

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

Name of company: Multiplex

Headquarters address: Dubai

Website: <https://www.multiplex.global/>

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.

Multiplex is a leading international construction contractor, employing over 3,750 people across our operations in the Middle East with head offices in Dubai and Abu Dhabi in the United Arab Emirates. We have been shaping the skyline and delivering high quality infrastructure assets across the Middle East for 20 years, designing and constructing some of the most challenging construction projects in the region. We take immense pride in being part of the incredible growth and development of this evolving region.

The way the built environment is designed and developed shapes the way we live, move and work. We are committed to developing policies, business practices and services that drive positive change and shape our future. Multiplex is committed to the highest standards of ethical behaviour and social responsibility, and to ensuring that our business and relationships are based on integrity – one of our core values.

We acknowledge that regional businesses, such as Multiplex Middle East, are subject to specific local complexities and dynamics, and we have therefore designed and developed a bespoke Welfare Management System (WMS). The WMS consists of structured policies, principles, procedures, processes, responsibilities and accountabilities, all based on the 'Plan-Do-Check-Act' cycle from the ISO management standards. To meet the commitments outlined within our Multiplex Middle East Welfare Policy Statement and our Welfare Principles, Multiplex Middle East has collaborated with a reputable and internationally-recognised consultant to develop a bespoke and user-friendly system. The WMS has been designed to improve the conditions of migrant construction workers by ensuring alignment with relevant and applicable legislation, best practices, and international standards and frameworks including:

- UN Guiding Principles on Business and Human Rights
- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises
- Institute for Human Rights and Business's Dhaka Principles
- Relevant International Labour Organization (ILO) Conventions
- Modern Slavery Act UK (2015)
- Applicable Laws

Since its inception, the Multiplex Welfare Management System has been actively implemented across five live projects in Dubai and Abu Dhabi. Additionally, in 2017, a peer review was performed on our WMS by a third-party human rights consultant to ensure alignment with international frameworks and

facilitate continual improvement. Due to the confidentiality clauses governing these projects, we are unable to disclose specific details.

- 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.

At Multiplex, we work with a variety of business entities and recognise the importance of our supply chain in assisting with the development and construction of the some of the region’s most intricate and iconic buildings. Multiplex has a large and complex supply chain, which is both extensive and global. It is comprised of consultants, subcontractors and suppliers, delivering materials, equipment and services. Our approach is founded on strong supplier engagement (from pre-tender to construction), implementing appropriate due diligence measures, stringent contractual controls, and operational monitoring to mitigate and manage worker welfare risks. This is complemented by a Supply Chain Guidebook, issued at tender stage, that details all Multiplex requirements in relation to worker welfare. Our Supply Chain Guidebook on worker welfare has been reviewed by an external human rights consultant and their recommendations have been incorporated where appropriate. Due to the confidentiality agreements in place, we are unable to disclose the specific names and details of projects, partners, entities or similar.

- 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

Country of origin	Number of directly employed workers
Nepal	150
India	2,399
Bangladesh	0
Pakistan	3
Sri Lankan	1

The total number of workers directly employed by Multiplex in the UAE currently stands at 2,553

- b) Workers employed by subcontractors on your current projects

The total number of workers employed by Multiplex’s subcontractors in the UAE currently stands at 4,911

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

The total number of workers employed by Multiplex's labour suppliers in the UAE currently stands at 2,996

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.

Multiplex is committed to the welfare of its employees, contractors, subcontractors and suppliers. We treat everyone with dignity and respect, provide an ethical and safe working environment, and recognise everybody's rights and entitlements. We have a number of policies in place that promote the highest standards of ethical behaviour and social responsibility. In 2017, we reviewed and amended our policies where required to ensure continual improvement.

The Multiplex policies that promote the rights and welfare of workers include:

- **Anti-Slavery and Human Trafficking Policy** – This sets our commitment to combatting all forms of modern slavery and human trafficking within our business and supply chain
- **Anti-Slavery and Human Trafficking Charter for Suppliers and Service Providers** – This sets out the requirements for our suppliers and service providers
- **Multiplex Middle East Welfare Policy Statement** – This captures specific regional and contextual factors that are applicable across our Middle Eastern supply chain
- **Multiplex Middle East Welfare Principles** – Eight high-level principles that serve as Multiplex's standards and capture key areas of worker vulnerability from recruitment to repatriation
- **Building Responsibly Worker Welfare Principles** – Multiplex is a founding member of Building Responsibly and co-authored the Building Responsibly Worker Welfare Principles, a global initiative to create an international standard on worker welfare for the engineering and construction industry
- **Multiplex Middle East Health and Safety Policy**
- **Code of Business Conduct and Ethics**
- **Ethics Hotline Policy**
- **Anti-Bribery and Corruption Policy**

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?

