

2018 Questions for Construction Companies in Qatar
Migrant Worker Rights

Name of company: **Salini Impregilo S.p.A.**

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

Saini Impregilo is currently involved in the following two projects in Qatar:

Al Bayt Stadium

In July 2015, the Group was awarded the contract to build the Al Bayt stadium in Al Khor, roughly 50 km north of the capital Doha. The Group's share of the contract, which entails the design and construction of one of the sports complexes where the 2022 FIFA World Cup matches will take place, is worth approximately €770 million. The contract was awarded by the Aspire Zone Foundation, which is responsible for the development of Qatar's sports infrastructure. The stadium will be able to accommodate 70,000 spectators with an area of 200 thousand square meters. The project is an example of an eco-sustainable work, thanks to modern construction techniques and the use of environmentally friendly and low energy impact state-of-the-art materials. The Group's share of the contract is 40%.

Red Line North Underground

In 2013, Salini Impregilo, as leader of a joint venture with a 41.25% share, won the tender called by Qatar Railways Company (Qrail) for the design and construction of the Red Line North Underground in Doha. The project, along with three other metro lines, is part of a programmed promoted by Qatar to build a new infrastructure mobility system included in the National Development Plan for 2030 ("Qatar National Vision 2030"), which provides for significant investments to ensure sustainable economic growth.

Salini Impregilo is committed worldwide to ensuring respect for the rights enshrined in the International Charter of Human Rights and the fundamental conventions of the International Labour Organization in line with the principles established in its Code of Ethics and Sustainability Policy.

The Company protects the integrity of its employees, ensuring work conditions that respect the dignity of individuals, safeguarding workers from physical or psychological violence or mobbing and opposing any discriminatory or damaging behavior to an individual, their convictions and inclinations.

Salini Impregilo does not accept any form of illegal, child labour or forced or compulsory labour. It offers, without discrimination, equal opportunities based on the individual's professional qualifications and performance capacity. It recognizes and values the diversity of its employees as an essential element for its growth. It adopts appropriate measures to avoid favoritism, nepotism or patronage during the recruitment process and throughout the employment relationship.

Salini Impregilo guarantees its employees their right to freedom of association and collective bargaining in accordance with the legislation applicable in the country where they work. It adopts a positive approach to labour organizations and an open attitude to trade unions and their activities.

- 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.*

Al Bayt Stadium

Joint venture partners: Galfar Al Misnad W.L.L., Cimolai S.p.A.

Subcontractors: L & P, Qatar Ready-mix Concrete, Al Anis Trading, Arab Builders, Begin Manpower company, Desert King, Draieh Logistic, Ejar Cranes, Germen Concrete, German Steel, Hemaya Security Services, Desert Line Manpower Supply, Medtel, Pigeon Manpower Supply, One Not One, Global Mechanical, Professional Builders, Iskan Group, Al Khiyran Group, Combined Construction, Roots Qatar, Qatar Meta Coats, ASMA, S & T, Qatar Kentz, Vision Development, ACTS, Group 10, Metrix Qatar, Kone Elevator, Great Deal, Hightex, Trags, Qatar Al Attiya, Technicity, Danem, Dicotech, Solb26, Handar, Mercigaglia, Al Jaber Trading, Al Falah Ready mix Concrete, Frijns trading, Renesco Al Bawakir, Challenger trading, Gulf Steel, Elite, NAFFCO, Blue Star, Delusco, Mettito, Hatco, Qtec, Qpec, Somi Qatar, Tawasol, Blue Canoy, GBM, Dere, Global Sources, Graner Manpower Supply, Right Tek, SAMKO, Hillpoint, DESCO, CMC, Mastro.

Recruitment agencies: Reaz Farah Manpower Services.

Red Line North Underground

Joint venture partners: SK Engineering & Construction Co. Ltd., Galfar Al Misnad W.L.L.

