per our recruitment policy article B-iv (of Six Construct in the UAE), and in order to address the risks migrants workers face during recruitment, a team of minimum three of our Senior and reliable employees

are sent personally to do the selection of the candidates and report any doubt of non-adherences to the agreed process that can eventually cause a deviation from the main objective and principle which is to recruit employees on an ethical, fair, and transparent manner.

- 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?

Again, as per our recruitment policy, the team we talked about, explains the selected candidates about the nature of their future job as well as the terms and conditions. They also clearly communicate the wages to the selected candidates and obtain their acceptance in their own language before the departure from their home country or before the commencement of work if recruited in the country of assignment.

We further developed a form whereby all candidates sign it at their country of origin as well as after arrival at the country of assignment confirming that they have been explained about the terms and conditions of their employment contracts and salaries and that what they have been offered in their home country is the same of what they received after arrival in the country of assignment.

- 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?

We work to prevent migrant workers paying fees associated with their recruitment by monitoring the recruitment process in the country of origin and by contracting only with a select number of overseas recruitment agencies who meet our commitments.

We contractually ensure that recruitment agencies are prohibited from collecting recruitment fees and they are screened for compliance at the time of selection and continually assessed and monitored throughout the contract duration. The agencies must have a wide net of offices across all the country, this is to avoid misleading and corruption of sub-agencies. They are also requested to demonstrate their method of sourcing and testing the workers in order to ensure that there is no chance of abuse during any stage of the recruitment process. It starts from the advertisement for "free of charge recruitment", display a toll free number for complains till the delivery of the employment visa.

- 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.

As mentioned above, we follow the "employer pays" principle in which workers will not bear any of the costs associated with their recruitment. After arrival of the employees in the country of assignment a dedicated HR Officer meets them to explain about their work nature and location, asks if they paid any fees during their recruitment process, obtain their signature on the form mentioned in the above point. If any candidate claims that he paid recruitment fees, we reimburse the amount directly to him and contact the agency who recruited him for investigation and apply the relevant contract clauses which can lead to the termination of their contract.

- d) How do these policies apply to the recruitment agents you engage and to labour suppliers and subcontractors who have workers on your projects?

We work with recruitment agencies that we carefully selected. They shall meet our commitments and also understand, sign and apply our Sustainable and Responsible Procurement Code of Conduct.

In case of doubt, an audit is organized and if irregularities are observed, collaboration is ended.

Payment & wages

- 7) What is your company's process for determining the wages of its workers in the UAE, 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.

Wages and benefits are paid to our workers on time and in line with their employment contracts, complying with applicable legislation and collective agreements.

We are concerned and regularly verify the wages of its employees in order to make sure that they can afford fair living standards in the country of assignment. This is being reviewed based on candidates/employee's profile, experience and competencies, education, credentials/certificates that are required for the position. Salaries are benchmarked through the current available market trend and our recruitment partners.

- 8) Does your company operate on a contractual "pay when paid" basis in relation to:
- a) Subcontractors? Yes, we operate on back to back basis with the Sub-Contractors
 - b) Employee wages?
 - c) Other creditors? Please specify. Nothing specific

Our Company does not operate on a contractual "pay when paid" basis in relation to the employee wages.

Wages and benefits are paid to our workers on time on a monthly basis and in line with their employment contracts, complying with applicable legislation and collective agreements.

All workers are provided with clear information about their wages and benefits, specifically through their monthly pay slips.

- 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.

Our dedicated Welfare Team conducts random various interviews with the workers of the subcontractors to make sure, among various matters, that they all received their salaries and on time. The subcontractors are also requested during the audits we conduct in their offices, to provide reports from the "Wages Protection System" showing the timely payment of salaries.

Our audit focuses on timely payment, any unjust deductions or discrepancies. If it is found that a subcontractor or a supplier has failed to pay his employees for any reason, he is officially advised to make the payment without any delay otherwise, we try to reach an agreement with him to make the payment using their outstanding payables with us.

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?