Yes.

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.)?

Multiplex adopts a multi-faceted approach to managing subcontractors and related entities by:

- Embedding contractual controls at the procurement phase
- Undertaking pre-engagement due diligence

- Conducting and implementing 'risk based' operational monitoring of subcontractors during the cycle of the project
- Implementing continual capacity building and training across our value chain, with formal training material developed to capture workers, suppliers and subcontractors management

Multiplex has adopted anti-slavery and human trafficking provisions in our contractual agreements with subcontractors, suppliers and recruitment agents, and we require them to comply with our Anti-Slavery and Human Trafficking Policy & Supply Chain Charter, Welfare Policy Statement and Welfare Principles. To complement these efforts we also issue a Supply Chain Welfare Guidebook at the procurement phase, which informs our supply chain of how to conduct business in a way that complies with our Welfare Principles.

To provide assurance that the Multiplex Welfare Policy and Welfare Principles are being adhered to, we have incorporated an auditing regime of subcontractors and recruitment agents into the Operational Monitoring component of our Welfare Management System. The frequency of audits on subcontractors and/or recruitment agents is dependent on the risk rating determined during the procurement due diligence phase, and/or at the discretion of senior management in the event that a grievance has been raised.

- 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?](#)

Yes. Multiplex agreements are typically back-to-back in nature, hence Multiplex's requirements are imposed upon our subcontractors and their supply chain. We work very closely with all entities, subcontractors and suppliers operating on our sites and projects, taking responsibility as a principal contractor to implement our Welfare Management System downstream as far as reasonably practicable. We recognise the challenges faced in managing worker welfare risks beyond the first tier in our contracting chain, particularly regarding entities with which Multiplex has no contractual relationship (typically smaller suppliers and manpower companies). To achieve this, Multiplex adopts a 'risk based' approach that does not differentiate between the types of entities, to which purpose an auditing regime of subcontractors and recruitment agents has been incorporated into the Operational Monitoring component of our Welfare Management System. The frequency of audits on subcontractors and/or recruitment agents is dependent on the risk rating determined during the procurement due diligence process, and/or at the discretion of Senior Management in the event that a grievance has been raised. This is supported by KPI and trend analysis that supports more informed management decisions to minimise risks and address emerging concerns.

Additionally, all workers are trained in the WMS and grievance mechanisms prior to entering site during the safety induction. This means that regardless of which company the worker is from, every worker onsite is trained and made aware of the welfare grievance mechanisms available to them. Furthermore, a member of the Welfare Team attends all inductions to offer advice, support and guidance. This is supported by capacity building workshops for the senior management of key subcontractors across our projects. Training is an essential constituent of Multiplex's approach, used to encourage engagement and deliver lasting, long-term results.

Recruitment

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

As a part of Multiplex's Welfare Management System, Welfare Principle 4 – Recruitment Practices, pertains to responsible recruitment practices, ensuring that recruitment is 'ethical, legal and without discrimination.' To meet this commitment, Multiplex's Welfare Management System outlines several mechanisms, one of which requires prospective recruitment agencies to undergo a rigorous pre-qualification exercise before their final selection. Only reputable agents are chosen at the due diligence phase, supported by capacity-building training, with in-country checks, surveys, candidate training and grievance mechanisms throughout. This effectively reduces potential risks and abuses surrounding recruitment and employment.

This exercise is conducted in three stages. Firstly, the recruitment agency is advised about the purpose of the due diligence process and is requested to complete a pre-qualification questionnaire. This requires them to compile particular information relating to their recruitment practices, including their organisational background, governance practices and code of conduct, use of labour agents and brokers in recruitment, and their policies regarding child labour, forced labour and anti-bribery and corruption. The information provided is extensively reviewed and evaluated by the Welfare Team, who use a scoring method to 'risk assess' the agent. The findings of the questionnaire are complemented with several rounds of meetings with the agent and further 'requests for information.' Should the agency pass this, they will be awarded a contract to recruit for Multiplex.

During the second stage, following contract award and prior to the recruitment drive, all selected recruitment agencies undergo a robust induction and training programme on Multiplex's Welfare Principles and detailed expectations on responsible recruitment.

Thirdly, a member of Multiplex's Welfare Team attends the recruitment drive to verify the initial findings of the questionnaire and to review the processes and procedures of the recruitment agency. This is further supported by conducting random and anonymous interviews with the applicant's in-country.