Subcontractors: CIO JV, CMTC, E-CLIKS, SOCOTEC International, DOKA Qatar WLL, Teyseer Security Services, ICC JV, TCS JV, Thyseenkrupp Industries & Services Qatar LLC, J J Infra, Doha International Company, Ironmount Qatar, Qatar Meta Coats, L&T, Nabina Interiors, Intervention Solutions, Poullaides, Galfar, Kentz Qatar, Anel MEP, Charles & Musa, FAL Qatar, Al Majd, Electro Mechanical Qatar (QEMC)

Recruitment agencies: Reaz Farah Manpower Services, Sommerman Skinner Associates

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

Salini Impregilo provides public information on its global workforce data in the Annual Report (for 2017, please refer to pages 150-151).

Link: <https://www.salini-impregilo.com/static/upload/748/748308b36543017531e6c0cb898782691.pdf>

Specific workforce data on operations in Qatar is reported below.

Workforce data at June 30, 2018	Al Bayt Stadium	Red Line North Underground
a) Directly employed ³ workers ⁴	783	743
b) Personnel employed by subcontractors ⁵	4,404	5,837

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

⁴ Data refers only to resources under contract with Salini Impregilo S.p.A.

⁵ Personnel engaged both in the realization of subcontracted works and in ancillary services

c) Personnel ⁶ employed by labour supply companies	1,303	526
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At Al Bayt Stadium project, our directly employed workers come from the following countries: Bangladesh, Egypt, Ethiopia, Philippines, Pakistan, India, Kenya, Nepal, Nigerian, Sri Lanka, Sudan, Thailand, Myanmar, Uganda, Ghana & Vietnam.

At Red Line North Underground project, our directly employed workers come from the following countries: Bangladesh, Egypt, Ethiopia, Philippines, India, Kenya, Nepal, Nigeria, Pakistan, Sri Lanka, Sudan, Thailand & Vietnam.

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.*

Salini Impregilo has defined a set of policies and guidelines to ensure conducting its business activities worldwide in line with the principles of sustainable development.

In particular, the Company adopted a formal **Sustainability Policy**, composed of 10 principles including the protection of human rights, health and safety of the entire workforce employed on its projects around the world.

Link: <https://www.salini-impregilo.com/static/upload/sus/sustainability-policy.pdf>

Moreover, the Company has defined a **Code of Ethics**, which sets out clear principles and rules of conduct that people who work for or with Salini Impregilo are required to adhere to during their everyday work. The Code applies also to third parties that directly or indirectly, temporarily or on an ongoing basis, work with the Company.

Link: <https://www.salini-impregilo.com/static/upload/cod/codice-etico.pdf>

Furthermore, in October 2014 Salini Impregilo and the Italian and International Construction Unions (Feneal Uil, Filca Cisl, Fillea Cgil, Building and Wood Workers International - BWI) signed an **International Framework Agreement** to promote and respect worldwide the fundamental human rights principles, as defined by the key international declarations of the United Nations, the International Labour Organization and the OECD.

The International Framework Agreement covers child labour, forced or compulsory labour, the freedom of association and collective bargaining, nondiscrimination, work hours, economic treatment, work conditions, specialized training, the environment, welfare and employment relationships. The Company agreed to authorize access to its work sites by trade union representatives after local agreement with the project and to adopt the most efficient process should a BWI member request a trade union be recognized. The agreement also provides for monitoring and assessment tools to be used by the Company and the trade unions, which meet at least once a year to discuss them.

⁶ Personnel engaged by temporary work agencies

Link: http://connect.bwint.org/pdfs/IFA_SalinImpregilo_EN.pdf

All the above-mentioned documents cover both direct and indirect (subcontractors, labour supply companies and other suppliers) workforce.

- 4) *Does your company require subcontractors and other entities in your contracting chain in Qatar to comply with your human rights and other rights-related policies and procedures? If yes:*
- a) *How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?*

The Company selects its suppliers and subcontractors using proper and transparent standards and selection criteria which involve checking their quality, technical/professional qualifications, compliance with standards about human rights, labour regulations, including equal opportunities, health, safety and the environment as well as prices.

In particular, the Procurement Department manages the supplier qualification process, which involves a number of preliminary checks of the potential supplier's reputation, its expertise and that it is not already included in the Reference Lists.