The Company does not keep or retain the passports or any other identity documents of its employees except if it is required for visa processing. This allows them free movement, including exit visa for as long no legal rules prohibit this in case of governmental or judicial actions. All employees have the freedom of movement outside their normal working hours in line with applicable laws. While at work, employees are required to follow the Company's rules and procedures.

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 have a dedicated Document Management team who is responsible to process all new/renewal residence & work permits for all employees. All employment-related document for migrant workers' employed, including right to legal or company benefits, are issued either in a language they understand, or translated to them in writing or interpreted verbally in case this is prohibited by local legislation. All workers employed receive access to these documents whenever they want or require them.

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

We prohibit any kind of forced employment, if an employee resigns, we give him all the necessary documents to be able to obtain a new work permit with another employer but within the legal time frame which is one month after the cancellation. Otherwise, the employee must exit the country and will be able re-enter because the type of the cancellation we do is normal. The Group policies and procedures ensure that employed workers are recruited under the principle of free of debt and can disengage from any recruitment agency or outsourcing company that doesn't provide the necessary proof of non-discrimination and non-debt recruitment practices.

We prevent migrant workers to be liable for the recruitment fee, transport and visa procedure, or any relevant other costs for the procedure of recruitment in its country of origin.

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.

The necessary procedures and audits are put in place to review the accommodation facilities of workers in the employer's premises or premises rented and setting up in orders to subcontractors, audit and control procedures of their accommodation facilities.

The Company pays medical expenses and provides first aid facility as mentioned by the Law. Besides the company provides recreational facilities, catering, shops with local products within the staff

accommodation, bus shuttle from staff accommodation to center town (if site is far from a city), housekeeping and laundry service and providing sport room, free wifi. We installed air conditioning facilities in workers' accommodation as early as the 1990s.

The Company makes the necessary arrangements for its workforce to perform traditional ceremonies (Indian New Year, Blessing of the Tools, ...)

We organize training programs (mandatory and voluntary) to help our workers to acquire the skills required for their job, to enhance their health and safety knowledge and also to give them the possibility to develop their career path. The Company, together with [BESIX Foundation](#), pursues its [Right2Learn](#) program which concerns Information Technology. Thanks to basics, workers can use a computer (Internet and emails included) which support their wider skills development and avoid expensive international phone calls. English class rooms are also available in various places to improve their communication skills.

These accommodations are inspected by the safety department few times a year regarding the local legislation and international accepted standards. These inspections mainly focus on the safety of employees, fire protection system, employee welfare facilities, health & hygiene, emergency procedures, maintenance etc.

A report of inspection is made and includes the recommended actions to resolve any problems or shortcoming discovered during the inspection and distributed to the employee accommodation management for necessary action within reasonable acceptable delays. Any condition that may result in imminent danger shall be corrected immediately. Fire drills & fire extinguisher training were conducted in employee accommodations as part of emergency response training.

In case those detected non-conformities persist, we end any contract with accommodation facilities providers, subcontractor and informing local legislator of the case at hand for subsequent protectionary measures and legal follow-up.

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

a) Safe and adequate nutrition

We made a contract with a food catering company specialized in nutrition and healthy way of cooking. This is in order to provide healthy food rich with the necessary proteins and vitamins to all our employees.

b) Healthcare

All employees are enrolled in a health insurance scheme which is also in line with the UAE Labour Law and regulations. When required, occupational health exams and certificates are obtained for all employees. Medical insurance coverage is provided and the insurance cards are given to all workers. The validity of the health insurance coverage is ensured throughout the whole period of employment. When an employee is on sick leave, he receives the salary as per the UAE Labour Law.

c) Banking and remittance services

We made an agreement with Mint, it is a money transfer Company approved by the Central Bank for the salary transfer and banking of the employees.

d) Transportation

Workers accommodation is located approximately 30 to 45 minutes from the work place and all vehicles providing transportation have an air-conditioning and seat belts. On weekly basis employees are transported to the market and shopping malls to buy their provisions. Busses are also provided for religious purposes on the weekends.

e) Leisure activities

TVs are provided with free satellite at workers accommodation. Subscriptions for various TV channels are in place and are renewed on annual basis, it is available for free to the workers. Gym and recreational areas are available in the camps for various sport activities. Sport tournaments are organized periodically, T-shirts, juices and trophies are awarded to the winners. Free WIFI is available 24/7 in the workers accommodation for use by the employees so they can access social media to contact their families and friends back home. Company gatherings, dinners or lunches for all workers are organized from time to time.