Where Multiplex employs direct labour, only legal, reputable and ethical recruitment agencies are used. We work directly with recruitment agencies in each country of hire where the terms and conditions are communicated to the employees in the local language via an induction and a letter. Multiplex management staff and a member of the Welfare Team are always present during these inductions to respond to any queries that may arise. Since the inception of the system, three recruitment drives have been conducted.

We adhere stringently to the UAE labour law in all our human resource operations, relating to recruitment, residency sponsorship, termination, resignation, visa, wage payment etc. Furthermore, Multiplex Welfare Principle 1 – Employment Standards mandates that all employees receive all benefits to which they are entitled, prior to employment, during employment and at the end of their contract. This covers the full cycle of deployment and safe return to origin countries. Multiplex Welfare Principle 1 ensures that all employees:

- Are under the sponsorship of Multiplex, applicable to the location they are working
- Are able to move companies/countries without obstacles or retaliation
- Are able to return to their country of origin without obstacles or retaliation

- Have the correct documents to live and work legally

This is reinforced by Multiplex Welfare Principle 4 – Recruitment Practices, which mandates that employees should have the means to formally agree their role and salary prior to joining a company in a language they understand, as confirmed in the recruitment process by Multiplex management. It is further reinforced by Multiplex Welfare Principle 6 – Education and Training, which ensures that employees are educated about their rights and entitlements.

To ensure these measures are upheld, the Welfare Team conducts regular internal audits and spot checks and informs HR of their findings to promote continual improvement. In 2017, two internal audits relating to labour recruitment were conducted by the Welfare Team.

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.

Yes. Multiplex is committed to the 'Employer Pays' Principle which is captured by Multiplex's Welfare Policy Statement and supporting Welfare Principles (please refer to Appendices 1&2). Most notably, Welfare Principle 4 – Recruitment Practices mandates that employees should have the means to formally agree their role and salary prior to joining a company in a language that they understand, as confirmed in the recruitment process by Multiplex management. Multiplex Welfare Principle 6 – Education and Training also ensures that employees are educated about their rights and entitlements. These Principles are supported by a management framework dedicated to labour recruitment. Please refer to our response to question 6 b) for further details as to how the policy is implemented.

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?

Where Multiplex employs direct labour, only legal, reputable and ethical recruitment agencies are used. We work directly with recruitment agencies in each country of hire where the terms and conditions are communicated to the employees in the local language via an induction and a letter. Multiplex management staff and a dedicated member from the Welfare Team are always present during these inductions to respond to any queries that may arise.

Within our Welfare Management System, Multiplex Welfare Principle 1 – Employment Standards mandates that employees receive valid and legally compliant employment contracts in a language that they understand. This is reinforced further by Multiplex Welfare Principle 4 – Recruitment Practices, which mandates that employees should have the means to formally agree their role and salary prior to joining a company in a language that they understand as confirmed in the recruitment process by Multiplex management; and by Multiplex Welfare Principle 6 – Education and Training to ensure that employees are educated about their rights and entitlements.

To provide assurance that the Multiplex Welfare Policy and Principles are being adhered to, an auditing regime of subcontractors and recruitment agents has been incorporated into the Operational Monitoring component of our Welfare Management System. The frequency of audits on subcontractors and/or recruitment agents is dependent on the risk rating determined during the procurement due diligence process and/or at the discretion of Senior Management in the event that a grievance has been raised.

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?

As a part of Multiplex's Welfare Management System, Welfare Principle 4 – Recruitment Practices, pertains to responsible recruitment practices, ensuring that recruitment is 'ethical, legal and without discrimination'; endorsing the 'employer-pays' principle. In order to meet this commitment, Multiplex's Welfare Management System outlines several mechanisms, one of which requires prospective recruitment agencies to undergo a rigorous pre-qualification exercise before their final selection. Only reputable agents are chosen at the due diligence phase, supported by capacity building training; in-country checks, surveys, candidate training and grievance mechanisms throughout; effectively reducing potential risks and abuses around recruitment and employment.

The following process has been adopted to support the implementation of the Multiplex Welfare Policy Statement and Welfare Principles:

Phase 1: Pre-recruitment:

- Strong contractual clauses in recruitment agent contracts; linking payment terms to performance on delivering zero-fee recruitment
- Formal due diligence and pre-screening of recruitment agents. During this stage, the recruitment agency is advised about the purpose of the due diligence process and requested to complete a pre-qualification questionnaire. This requires them to compile particular information relating to their recruitment practices, including their organisational background, governance practices and code of conduct, use of labour agents and brokers in recruitment, child labour, forced labour and anti-bribery and corruption policies. The information provided is extensively reviewed and evaluated by the Welfare Team, who then uses a scoring method to 'risk assess' the agent. The findings of the questionnaire are complemented with several rounds of meetings with the agent and further 'requests for information'. Should the agency pass this, the agent will be awarded a contract to recruit for Multiplex.
- Conducting recruitment agent 'training and awareness' workshops, upskilling agents on zero-fee recruitment, as well as clearly relaying Multiplex's expectations and our Welfare Policy and Welfare Principles