Contracts with suppliers and subcontractors include provisions requiring them to comply with the applicable regulations, the Code of Ethics, the Organization, Management and Control Model (i.e. as provided for by the Italian law) and the Anti-Corruption Model as well as quality, health and safety and environment requirements. The contracts have specific termination clauses if the suppliers / subcontractors do not comply therewith.

Furthermore, in Qatar, in line with Supreme Committee (SC) guidelines, all the proposed sub-contracts (OCP's) shall get the premobilization Approval to work on SC projects (Al Bayt Stadium Project). This approval is needed for blue collars only.

All OCP's must comply with the following critical points before mobilizing on site:

- 1- All Ethical Recruitment procedures shall be complying with SC standards and Qatar Labour Law related to wages, offer letters, labour agreements, recruiting procedures and workers welfare statements;
- 2- All the workers shall have valid QID, Health card, Workers compensation policy covering all injures and death cases;
- 3- All workers must live in accommodations compliant with SC regulations and Qatar labour law.

- 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?*

By accepting the Code of Ethics, suppliers and subcontractors commit themselves to apply the same selection criteria used by the Company when selecting their sub-contractors. In this way, Salini Impregilo encourages and promotes compliance with its principles along the entire supply chain.

Moreover, in Qatar Salini Impregilo's Workers Welfare Department makes sure that all the sub-contractors and their respective sub-contractors comply with all the standards and regulations established by the Supreme Committee, Qatar Foundation and Qatar labour law.

Recruitment

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

Salini Impregilo S.p.A. Qatar Branch recruits migrant workers through recruiting agencies located mainly in Asia-Pacific area. The relationships with these agencies are regulated by specific contract agreements that contain a number of human rights related clauses (i.e. Recruiting Agency may not retain passports or ask recruitment fees to workers; Recruiting Agency must inform workers about their human rights, etc.).

The steps followed are:

- Request of personnel to the agencies;
- Interview between the HR Staff and the Head of department in needs of personnel with the candidate himself (in case of professional or senior personnel only) through landline or Skype. In case of unskilled workers, the recruiting agencies will look for the suitable candidates for the position required without need of interviewing them;
- If the feedback is positive, we proceed with the Visa application and issuance of the air ticket to Qatar.

Once the worker is in Qatar, we immediately start the procedure to obtain the Residence Permit with the issuance of the ID and Health card. If any medical expenses occur in between the period of the request of the health card and its issuance, we reimburse the expense to the worker.

- 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.*

Salini Impregilo's policy on migrant workers' rights is publicly-available in the Annual Report (for 2017, please refer to pages 161-162).

Link: <https://www.salini-impregilo.com/static/upload/748/748308b36543017531e6c0cb898782691.pdf>

- 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?*

The recruitment agencies working for the Company are in charge of explaining the terms and condition of the offer letter, the nature of the role and the working and living conditions in Qatar, including the risks of the work to be performed and that the worker is not required to pay any Recruitment or processing fees. The recruitment agency must provide all the above information in the local language of the workers as per contract obligation. The offer letter is duly signed by the management and by the candidate itself who will sign the employment contract upon the arrival in the Country, stating the same terms and conditions of the offer letter.

- 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?*

Salini Impregilo S.p.A. Qatar Branch works with recruiting agencies approved by the government of the hosting Country and directly pays any fees for the hired workers. The

Company does not work with agencies that ask recruitment or placement fees to the workers and clearly prohibits this practice in the agreements with them.

- 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.*

Each worker is requested on his arrival in Qatar whether he has paid any fee to the agency. If proven, the relevant amount is reimbursed to the worker and deducted from the agency's invoice. Moreover, the agency is warned. On the second proven payment of fees, the agency is blacklisted.

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

Salini Impregilo requires all those working on its sites to comply with its standards. For this reason, as said before contract agreements with recruitment agencies clearly prohibit any recruitment or placement costs for the workers.

Moreover, sub-contractor's personnel are considered in the same way as direct employees. They are hired in full compliance with Qatar Labour Law rules, with accommodation, food, transportation and yearly tickets directly paid by Salini Impregilo. These personnel are also subject to the same health and safety's rules, training and controls as per direct workforce.