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.

It is BESIX Group's commitment to provide safe and healthy working conditions for all employees and all other third parties associated with or affected by our activities. The duties and obligations imposed by relevant applicable laws and local regulations are fully complied with and will be considered to be the minimum standard to which BESIX will measure its responsibilities.

Specific Occupational Health & Safety Plans are developed for each Project. They detail the necessary health and safety good practices in all activities, and the particulars to the concerned project. Project Management teams ensure that adequate and appropriate resources, training, communication and consultation are planned and provided. Performance is periodically monitored and measured against objectives set and published during the Management Review Meeting. Compliance with the requirements of the BESIX Group's Occupational Health and Safety Management System are subject to regular internal and external audits, and results are reported to the Senior Management.

The Company is also committed to reduce as much as practically possible the impact of its activities on the surrounding Environment and to monitor that impact. The HSE control measures are part of any operation and consequently it is integrated in the normal course of work under the lead and accountability of the operational supervision line management.

BESIX Group's policy describes the commitment of the Management in providing safe and healthy working conditions for all employees and the subcontractors working in our projects. The HSE aspirational goals are set to obtain no accidents, no harm to people and no damage to the local and global environment. BESIX is committed to effectively manage HSE matters as an integral part of their business.

Working together with subcontractors, BESIX is committed to achieve the highest standards of HSE through:

- Incorporating HSE considerations in planning/development stages, services and processes.
- Complying with all applicable directives, laws, regulations and codes of practice which are considered to be the minimum standards to follow. If such standards do not exist, then Contractor's HSE Program shall apply.
- Aiming to introduce improved processes to continually improve HSE performance.
- Providing sufficient information, training and supervision to enable employees and others under Company and Contractor influence to minimise impact on the environment and to contribute positively to their own health and safety and protection of the environment.
- Ensuring that supervisor, foremen, workers and subcontractor operate and maintain an HSE management system that meets requirements
- Ensuring that the permit issuer and permit coordinator provide that every permit to work are release and after must be monitored the expiring date frequently.
- No permit – No work policy would be maintained at all time.
- Establishing safe and ergonomically sound systems of working and a healthy working environment in the office and on construction sites for all staff.
- Benefiting the health of employees in the home office and in the field through appropriate programmes.

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

All work is voluntary and workers work standard 8 hours per day, up to a maximum of 48 hours per week, and a minimum of a one-day weekly rest period (on Friday). Hours of work comply with appropriate national legislation, national agreements and industry standards.

The Company will not demand that overtime hours are worked. Under special working regimes and periods of extreme crisis, for which the company will document how the period of rest is complied with, overtime is voluntary and is remunerated in full, in compliance with all applicable laws.

During Ramadan, we reduce working times by two hours, without any salary reduction.

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.

In order to ensure that workers are safe whilst doing their work during peak summer period (15 June to 15 September), the following procedure are implemented in all the BESIX projects:

- A system of monitoring temperature and humidity with associated records are established, using a Thermo Hygrometer.
- Heat stress risk assessments are prepared by the Safety Inspector/ Officer.
- All heat stress precautions are checked daily using daily Heat Stress Prevention Check List
- Medical screening for all workers working outdoor will be performed by the first aider
- Workers are provided with heat stress training, daily tool box talks about awareness of heat stress management.
- Adequate signage's, posters related to heat stress, symptoms, precautions and control measures are displayed at workplace in various languages to be known by the majority of workforce.
- Toolbox training are provided for all work on the importance of keeping hydrated and recognizing signs and symptoms of heat related illness.
- Cool potable water supplies are supplied in 'Igloos'.
- Cooling Towels are provided to all workers during the summer
- A water flask of at least 1 litre capacity is provided to each worker so that the water is cool.
- Air conditioned rooms are provided to each construction area.
- First aid equipment and sufficient cooling packs are made available.
- Emergency arrangements related to the Heat Stress conditions and associated training and emergency drills are provided to educate the workers to keep themselves hydrated.
- First Aiders are trained on heat stress management and emergency response.
- A work/rest schedule is implemented along with cool area for physical activity during high temperatures.
- Reduce the physical demands of work, reduce work time, and rotate more Workers on the job.
- Regular short rest breaks in shaded rest areas are provided
- Rotating personnel from hot areas to cooler areas are advised and monitored
- Complete more physically demanding work in the coolest part of the day, preferably in night shift or early morning.

- 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:
- Work-place fatalities in your direct and subcontracted workforce
 - Permanent disabilities in your direct and subcontracted workforce
 - Lost-time injuries in your direct and subcontracted workforce ⁴

BESIX Group reports these statistics at Group level in its annual activity reports which are published [on its website](#). Six Construct reports 1 workplace fatality in its direct and subcontracted workforce in 2016, not in 2017. There were no permanent disabilities in its direct and subcontracted workforce. The company reports 5 lost-time injuries in its direct and subcontracted workforce respectively in 2016 and 2017.

The Group has carefully analyzed all details of any accident which may occur in order to prevent accidents like these from ever happening again.

Representation and remedy

- 19) Given legal restrictions on freedom of association and membership of trade unions in the UAE, 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.

In order to have the communication between the workers and the Management in two ways of direction, the Company facilitated the selection of workers' representatives in a transparent way. The candidates proposed themselves voluntarily and the selection process was successful.

The representatives are indeed the voice of the workers and can raise their concerns to the Management directly through monthly meetings and by contacting the Welfare Officers at any time.

The concerns vary between accommodations, food, health, salary discrepancy, and so on.

All workers are free to select a representative to discuss welfare issues on their behalf. Workers' representatives will not be discriminated against and will be given full support in their role. The Company helps its workers to elect their own representatives in various locations.

- 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.

The Company developed a grievance & procedures policy in order to ensure that all employees with a grievance relating to their employment, work, working and/or living conditions, relations with colleagues, relations with their supervisors and wish to talk about it with the Management, can follow certain procedures starting from informal to formal resolution as per detailed process mentioned in the said

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)

Policy. The aim is to resolve the grievances as quickly and as fairly as possible before it is developed into major difficulties for all concerned.

BESIX Group's management reinforced the importance of working and contributing to a respectful cooperation on the workplace by launching a Respect campaign in 2013. 'Respect' was also added as a core value. Respect is so much more than just complying with the local regulations of most of the countries to prevent burn-outs or behaviors like harassment. It is the attitude between human beings in their daily professional life.

To make this value living and to maintain a positive spirit within the Group, an internal role of Confidence Officer has been set up within each Group companies.

Forming a real network of Confidence Officers, nominated employees act as facilitators - or discrete mediators, as the case may be – whose intermediary role is aimed at safeguarding and improving the well-being of our colleagues and giving them the tools and confidence they need to go beyond professional challenges, grow as individuals, and realize their personal ambitions.

The Group CSR Officer supplements the organisation in charge of each discipline to provide assistance and be consulted in case of doubt or application difficulty. Our Codes further prescribe that violation of laws, rules, regulations or the Code shall be reported to the Group CSR Officer while being treated confidentially.

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.

In 2017 we had only one grievance related to food matter and it was closed. Grievance report attached for the past few years.

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 the UAE, including any challenges it faces in doing so?

The Group's CSR challenges and achievements are available in our CSR reports including on all and each of our replies under questions 20 and 21 here above. Our [2015-2016 CSR report](#) sets out our performance in main CSR sections. We have defined our KPIs for each objectives in consideration with our stakeholders, from our staff members-colleagues to our partners, our subcontractors suppliers, and also citizens and our planet.

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