Phase 2: During the recruitment drive (if external):

- All marketing material is pre-vetted by the Welfare Team to ensure that zero-fee recruitment is advertised.
- Multiplex's Welfare Principle 4 – Recruitment Practices, mandates that employees should have the means to formally agree their role and salary prior to joining a company in a language that they understand. Pre-departure inductions are conducted in the origin country by a member of the Welfare Team and the terms and conditions are communicated to the employees in their local language via an induction and a letter. These inductions also include information on Multiplex's operations, contextual details, rights and responsibilities, living and working conditions, and safety information.
- The Welfare Team conducts random interviews, surveys and focus groups to ensure that no fees are charged.
- Recruitment agency spot checks and surveillance is also done by the Welfare Team, providing oversight of all actions by the agent.
- Biometric scanning and formal trade testing.

Phase 3: Applicant selection:

- Once the applicants are selected, Multiplex’s HR team works directly with the agents to ensure that all visa, medical and other legal documents are completed. We adhere stringently to the UAE labour law in all its human resource operations, relating to recruitment, residency sponsorship, termination, resignation, visa, wage payment etc. To further, Multiplex Welfare Principle 1 – which mandates that all employees should receive all benefits to which they are entitled to, prior to employment, during employment and at the end of their contract; covering the full cycle of deployment and safe return to origin countries. This principle ensures that all employees:
 - Are under sponsorship of Multiplex, applicable to the location they are working;
 - Able to move companies/countries without obstacles or retaliation;
 - Are able to depart to their country of origin without obstacles or retaliation; and
 - Have the correct documents to live and work legally.

Phase 4: Applicant arrival:

- In accordance with Multiplex Welfare Principle 6 – Education and Training, all employees are educated about their rights and entitlements and are given an arrival induction
- Further trade training is provided
- A salary advance is given

Phase 5: Monitoring and Assurance:

- Grievance mechanisms are available throughout all phases, and include confidential and anonymous surveys, focus groups and interviews. A member of the Welfare Team is always present across all recruitment drives to implement our grievance mechanisms.
- Multiplex’s payment terms have been drafted to ensure that if any grievances are uncovered, payment terms are staggered over six months, so that the recruitment agent is accountable for any cases of fees charged during the probationary period where the worker is reimbursed. The recruitment agency’s payment terms and performance are directly linked to their ability to deliver upon ethical recruitment.
- This is complemented with interviews that are conducted at the site level by a member of the Welfare Team to further check that fees have not been charged.

To ensure that these measures are upheld, the Welfare Team conducts regular internal audits and spot checks and informs HR of their findings to promote continual improvement.

- 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.](#)

Multiplex conducts worker interviews, surveys, representative committee meetings, and focus groups. We also have drop boxes at all accommodation facilities to help identify incidences of worker paid fees. Additionally, at the recruitment phase in the country of origin, prior to departure, the phone number of a member of the Welfare Team is given to all applicants. This ensures applicants have access to advice and can raise a confidential and anonymous grievance. All grievances raised are investigated by the Welfare Team, tracked and acted upon within a timely manner. Grievance mechanisms are available throughout all phases, and include confidential and anonymous surveys, focus groups and interviews. A member of the Welfare Team is always present across all recruitment drives implementing the grievance mechanisms. This is complemented with interviews that are conducted at the site level by a member of the welfare team to further check that fees have not been charged.

Multiplex's payment terms have been drafted to ensure that if any grievances are uncovered, payment terms are staggered over 6 months, so that the recruitment agent is accountable for any cases of fees charged during the probationary period; where the worker is reimbursed. The recruitment agency's payment terms and performance are directly linked to their ability to deliver upon ethical recruitment.