Payment & wages

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

Salini Impregilo has operating procedures and practices designed to ensure that its remuneration policies comply with the regulations applicable in all the countries where the Group operates and especially the minimum wage requirements, where these exist.

In Qatar, wages are paid within the seventh working day of the following month with a transfer into the bank account we open to each worker. We also provide them with a personal debit card linked to their bank account.

The Company adopts the Wages Protection System (WPS), an electronic system promoted by the Ministry of Labour and QCB to monitor and document the process of worker wage payment, as per the Labour Law No. (14) of 2004. The system ensures that employers are committed to the wage payment process systematically and in a timely manner pursuant to the Rules and Conditions provided for in the Labour Law. The general objectives of the system are:

- Protecting labour group from manipulation of their financial entitlements;
- Promoting security and stability in the State by establishing a safe work environment;
- Strengthening the Human Rights principle in Qatar;
- Saving workers and employers from keeping cash in their workplaces which may be exposed to loss or theft;
- Enabling the Ministry of Labour to continuously access and be informed of the workers' information and compare them to the data in its possession in order to ensure compliance with the provisions of the Labour Law;
- Reducing legal disputes between parties as well as effort and time wasting;
- Assisting the judiciary in issuance of rulings and settlement of disputes related to the workers' entitlements.

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

a) *Subcontractors?*

Subcontractors are paid on a work advancement basis, with an advance payment at the contract's signature covered by a guarantee in most cases and further payments as the work advances.

b) *Employee wages?*

As already stated above, all wages are paid within the seventh working day of the following month with a direct transfer into the workers' bank accounts.

c) *Other creditors? Please specify.*

Other creditors (e.g. suppliers, consultants, service providers) are paid accordingly with the specific contract agreements' requirements agreed-upon, that usually provide for an advance payment at the contract's signature and further payments as the supply/service advances.

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

The Company has an active and ongoing monitoring on all the parties involved in its projects, including its subcontractors. In the past, Salini Impregilo has faced worldwide some cases of subcontractors not able to regularly pay wages to the respective workers. In these cases, the Company managed to directly pay wages to the subcontracted workers or to hire them as direct employees.

In Qatar, as per Supreme Committee's Guidelines, if any sub-contractor does not pay workers' salaries, Salini Impregilo as main contractor can hold the payment of this sub-contractor and directly pay the pending salaries of its workers.

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?*

Salini Impregilo S.p.A. Qatar Branch has best practices in place concerning this issue. It does not retain any passport and gives to workers the possibility to safely store their passports after the issuance of the ID card, having access to them anytime upon their request.

Salini Impregilo makes sure that all workers who is working in the site have their original documents such as Passport, QID, Health Card and Labour agreement. We request from all sub-contractors to submit acknowledgement from the workers that they received their original documents. Our Workers Welfare department periodically arranges random interviews with the workers on site to confirm if they received their original documents and have safely stored them.

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.*

As already stated, once the worker is in Qatar we immediately start the procedure to obtain the Residence Permit with the issuance of the ID and Health card. If any medical expenses occur in between the period of the request of the health card and its issuance, we reimburse the expense to the worker.

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

Salini Impregilo S.p.A. Qatar Branch has best practices in place concerning these issues. It provides the No Objection Certificate (N.O.C.) to all workers allowing them the transfer of employers within the Country. Moreover, exit permits are issued once the leave is approved by the Head of the Department to which the worker belongs and by the HR Manager, when the workers need to repatriate or in case of resignation/termination of the contract.

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.*

It is a Salini Impregilo tradition and top of its priorities to ensure that each and every worker regardless of nationality, level, education, etc. is provided with food, accommodation and transportation according to the host country regulations.

In Qatar the Company operates according with the local labour law, Qatar Foundation, FIFA Standards 2022, Supreme Committee 2022 requirements, as well as in respect with International Labour and Human Rights Requirements.

For both the ongoing projects in the Country, the Company has state-of-the-art accommodation camps designed in full respect of the most advanced international best practices. It is worth mentioning that the accommodation camp for the workers employed at the Red Line North Underground project has been among the earliest camps to be realized in the Country with high-level standards, so much so Qatar Foundation awarded us with an official letter of appreciation and several international delegations have visited the camp so far. The accommodation camp hosting workers employed at the Al Bayt Stadium has represented a further advancement in this field, having been realized in full compliance with the Supreme Committee requirements. A complete description of the camps' features is provided in the previous questionnaire submitted to Business & Human Rights Resources Centre in 2016.

