

Questions for construction companies regarding working conditions in the UAE

Note: Question 11 provides the company with the opportunity to describe challenges confronted in the areas covered by the preceding questions.

Where possible, please attach or provide a hyperlink to the policies and standards you refer to in your answers.

- 1. Social responsibility or human rights policy:** Does your company have a publicly-available commitment to human rights or to social responsibility? If so please share the link.

We believe that organisations do not work in isolation. They are impacted by society around them and in turn impact society. They are dependent on broader society for their staff and customer base, and contribute to wider society by creating jobs and wealth and offering services and products.

Al Naboodah Group Enterprises has not only rights, but also obligations and responsibilities. ANGE is very proud of its Emirati heritage and appreciates that its future is intertwined with the future of the UAE. Balancing the company's needs with those of society will be key for the success of the company itself, society and the environment. With this in mind, Al Naboodah Group Enterprises has a clearly defined sustainability policy and sustainability council that pushes us as an organisation to embrace sustainability in everything we do. Our sustainability framework covers many things from worker welfare to environmental responsibility and ethical supply chain management. ANGE is committed to ensuring that every employee is treated with fairness and dignity; accordingly, any discriminatory practice based on race, colour, sex, age, religion, ethnic or national origin, disability or any other unlawful basis is not tolerated.



Please look at the below link for our sustainability policy

http://www.alnaboodah.com/About_us/Csr.aspx

[Please find attached our code of conduct ANGE General-Code-of-Conduct_EN.pdf](#)

2. **Scope of operations:** Please describe the nature and scope of your company's operations in the UAE, including reference to current projects and business partners (herein 'business partners' inclusive of sub-contractors, suppliers, and joint ventures).

Al Naboodah Group Enterprises (or "Group Enterprises" or "ANGE") was established by Saeed & Mohammed Al Naboodah Holding at the end of 2014. Its purpose is to be the management and governance vehicle for the operating groups of the Saeed & Mohammed Al Naboodah Group. It is responsible for both the construction and commercial sectors of the conglomerate.

The Al Naboodah Commercial Group partners with a diverse portfolio of global brands in the transportation, travel, electrical and furniture arenas.

For purposes of this questionnaire we will focus on the Al Naboodah Construction Group

The Al Naboodah Construction Group (ANCG) started operations in the UAE in the 1960s and today employs in excess of 14,000 people. Part of Al Naboodah Group Enterprises, ANCG is managed with a wealth of international expertise and concentrates on four major areas of construction: civil engineering, building, MEP and the supply of specialist plant and equipment. Many of the country's roads, bridges and tunnels have been engineered and built by ANCG and the company has a strong track record of executing successful projects at major airports in the UAE. Our building and MEP divisions have decades of success in the building and fitting out of district cooling plants, airports, hotels, mixed use buildings, residential, shopping malls, retail centres, healthcare and sports facilities. ANCG is in the unique position in the GCC construction industry of being self-sufficient, supplying its own asphalt, concrete and plant and machinery. ANCG has worked on many of the UAE's iconic projects including Palm Jumeirah, Business Bay, Yas Island, Dubai Water Canal Project, Dubai airports, DWC, Expo2020 and NAS Arena. www.alnaboodahconstruction.com.

Some of the major awards our Group companies have won are

- Dubai Human Development Appreciation Award 2015/16, Government of Dubai
- HSE Initiative of the year Award 2015, MEP Awards 2015
- Best MEP Contractor of the year Award, MEP Awards 2013
- DCP Contract of the Year Award, Climate Control Awards, 2012

We also conduct and participate in health checks for our employees on regular basis in partnership with Dubai Health Authority, International Modern Hospital, Aster Health Care and others.

The Group organises sports and cultural events and competitions for its construction workers so that they enjoy their free time, release their stress as well as develop team spirit.

3. **Sub-contracting:** How many workers do you hire directly and how many are hired by sub-contractors?

ANCG currently employs around 14,800 people directly in the UAE and a further 350 are employed through our sub-contractors.