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

Multiplex agreements with subcontractors include clauses that reference the Welfare Policy and Welfare Principles, which means Multiplex's requirements are imposed upon our subcontractors and their supply chain. Multiplex works very closely with all entities, subcontractors and suppliers operating on our sites and projects, taking responsibility as a Principal Contractor to implement our Worker Welfare Management System downstream as so far as reasonably practicable. Multiplex's Welfare Policy and Principles are applicable across our subcontractors, recruitment agents and supply chain. In accordance with Welfare Principle 4 – Recruitment Practices, 'Employees' recruitment must be ethical, legal and without discrimination'. The Welfare Officer assigned on each site is responsible for conducting worker interviews, representative committee meetings, and HR audits. These include questions around ethical recruitment and labour sourcing. Additionally, all workers are inducted into the Welfare Management System across our projects. During these inductions, the phone number of a member of the Welfare Team is given to all workers, ensuring they have access to advice and can raise a confidential and anonymous grievance of any kind. Any grievances raised are investigated, tracked and acted upon within a timely manner. This is supported by the operational monitoring component of the WMS. To provide assurance that the Multiplex Welfare Policy and Welfare Principles are being adhered to, an auditing regime of subcontractors has been incorporated into the Operational Monitoring component of our Welfare Management System. The frequency of audits on subcontractors and/or recruitment agents is dependent on the risk rating determined during the procurement due diligence process and/or at the discretion of Senior Management in the event that a grievance has been raised.

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.](#)

Our workers are paid in accordance with UAE law; on time and inclusive of all benefits. However, we acknowledge that there have been reported incidences (by other operators) of workers not receiving their pay on time or to the full amount. Multiplex has intervened in the past to ensure workers are adequately compensated when a subcontractor has failed to pay wages. Subcontractor wage payment schedules are closely monitored across sites where our Welfare Management System is operating, and any discrepancies are escalated in accordance with Multiplex's grievance remediation protocol.

Recent legislative developments such as the Wage Protection System (WPS), initiated by the Ministry of Human Resources and Emiratisation, have provided a formal mechanism to monitor and document the process of wage payments systematically and in accordance with the law. The WPS has helped us to better monitor our subcontractors and suppliers, with non-compliances or non-payment of wages being effectively captured by Multiplex's auditing processes in the Welfare Management System.

The WPS, in addition to other relevant legal obligations, is captured by Multiplex Welfare Principle 1 – Employment Standards, which requires that employees be paid their wages in a timely manner as stated in their employment contract and by law. To provide assurance that the Multiplex Welfare Policy and Principles are being adhered to, an auditing regime of subcontractors has been incorporated into the Operational Monitoring component of our Welfare Management System. The frequency of audits on subcontractors is dependent on the risk rating determined during the procurement due diligence process and/or at the discretion of senior management in the event that a grievance has been raised.

8) Does your company operate on a contractual “pay when paid” basis in relation to:

a) Subcontractors?

Yes. However, all subcontractor wage payment schedules are tracked and monitored by the Welfare Team to ensure wages are paid in accordance with the UAE Labour Law and in a timely manner.

b) Employee wages?

No.

c) Other creditors? Please specify.

N/A

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.

Subcontractor wage payment schedules are tracked and monitored by the Welfare Team to ensure wages are paid in accordance with the UAE Labour Law and in a timely manner. Multiplex has intervened in the past to ensure workers are adequately compensated when a subcontractor has failed to pay wages. Multiplex uses numerous operational monitoring tools to capture wage payment issues, as previously referenced, including HR audits, interviews, drop boxes, surveys, WRCs and providing the phone number of the Welfare Officer during inductions.

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 Multiplex Welfare Management System is applicable to all of Multiplex’s subcontractors, inclusive of the Multiplex Welfare Principle 5 – Access to Information and Documents. This requires all employees to be in voluntary possession of their identity documents with access available at all times. The Welfare Principles are applicable across Multiplex’s supply chain, and are supported by an auditing regime of subcontractors. The frequency of audits on subcontractors is dependent on the risk rating determined during the procurement due diligence process and/or at the discretion of senior management in the event that a grievance has been raised.

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.

All workers attend a safety induction prior to entering site. Prior to the induction, work permits (ID cards or passports with visa pages) are checked to ensure they are in date, valid and legal. Any workers without a valid work permit are not allowed on the project. This is strictly followed for all workers across all projects (whether subcontracted, manpower or suppliers).

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

Multiplex is compliant with the UAE Labour Law, where all workers are entitled to freedom of mobility. If a grievance is raised to the Welfare Team regarding employment mobility, it is investigated and closed out within a timely manner.

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.