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

a) *Safe and adequate nutrition*

Our accommodation camps are equipped with cooking and dining facilities to ensure adequate food for all the hosted workers. Centralized kitchens prepare several menus tailored on the workforce composition and an adequate number of dining halls are available to workers.

b) *Healthcare*

Our accommodation camps include well-equipped licensed medical clinic facilities in agreements with local public and private external clinics to provide assistance to urgent cases, as well as cases that need special attention. All workers are also provided with Health Cards that made them able to access medical facilities in the Country.

c) *Banking and remittance services*

As already stated, the Company opens a bank account for each worker and provide him/her with a personal debit card linked to the bank account. Wages are paid with a transfer into those bank accounts.

d) *Transportation*

Our accommodation camps have daily bus services in place, providing workers with the possibility to move from the camps to shopping malls, etc.

e) *Leisure activities*

Our accommodation camps are fully equipped with leisure and free-time activities, such as recreational areas with equipment for social games, TV mega A/C rooms for different nationalities with main languages, gyms, football / basketball / volleyball pitches, internet centers, mini markets, laundry shops and barber shops with controlled prices, as well as welfare offices with multilingual assistance 24/7.

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.*

Health & Safety is one of the top priorities for Salini Impregilo. In all projects, we have a well-established, up to date Health & Safety Policy clearly depicting the commitment of the Management towards Health & Safety. The Company has implemented a Health and Safety Management System in compliance with OHSAS 18001 standard, certified by an independent external body.

In our ongoing projects in Qatar, in conjunction with our clients Qatar Rail and Aspire Foundation, we are firmly committed to achieve "Zero Harm", namely zero fatalities, zero disabling injuries, zero injuries to the members of the public, zero long term harm to health, zero harm to stakeholders, zero accident frequency rate and zero harm to the environment. To achieve "Zero Harm" all employees and staff, including subcontractors that join the project, receive an induction course on the legal requirements for working safely in construction sites as per QCS 2010, clients' requirements and Salini Impregilo's site rules. We have also established a practical training centers at our employees' accommodation, where the new joiners receive training on the practical aspects of the construction activities, such as safe use of mobile scaffoldings, accesses scaffolding, use of ladders, experience of falling from height, electrical safety firefighting, use of personal protective equipment (PPE) and mechanical lifting. A complete description of the Health & Safety System in place in Qatar is provided in the previous questionnaire submitted to Business & Human Rights Resources Centre in 2016.

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*

As per the Company policies and agreements with the international trade union BWI, the number of working hours shall comply with national regulations and collective agreements, where present. In particular, in Qatar, actual working hours shall not exceed ten (10) hours

unless the work is necessary for the prevention of gross loss or dangerous accident or for the repair or alleviation of the consequences of the said loss or accident.

The worker shall be allowed of a weekly paid rest which shall not be less than twenty-four consecutive hours and Friday shall be the weekly rest day. With the exemption of shift workers, a worker shall not be required to work more than two consecutive Fridays (Qatar Labour Law Art.74&75).

- *Whether overtime work is voluntary*

As per the Company policies and agreements with the international union BWI, overtime work shall be voluntary whenever possible, shall not be demanded on a regular basis and shall always be paid at a premium rate, without prejudice to the fact that one rest day a week shall always be guaranteed. In particular, in Qatar, the ordinary working hours are forty-eight (48) hours per week at the rate of eight hours per day. Exception may occur during the month of Ramadan in line with Qatar Authority requirements.

Workers may be required to work additional hours to the working hours specified above, provided that the actual working hours per day shall not exceed ten (10) hours unless the work is necessary for the prevention of gross loss or dangerous accident or for the repair or alleviation of the consequences of the said loss or accident. All the overtime work is voluntary as we make sure that any worker is forced to work more than the working hours which is mentioned in the labour law.