4. **Health and safety:**

In direct operations and in contracts with business partners:

- a) What is your company's approach to ensuring workers' health & safety in the UAE?

Health and safety (HSE)

In direct operations and in contracts with business partners:

- a) What is your company's approach to ensuring workers' health & safety in the UAE?

ANCG is committed to developing a health and safety culture that results in its employees working safely, thereby preventing injury to personnel, damage to the environment, plant, equipment & machinery and preventing ill health. Our target is "Zero Accidents Every Day". As a result our OHSAS 18001 and ISO14001 certified HSE Management System is based on the following key elements;

Awareness:

- Clearly defined Health, Safety and Environmental Policy
- Communication and Consultation
- Clearly defined HSE Roles and Responsibilities
- Hazard Identification (Risk Assessment, Daily Start Task Instruction (DSTI), Job Safety Analysis (JSA))

Competence:

- Supervision – Suitably skilled, knowledgeable, trained and experienced personnel recruited
- Training – Includes third party mandatory HSE Training, in house HSE Training Modules (16 in total) and ECITB accredited Safety Passport training for all operatives, supervisors and management.

Compliance:

- HSE Management System (OHSAS 18001, ISO 14001)
- Incident investigation (Full Root Cause Analysis (RCA))
- Measuring performance (leading and lagging KPIs)
- Internal and external audits (Client, Consultant, Internal and External). In addition, both sub-contractors and suppliers on the preferred supplier list are audited to ensure compliance with ANCG standards

In turn these key elements are supported by the following procedures

- See it, Sort it (SI2): This is the Al Naboodah safety awareness campaign and is an integral part of ANCG's accident reduction programme. It aims to facilitate health and safety awareness by all employees through a proactive, enthusiastic and blame free culture, reinforcing behaviours that enhance and sustain a safe working environment with the message that "whoever you are, your PERSONAL action will make a difference". The campaign is communicated to all clients, ANCG personnel, sub-contractors and stakeholders from the very start of a project through mandatory Safety Inductions. All personnel are encouraged that if they see an unsafe act or condition they should report it immediately through the SI2 system, even if they have taken steps to rectify the situation, as

there may be valuable lessons to be learnt from it. Personnel are rewarded and recognised for their contributions at monthly award ceremonies

- Personal Safety Contracts: Supporting the SI2 awareness campaign, all ANCG Senior Managers will have signed a “Personal Safety Contract” outlining their individual commitment to Health and Safety and setting their annual HSE objectives. They each conduct one “Senior Management Safety Tour” per quarter.

- Senior Management Safety Tours: The Senior Management Safety Tour is a key element of our Health & Safety strategy. The visible commitment of senior management in undertaking the tours and the information obtained from them provides us with a valuable measure of our safety culture as we strive towards our goal of “Zero Accidents Every Day”. In addition to detailed feedback, the tour provides an important opportunity for senior management to meet both project staff and members of our supply chain and to engage in constructive dialogue. Visibility of senior management and communication of key issues are matters that are frequently mentioned positively in responses to polls and surveys throughout the business. Effectively conducted safety tours are a proactive and constructive mechanism that addresses all these points.

- Weekly PM HSE Tours – Each week Project Managers conduct a dedicated HSE inspection of their project. This visible leadership of Health & Safety is vital in ensuring that we achieve our targets.

- Site Safety Committees – See below

- Training (Internal and External) - Includes third party mandatory HSE Training, in house HSE Training Modules (16 in total) and ECITB accredited Safety Passport training for all operatives, supervisors and management.

Safety is everybody's business!

- b) Have you established occupational health and safety committees, and if so, do these have worker participation?

We have HSE initiatives and activities which are planned and carried out with the operations teams. Most of the ideas for these initiatives come from our employees and the site safety committees. From an ANGE Board perspective a Sustainability Committee has been set up which deals with, inter alia, Health and Safety issues. Worker participation is a key element in ensuring that we provide adequate and effective HSE equipment, training and other resources at site. Recently workers have been involved in the following trials:

- PPE – Safety boots

- PPE – Safety gloves

- Oral Rehydration Solutions (ORS) – Taste tests conducted to ensure workers liked the taste of the product bought before purchase. 3 different products were tested at various Projects throughout the group

- d) What measures do you have in place to protect workers from high temperatures during the summer months? How do you communicate these measures to the workers?