Within our Welfare Management System, Multiplex Welfare Principle 3 – Living Conditions mandates that employees are to be provided with safe and clean living conditions that are subject to regular inspections and audits by the Welfare Team to monitor compliance with applicable law. All non-compliances are tracked and monitored by the Welfare Team for close-out in our action tracker. Our employee accommodation exceeds local legislation and includes the following facilities:

- A full-time worker accommodation management team
- A full-time FM team to complete outstanding maintenance
- Gym facilities
- Laundry machines
- Fulltime cleaning staff
- Free Wi-Fi
- 24 hour CCTV, seven days a week
- Mess area/Canteen
- Induction/Training room
- Drinking water stations
- A first aid station
- A Full-time first aider in the worker accommodation
- Recreation facilities, including indoor games and an outdoor badminton court
- A visitor room
- Shower rooms
- Toilets
- Pest control procedures
- Fire prevention systems and firefighting mechanisms

A scheduled accommodation inspection programme is carried out on our supply chain to ensure compliance with the Welfare Management System, and all non-compliances are recorded and tracked for close-out. During the inspections, if any accommodation non-compliances are found, an action plan is issued to the subcontractor for remediation. If non-compliances are not closed out within a timely manner, Multiplex issues contractual letters, conducts meetings and in some cases involves senior management to encourage the subcontractor to reach a working solution or move to alternative accommodation. Multiplex often assists in sourcing alternative accommodation for our subcontractors, assisting them to resolve accommodation issues and meet our requirements.

To provide assurance that the Multiplex Welfare Policy and Welfare Principles are being adhered to, an auditing regime of accommodation facilities has been incorporated into the Operational Monitoring component of our Welfare Management System. The frequency of audits on accommodation facilities is dependent on the risk rating determined during the procurement due diligence process and/or at the discretion of senior management in the event that a grievance has been raised. Subcontractors across projects with the WMS operating go through inspections by a member of the Welfare Team, with all non-compliances tracked, monitored and closed out in a timely manner. These accommodation inspection scores are monitored using a dashboard, with clear targets and KPIs, and the adoption of appropriate recourse action by the Welfare Officer. In addition to the audits performed by Multiplex, regular authority, consultant and client audits are performed on accommodation facilities.

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

a) safe and adequate nutrition

The worker accommodation management team ensures fresh food is available, with the workers providing input to the menus being set. In July and August 2017, the Welfare Team issued a food survey to a random sample of 169 people. This data was analysed to ensure that future food provisions matched the preferences of the inhabitants. We also conduct frequent education programmes with local community partners, providing information on topics relating to lifestyle habits, nutrition, health and wellbeing.

b) healthcare

All workers have medical insurance and are issued with a medical card upon arrival. No cost of treatment is borne by the worker. Worker accommodations are in close proximity to clinics and multi-speciality hospitals. Our project sites and accommodation facilities have a full-time male nurse providing 24-hour medical care.

c) banking and remittance services

Wages are credited every month to bank accounts and workers can use debit cards, with ATMs, remittance services, and money exchanges all available within close proximity of the accommodation.

d) transportation

Large (26+ seating capacity) and small (minibus) transportation vehicles are provided to transport labourers between their accommodation and workplace. These operate for both day and night shift personnel. The vehicles are regularly inspected and serviced, and provide adequate safety measures,

seating, air conditioning. They are driven by licensed drivers. Our transport is subject to annual inspections by means of a checklist, and we are using this data to develop a phase-out plan of non-air conditioned buses. Shuttle services are available at the weekends and outside of working hours to provide transportation to and from the accommodation.

e) leisure activities

Multiplex's labour accommodation includes several recreational facilities such as gym equipment, Wi-Fi, pool tables, table football, carom boards, table tennis, and badminton courts. The accommodation facilities are also in walking distance of mosques, shopping centres, grocery stores and money exchanges/banks.

Both the gym and internet facilities at the accommodation facilities were encouraged by welfare satisfaction surveys conducted in 2017. From February to July 2017, 50% of all grievances were related to the lack of provision of recreation and gym facilities at the accommodation. This evidence was used by the Welfare Team to secure recreation facilities including gym equipment, carom boards, pool tables and a majalis for general relaxing. Similarly, a greater variety and range of extracurricular activities were held from 2016-17, including:

- The Happiness Workshop
- 4-week yoga programme
- Global English programme
- Workers annual party
- Annual cricket tournament
- Workers Annual Gift Giving Initiative
- Workers Education Fund

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.

At Multiplex, we believe our success lies in our people. Therefore, their health and well-being is our number one priority. The Board accepts it has a collective role in providing Health and Safety leadership in its organisation. Similarly, all Directors and Managers are expected to show high standards in Health and Safety leadership.

Multiplex is on a continuous journey to enhance safety culture and standards across the business and broader industry with over 50 years of health and safety expertise. We work with our clients to design and integrate safety controls during the planning phase of our projects, with the aim of minimising or completely eliminating risk on our sites. We embrace the Safer by Design approach and recognise that through early planning, we stand to have a much greater impact on project outcomes. As a business focused on the long term, we concentrate our efforts on controlling critical or high-consequence risks. We do this by looking for ways to move controls upstream to significantly reduce or eliminate risk, and we reward smart solutions through our internal Global Innovation Awards.