- *What the premium is for overtime work*

As per the Company policies and agreements with the international trade union BWI, overtime is always paid at a premium rate. In particular, in Qatar the additional working hours are paid at the rate of 125% of the basic hourly wage. If the circumstances of the work necessitate the employment of the worker during the rest day, the worker shall be paid at the rate of 150% of his/her basic hourly wage.

- *How the company prevents all workers on its projects from exceeding overtime limits during peaks in construction activity*

Work programs are defined considering national regulations and local labor laws, so that the workforce to be employed in each phase of the projects ensures the respect of overtime limits.

Salini Impregilo's Workers Welfare Team requires to all the sub-contractors a monthly report including the time sheets for their workers, which show all the worked hours. The Workers Welfare Team then checks that all the sub-contractors' workers have not worked more than 10 hours daily or 260 hours monthly. If any sub-contractor is found exceeding the permitted limits, Salini Impregilo immediately notices this point to the sub-contractor requesting a commitment letter from its management confirming that the working hours will not exceed more than what is mentioned in labour law.

- 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 Qatar Salini Impregilo strictly adheres to local laws on summer working months and adopts and communicates a specific procedure to minimize potential detrimental health effects for employees / sub-contractors resulting from excessive heat that may result from working outdoors or within indoor environments with elevated temperatures.

Local law strictly prohibits working during hot daily hours: from June 15th till August 31st it is forbidden to work outdoor from 11:30 a.m. till 3:00 p.m.

Besides following the Law and reshaping daily working hours accordingly, Salini Impregilo has adopted a procedure that prescribes specific behaviors and activities to be carried out during summer months. In particular:

- It defines work and rest schedule with reference to thermal work limit (TWL). TWL gives measures of the maximum safe work rate for the weather conditions;
- It identifies heat injuries and illness symptoms and treatments.

There are designated areas with refrigerated (A/C) cooling, available for rest/meals/breaks as per the numbers of workers present in each site with seating facility 1.5 m2 per worker in line with Welfare Standard for Migrant Workers.

All stations ensure a provision of work face cooling and ventilation system near the work areas including surface and station box.

Proper communication is ensured through the health and safety induction all workers (direct and subcontracted) must undertake before starting the activities.

- 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.

Salini Impregilo provides public information on its global safety performance in the Annual Report (for 2017, please refer to page 158).

Link: <https://www.salini-impregilo.com/static/upload/748/748308b36543017531e6c0cb898782691.pdf>

Specific safety performance data on operations in Qatar is reported below.

Safety performance	2016		2017	
	Direct workforce	Subcontracted workforce	Direct workforce	Subcontracted workforce
a) Work-place fatalities	0	0	0	0
b) Permanent disabilities	1 (10% Disability)	0	2 (Both 16% Disabilities)	0
c) Lost-time injuries ⁷	8	3	19	5

In 2017 the total worked hours in the region grew of about 60% when compared to 2016. Consequently, the safety injury rates remained almost constant across the period.

Representation and remedy

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

In countries such as Qatar, where local law restricts the ability of workers to form or join trade unions, Salini Impregilo seeks to give workers alternative means of expression.

⁷ Lost time-injuries calculated on the basis of injuries resulting in incapacity for work of at least one day (excluding the day of the accident)

At our accommodation camps a committee, formed by workers, residents' representatives and the heads of all camp departments, is in place to examine and discuss once a month issues of mutual concern. Input for discussion comes from the suggestions, grievances or any other comments submitted by the workers through the Comment Boxes available at all the common camp areas. Monthly committee's meetings are set up as open and constructive forums, with the aim of hearing and understanding the raised concerns, discuss them and find viable solutions to improve the quality of life and wellbeing of the workforce.

During the committee's meetings, participants explain their issues and grievances, discussing them with the representatives of the various departments to find possible solutions. Following the meeting, the agreed solutions are implemented, and feedbacks are asked during the following committee's meeting.

- 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 has two grievance mechanisms in place to collect concerns from the workforce, one at site level and the other at company level.