In line with Ministry of Labour rules midday breaks are given to all the employees working in the sun or in open spaces from 12.30 pm to 3.00 pm for the period 15th June to 15th September. The HSE team along with the Operations team takes steps to ensure proper precautions to protect employees from heat injury and heat related occupational hazards that may occur during the summer time. Summer working plans are formulated, approved by Senior Management and communicated at the relevant sites. These plans include training on heat stress, signs and symptoms and treatment of heat related cases, provision of cold rooms at site, provision of Oral Rehydration Solutions (ORS), provision of air conditioned rest areas for personnel resting on site.

The summer time working instructions are communicated through an internal memo in major languages as well as through Tool box talks

5. **Conditions of employment:** Please describe your company's policies and practice on each of the items listed below.

Where applicable, please include information on how you monitor and enforce these policies in direct operations and in contracts with business partners.

- a) Contracts - ensuring they are in a language the worker understands and are not modified upon the worker's arrival in the UAE

As per the current UAE Labour Law, all of our employment contracts are provided to workers in a language that they are able to understand. We ensure that no modifications happen upon arrival into the country.

- b) Full and timely payment of wages, including issuing of bank cards for workers

In line with the legal regulations we pay all wages and other benefits on time through the Wage Protection System and these payments are made through a financial institution. All our employees are issued with an ATM card or C3 bank card and they have access to ATMs at our labour camps.

- c) Issuing ID and health cards for workers

All employees are issued with Health Insurance cards to ensure access to medical treatment at all times within the UAE, in line with the laws of the respective Emirates

- d) Ensuring adequate worker accommodation

Our worker accommodation not only complies with local regulations but exceeds them and has been commended by government officials visiting our facilities. We not only ensure that the worker's stay is comfortable but also ensure that they eat good food and have access to recreational and medical facilities. We provide different kitchens catering to the taste of employees based on their country of origin (for example, Bangladeshi, Pakistani, N. Indian, S.Indian and so on).

We encourage constant feedback to continuously improve on our existing provision and we have regular meetings with our employees and take corrective action on the feedback when possible. In addition to the above our workers enjoy:

- Free medical check-ups – BMI, cholesterol, blood pressure.
- Free eye check-ups.
- Free dental check-ups.
- Cardiac check-ups for over 45s to coincide with World Heart Day
- Cricket teams and league participation (along with senior management)
- Talent competitions – singing and dancing.
- Games evenings.
- Free Wi-fi at the labour camps
- Free day outings to another Emirate to enjoy a day out in different surroundings
- Access to an onsite gym.
- Activities on sustainability to coincide with our Sustainability Week.
- Monthly buffet.
- Coming soon – an IT room with access to laptops
- Annual party with music, dancing, games and prizes.
- ATM and grocery store on site.
- Camp open forum – monthly.
- Special food festivals – region wise.
- Celebration of regional festivals – songs & dances.
- Free laundry facility
- Friday / holiday trip to city market.
- Mid-week transportation provided to fruit & veg market.
- Transportation for sick employees to the hospital.
- Airport drop off for employees going on leave.
- Isolation and first aid facility.
- Clinic at camp.

e) Passport retention - ensuring workers can store passports in a safe place and have access
 Our employee's passports are stored in a safe and secured place, according to the employee's preference, and this is available to them 24/7 in case of any eventuality.

f) Allowing workers to transfer employers within the country
 ANCG always ensures the growth of the employee. Both skilled and unskilled workers are given access to training so that they can develop and progress in their career internally. However, as per UAE law, employees have the freedom to change jobs after completion of 6 months, and as a responsible organisation we honour all legal mandates.

6. Recruitment agencies:

a) What process does your company employ to recruit migrant workers?