Multiplex have been externally recognised for our Health & Safety performance and initiatives, receiving awards from the British Safety Council and Construction Week Awards, as well as being represented on the IOSH Council, IOSH Committees, IIRSM Committees and the MENA Construction Safety Executives Group.

The Multiplex OHS Management System (OHSMS) is implemented on all sites and is based on the 'Plan-Do-Check-Act' model prescribed within OHSAS 18001. It is designed to exceed all legislative requirements within the UAE. It contains all of our policies and procedures relating to health and safety, including our OHS Manual, OHS Policy, OHS Standard Operating Procedures and OHS Forms. Our OHS Policy specifically outlines our commitment to providing a healthy and safe environment for all employees, subcontractors, suppliers, clients and the community.

A Multiplex Middle East Safety Committee is in place to build and develop a successful organisational safety culture within the Multiplex business. Reporting to the Executive Board, the Safety Committee is governed by a Terms of Reference with the following strategic objectives designed to address all levels of the organisation (Director, Manager, and Operative etc.) and all stages of the project lifecycle as follows:

- explore, develop, distribute, oversee and review Safety activities and programmes;
- facilitate active consultation and collaboration on Safety matters throughout the business;
- promote a robust and resilient culture that incorporates innovative best practices;
- produce industry-leading Safety performance.

The Multiplex Middle East Safety Committee is comprised of the following key members:

- Core team of OH&S Practitioners;
- Executive Director;
- Project Director;
- Representative from Plant and Equipment subsidiary; and
- Representative from internal Labour Supply department.

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

Multiplex complies with the articles detailed within the UAE Labour Law Title Four titled working hours. Depending on the pending works required i.e. concrete pouring and finishing, employees are given the option to volunteer for overtime should the need arise. As per the legal requirement, overtime working hours may not exceed two hours per day, unless such work is necessary for the prevention of the occurrence of a colossal loss or a serious accident. As a principle, Multiplex aims to prevent workers from exceeding overtime limits during peaks in construction activity by increasing the number of

employees for activities combined with thorough planning and a six-week 'look ahead' for all construction activities.

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.

The Multiplex OH&S Management System has a dedicated operational control procedure addressing working in extreme temperatures, inclusive of workers exposed to high temperatures during the summer months in the UAE. Each project is required to develop and implement a summer work plan in accordance with legislative requirements and which addresses the following minimum requirements:

- Exposure assessment;
- Heat stress factors;
- Heat stress evaluation;
- Heat stress prevention;
- Heat stress monitoring;
- Engineering controls;
- Administrative controls;
- PPE;
- Monitoring Programmes; and
- Training.

Each project provides rehydration drinks, drinking stations, increased frequency of rest periods in cool rooms. Education and training programmes, including regular tool-box-talks, posters and the like are provided to the workers in a language that they understand.

Multiplex has planned employee workloads to allow for reduced hours, extra break/rest times. We have also scheduled strenuous physical activities and hot work operations during cooler periods wherever possible, such as early in the morning or during the evening or night. The UAE government also enforces a two and a half hour break between June 15 and September 15, which aids companies working in the UAE to implement control measures to prevent heat stress injuries.

Multiplex projects are required to address the risk assessment for working during summer months and to explain the causes and symptoms of heat-related illnesses and injuries. This includes specifying the need to take regular breaks in cool shaded areas and regularly drink water during the project OHS induction. The project OHS induction is the first stage to providing adequate information, instruction and training to all new employees wishing to work on a Multiplex construction project. The induction is also a great time to recognise new employees and employees returning to work to help them acclimatise to the hot conditions. We begin with 20% of the usual duration of work in the hot environment on the first day, increasing gradually by no more than 20% each day that follows. Experienced workers returning to work begin with 50% of the usual work duration on the first day. They then work 60% on the second day, 80% on the third day, and 100% on the fourth day. However, depending on the individual or environmental factors, it can take several days or longer for a worker to become fully acclimatised.

Each Multiplex project conducts the working in the ‘summer month’s campaign’ that is released from the relevant local authority during the months of June – September and also ad hoc throughout the year in addition to other campaigns that will be conducted that month. Electrolyte suppliers are contacted to hold specific heat prevention training for all employees working in the project.

Visual aids are placed around the project to assist in bridging any communication barriers. This includes self-monitoring urine colour charts being placed in all project toilets.