The site-level grievance mechanism consists of Multilanguage Comment Boxes available at all the common accommodation camp areas. Workers are informed on the grievance mechanism in place during the induction course they attend at hiring. In addition, near the Comment Boxes special card explaining how to submit grievances are available. The Welfare Office weekly collects, catalogues and records all the received messages, in order to be examined during the monthly camp committee's meetings. Any form of retaliation is firmly forbidden; supervisors are clearly informed about this and measures such as warnings or terminations can be applied in case of violence, harassment or abuse.

The company-level mechanism consists of a web-based whistleblowing system that allows everybody (i.e. employees, subcontractors, clients, suppliers, communities, other stakeholders) to make anonymous or confidential (at their own description) notifications about potential violations of ethical principles, laws and regulations, while being protected against any form of reprisal, discrimination or unfair treatment. All reports are sent via the secure EQS Group server to the Compliance Department of Salini Impregilo S.p.A. A Case Manager from the Compliance Department is assigned to each received case. Such Case Manager performs a preliminary analysis of the case to establish its validity. The Case Manager may contact the claimant through the Integrity Platform in case of questions or further information. In the event of concrete reports, third party independent specialists may be involved. The claimant is informed as soon as the investigation of the reported incident is concluded.

- 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.*

Main grievances received from the direct workers in the period were referred to food menus served at the canteens, requested to be more comprehensive to meet the taste of each nationality, and to Facility and Transportation schedules, requested to be managed more appropriately. The above-mentioned issues have been tackled during the Camp Committee's meetings and solved on a quarterly basis.

In the period, some sub-contractor's workers raised concerns with regards to the delay of their monthly salary payments (delay for 10-20 days). Salini Impregilo's Workers Welfare Team immediately arranged a meeting with the sub-contractor's management to inform them that it is

not acceptable to delay workers salary and push them to pay the salaries on time. In the meantime, Salini Impregilo's Workers Welfare Team arranged random interviews to make sure all the workers on the site receive monthly salaries on time without any delay.

Other information

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

As per the Supreme Committee for Delivery and Legacy (SC) Workers' Welfare Standards (WWS), a Workers' Welfare Forum (WWF) was established by the GSIC-JV management in October 2016 in Al Bayt Stadium Project. The forum facilitates workers, via the Worker Representatives (WRs) to raise matters of concern to them on any issue without fear of retaliation. The WWF meeting is chaired by Project Workers' Welfare Officer (PWWO) / Workers' Welfare Officer (WFO) and deliberates grievances/suggestions related to accommodation, food and nutrition, salaries and overtime, health, benefits, transport, social and recreation activities. As per the SC WWS, an election has to be conducted every six months to elect WRs, requiring fair representation of nationalities for each accommodation. The process allows appointment of WRs with demonstrable leadership skills, who can raise matters related to workers' interest to the Senior Management.

The WWF was established for Al Bayt Village accommodation, where GSIC-JV-SC project workers are accommodated. The WWF consists of Nine Workers Representatives (WRs) from eight nationalities. Since October 2016, among all the grievances raised, 90 percent of the grievances were resolved within three working days from WWF & rest were closed within next WWF. We arrange Election in workers accommodation to let the workers choose of Workers Welfare Representatives from different nationalities as part of the initiative to have proper representation of the workers in raising issues about their working and living conditions through the monthly workers welfare forum.

In compliance with the Supreme Committee standards, Workers Welfare Forum is carried out every month to identify problems encountered by workers regarding their working and living conditions in general and thereafter to facilitate their solution.

The organization is working hand-in-hand with its other contracting parties along with the Supreme Committee, a local initiative in upholding Workers Welfare Standards and in making sure what is due to the workers is actually given to them.

ISG JV Doha Metro Red line North Underground handed RoSPA Silver Award for health and safety practices

ISG JV Doha Metro Red Line North Underground has been handed a prestigious award in recognition of its practices and achievements in helping its staff/worker/clients/contractors get home safely at the end of the working day.

ISG JV Doha Metro Red line North Underground has achieved a Silver in the internationally-renowned RoSPA Health and Safety Awards, the longest-running industry awards scheme in the UK.

The RoSPA Awards scheme, which receives entries from organizations around the world, recognizes achievement in health and safety management systems, including practices such as leadership and workforce involvement.