Our manpower resources are recruited through reliable and approved recruitment agents (in case of outside the country recruitment) or directly from the local market or through references.

- b) Which recruitment agencies does your company regularly work with to hire workers? *Please list names and contact details of the recruitment agencies.*

We are an organisation with a long history and over a period of time we have tested several recruitment agents for their professional reliability, integrity, quality and time bound delivery. These agencies' performance is reviewed at regular intervals and any agency found to be deficient in service is removed from our preferred list.

- c) Does your company take steps to ensure that the recruiting agencies it deals with do not charge recruiting or placement fees? If workers have been charged fees, does the company compensate them for this expense on arrival in their position?

We have two systems of recruitment when it comes to recruitment through an agency. One, we pay the agency a placement fee as well as other expenses as mandated by the local government rules and second, the candidate pays expenses for completing the formalities as per local regulations. This amount being paid to meet the expenses is also limited and controlled and we normally obtain feedback from the employees and in case of any violation of our terms of recruitment the agency is penalised and removed from our preferred list.

- d) Does your company require business partners to comply with the above recruitment procedures?

We have a strong and knowledgeable team in-house which manages the whole recruitment process. They have several checks in place which ensure our process is robust and effective. This is demonstrated through the quality and quantity of the employees we hire. This is related to third parties that we deal with.

7. Grievance/remedy:

- a) Does your company have a grievance mechanism that is accessible to workers employed by you or working indirectly for you via business partners, in their own language?

We have an employee relations team who are professionally qualified and speak different languages so that they can communicate freely with employees. And to support this, there is a grievance redressal procedure in the organisation which has been published and communicated internally to all employees. In addition to the procedure we hold regular monthly toolbox talks that encourage employees to air any grievances

- b) How do you ensure that workers are aware of its existence?

As mentioned in the point 7(a)

- c) How do you ensure that workers do not face retaliation from supervisors or others for raising grievances?

Our employee relations team visit the sites and discusses one to one with employees any grievances and problems and we see the issues raised in the site meetings are addressed. Any issues raised against a superior are taken with the respective department/ business head and HR team ensures that the complainant is not victimised

- d) What processes do you have in place to address and remedy grievances?

As mentioned in the point 7(a) & (c)

8. Freedom of association:

- a) Does your company have organizational-level policies and procedures in place on freedom of association for workers?

Local law prevents workers from forming trade unions but ANCG takes good care of its employees and we encourage feedback by way of meetings, surveys or established forums and ensure we are one of the best organisations to work for.

- b) How does your company implement such policies in a context where local law restricts the ability of migrant workers to form or join trade unions, such as in the UAE?

We are a law abiding corporate entity and we do all activities as per or within the ambit of law.

9. Public engagement:

- a) Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in the UAE?

Mr. Colin Timmons, Chief Executive Officer, Al Naboodah Construction Group
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- b) Who should be contacted if workers or civil society groups have questions or concerns about your company's UAE operations? Please provide contact information.

Emma Seymour, HR Director, Al Naboodah Construction Group, +9714 2019855

10. Engagement with the Emirati government:

- a) How does the company work with the UAE government to improve enforcement of the labour law in areas such as passport and fee retention?

We are an Emirati company with a long heritage in the region and as such we do anything we can to help the government improve its laws and rules by participating in relevant think tanks, workshops and conferences. We abide by applicable laws and hence have very minor litigation issues with employees considering the size of our Group.

- b) Has your company engaged with the UAE government about elements of the "kafala" sponsorship system that restrict workers' ability to change jobs or leave the country?

Employees have the freedom to work for the employer of their choice within the boundaries of the UAE labour law.

- 11. Challenges:** Please describe any challenges your company is encountering in the areas described above.

We are satisfied that the government of the UAE constantly improves on the laws governing the employment and welfare of workers. We have the best laws and systems in the GCC and this makes the UAE a country of choice for the ease of doing business or for the purpose of employment

Further information and guidance:

[OECD Guidelines for Multinational Enterprises](#)

[UN Guiding Principles on Business and Human Rights](#)