To monitor and communicate the high temperatures and humidity the project nurses use a handheld heat stress monitor to record the Thermal Work Limit (TWL). This handheld monitor assesses the condition and indicates clear findings regarding the TWL. This is recorded three times a day (AM, noon, and PM) and Multiplex uses a three flag system to communicate the findings to employees. Using different colour flags, employees are able to determine the TWL and the recommended working criteria:

1. Green Flag (low risk) – safe to work
2. Yellow Flag (medium risk) – take caution, 45 minutes work/15 minutes rest
3. Red Flag (high risk) – restrict/job rotation work, light work 45 minutes work/15 minutes rest or heavy work 15 minutes work/45 minutes rest.

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

	Direct Workforce	Subcontracted Workforce
2016	1	1
2017	0	0

b) Permanent disabilities in your direct and subcontracted workforce

	Direct Workforce	Subcontracted Workforce
2016	0	0
2017	0	0

c) Lost-time injuries in your direct and subcontracted workforce ^[1]

	Direct Workforce	Subcontracted Workforce
2016	1	5
2017	1	8

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.

^[1] 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)

Within our Welfare Management System, Multiplex Welfare Principle 8 – Grievances and Labour Disputes requires that employees be provided with access to Workers Representative Committees in a language that they understand on project site(s) and within their accommodation facility. As a part of the Welfare Management System, monthly Worker Representative Committees (WRCs) are conducted by the Welfare Officer assigned to the project. It is the responsibility of the Welfare Officer to establish a Workers Representative Committee. WRCs fill the gap where there is a lack of access to collective representation and bargaining. Meeting minutes are recorded and a signed attendance list is kept for each meeting. The WRCs have been established to oversee and review all welfare activities and programmes being implemented by subcontractors. They also act as a forum where any ongoing worker grievances can be raised. Key topics discussed at Workers Representative Committees include:

- Health, safety and security
- Wage payment issues
- House rules
- Drug and alcohol awareness
- Education programmes
- Recreation activities
- Transport within, to and from the housing facilities outside working hours

Minutes are taken at each WRC, and action points are recorded. Where any outstanding grievances are recorded in the grievance tracker, they are closed out within the specified time frames.

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 Multiplex Welfare Management System is applicable to all Multiplex subcontractors, inclusive of the Multiplex Welfare Principle 8 – Grievances and Labour Disputes, which mandates that employees have the means to formally report grievances and are supported in resolving labour disputes. The following grievance mechanisms are provided to all workers to report grievances in a language that they can understand:

1. Daily anonymous and confidential worker interviews conducted by a member of the Welfare Team
2. Monthly Worker Representative Committees (WRCs). The Welfare Officer assigned to a project is responsible for establishing a Workers Representative Committee. WRCs fill in the gap where there is a lack of access to collective representation and bargaining. Meeting minutes are recorded and a signed attendance list is kept for each meeting
3. The Welfare Team is responsible for establishing Worker Welfare 'drop boxes' at the project site and accommodation camps
4. The 'ethics hotline' is available in Hindi and English

The grievances are assessed, categorised, recorded, tracked and closed out using a project grievance tracker. All grievances are recorded confidentially and anonymously, and all labourers are supported by the Welfare Team in resolving their grievances. The status of specific grievances is captured in a grievance tracker, which ensures that all grievances are attended to and closed out within specified time frames. Grievances are categorised by 'risk', where 'high risk' grievances are investigated immediately by the Welfare Team and are escalated to senior management for close-out. Additionally, the Welfare Team uses a Monthly Dashboard to capture operational data and check compliance with our KPIs, which include the percentage of grievances closed across all sites. On average, the Welfare Team closes out 79% of all grievances reported per month. The remaining grievances are closed out within the following month, providing workers with effective access to remedy. Multiplex's grievance procedures have been reviewed by a reputable third party independent human rights consultant.

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.

During 2016, a total of 317 grievances were raised, which represents an average of 27 grievances per month. These grievance numbers have been calculated by summing all the grievances raised across projects that have the Welfare Management System operational, derived from a monthly dashboard which records the number of grievances raised. The grievances raised across our projects concern areas such as:

- Personal protective equipment
- Food
- Leave
- Wage payment
- Accommodation

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?

Multiplex is a founding member of Building Responsibly, the global business coalition formed to promote the rights and welfare of workers in the engineering and construction sector. In 2018, Multiplex ME co-authored the Building Responsibly Worker Welfare Principles, which are designed to set the benchmark for worker welfare in construction and promote best practice in ten specific areas, incorporating feedback and endorsement from key stakeholders. Multiplex and five other construction companies launched the Worker Welfare Principles in London in June 2018 (please see Appendix 3). This is the most recent example of the pioneering work Multiplex has done to drive industry change in the field of workers' rights and welfare. Additionally, Multiplex has been working collaboratively with many key partners – including the International Labour Organisation, the Institute for Human Rights and Business, and Engineers Against Poverty – providing commentary on several papers, articles and thought pieces.