

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.

Ethics Charter

<http://www.tavconstruction.com/career.aspx#code-of-ethics>

TAV Construction defines Ethics Charter as the rules and principles that all executives and employees are obligated to comply with in order to generate value to its stakeholders and to enhance its corporate value. With this charter hereby, it is aimed to ensure that TAV Construction executives and employees display high standards of conduct, that they are aware of the impact of their conduct and attitudes on the Company, that the stakeholders employ the best methods and display highly qualified behaviours. TAV Construction ethics policy consist of the following elements;

- Preventing Conflict of Interests, Protecting the Company Interests
- Compliance with Legislation and Regulations
- Compliance with Confidentially Requirements
- Responsibility to Declare Personal Information and Revisions, Prohibition of Working in Another Job
- Responsibility to Be Careful in Conduct, Relationships and Performance of Duties
- Compliance with Occupational Health and Safety Rules
- Compliance with the Principle of Non-discrimination
- Compliance with the Principles of Loyalty, Fairness and Integrity
- Compliance with the Principles of Fair Competition

Occupational Health, Safety and Environmental Policy

<http://www.tavconstruction.com/about-us.aspx#hse>

TAV Construction believes that its success depends on its approach, which emphasizes the necessity of continual improvement of the quality, environment, occupational health and safety systems and its HSE policy consist of the following elements:

- The description of the "job" in TAV Construction is the performance of jobs in a way which is efficient, high quality, sensitive to nature, safe and healthy. Therefore employees and subcontractors are encouraged to adopt the goal of "zero accidents" as a way of life
- It is committed to complying with the employers' requirements, with applicable local and international legal requirements and with other HSE requirements

- A safe working environment shall be provided for our employees, subcontractors and visitors. It is expected that they will maintain standards exert the utmost efforts to improve upon them
- HSE trainings and awareness of employees and subcontractors shall be provided to increase their competency and promote their participation
- An effective communication line shall be established with all related parties.
- To ensure the protection of the environment, health, safety and security of all employees, all required resources shall be provided
- Occupational health and safety risks and environmental impacts for all processes and activities shall be identified and managed by taking required measures to prevent pollution, injury and ill health
- Minimizing the use of natural resources and waste during the entire design, procurement, construction, and commissioning phases of projects is a primary goal
- An environmentally friendly work methodology shall be adopted by keeping in mind that all activities have an environmental impact
- The execution of the occupational health, safety and environmental management system shall be monitored and measured to improve the effectiveness of HSE management systems

- 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).

TAV Construction started its operations in the United Arab Emirates in 2003 with the Emirates Engineering Center Hangars Steel Roof Construction which was also the first international project of TAV Construction. Since 2003, TAV Construction brought its valuable know-how and expertise to the Emirates and has reached 4.3 billion US Dollars total contract value.

TAV Construction is currently engaged in one of the largest terminal projects of the region and also its largest current contract; the Midfield Terminal at Abu Dhabi International Airport. The Midfield Terminal is an important component of the Abu Dhabi 2030 Vision, which aims to ensure the sustainable growth of Abu Dhabi as a business and tourism center. Once completed the Midfield Terminal will be the largest building in Abu Dhabi, and one of the region's most architecturally impressive structures. It will have 700,000 square meters of internal space and will be visible from a mile away. The project is constructed by a Joint Ventures consisting in TAV Construction (leader of the Joint Ventures), CCC and Arabtec.

Besides aviation sector, TAV Construction is also involved in building projects in Dubai, mainly super-tall towers and iconic buildings. The 50 storey Majestic Tower, 76 storey Majestic Tower, 29 storey Emirates Financial Towers, Times Square Shopping Center and Towheed Iranian School were completed in the previous years. The 101 storey Marina-101 Hotel and Residences reaching a height of 425 meters and the 64 storey Damac Towers by Paramount are the company's ongoing projects. The Damac Towers by Paramount is a cluster of four towers connected by a shared podium and will rise to 279 meters in the skyline of Dubai.

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

2,858 TAV Construction employees, 4,931 Joint Ventures partner employees and 16,040 subcontractor employees are working in our UAE projects and branches.

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?

TAV Construction top management is committed to provide a safe working place and environment by establishing, developing, maintaining and implementing Health and Safety Management systems that comply with all UAE and international Health and Safety laws and requirements. TAV Construction is maintaining at all times the workplaces, equipment, devices and systems so that they remain safe to ensure all employees are returning to their homes and families safely.

TAV Construction believes that its success depends on the approach of continuous improvement culture of the quality, the environment, the occupational health and safety systems and of its policy. Employees and subcontractors are encouraged to adopt the "Zero Accident" culture as a way of life to protect workers, works and the environment.

The TAV Construction Occupational Health and Safety Management System has been certified since 2010 to OHSAS 18001:2007 by the international certification body Bureau Veritas (the certificate has been renewed continually since 2010 and is currently valid until 2019).

To ensure the protection of the health, safety and security of the employees, all necessary resources are provided. Occupational health and safety awareness through training, seminars, meeting, workshops and bulletin boards are created and improved for all the project's and subcontractors' staff. Occupational health and safety risks for all activities are identified; measures are taken to decrease the risks as much as reasonably practical.

The performance of the occupational health and safety management system is monitored and measured continuously through audits and inspections to prevent losses and to protect the health of the employees.

A key element in ensuring competency is the assessment of experienced personnel supplemented by extensive and on-going training. The project policy is that all personnel associated with the project, at all locations, undergo a mandatory induction, to ensure they are aware of the aims and requirements of the project and the plan for Health and Safety Execution. Emphasis shall be placed on the Zero Accidents Philosophy from the outset of the project.

TAV Construction ensures acceptance by employees of truth that all accidents can be prevented and all incidents including near misses should be reported for the improvement of Health and Safety performance. The commitment to careful reporting and investigation of accidents / incidents is a major factor in accident prevention. The accident investigation process provides the accurate information needed to prevent recurrences.

The Project Management review meetings are conducted regularly (at least twice a year) to determine the effectiveness and stability of the Health and Safety Management System. Opportunities for improvement or changes that may be required to the Health and Safety MS are identified, including policies and objectives.

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

TAV Construction established occupational health and safety committees in all projects. The committees consist of representatives from HSE Department, HR and Admin Department, Camp Boss, Camp Management, workers representatives. The worker representatives have the role of “ambassadors” between the Project Management and the workers, communicating their issues and concerns and agreeing on solutions for the best interest of the group.

Camp committee meetings are being conducted almost on monthly basis, with workers representatives to address the following issues and concerns:

- Health, Safety
- Maintenance
- Security
- Code of Conduct
- Drug and alcohol
- Recreational activities and facilities
- Transportation to/from the camp/outside
- working hours
- Food quality and hygiene
- Religious Services
- Rooms
- Toilet and sanitary issues
- and other welfare issues that may arise by workers representative.

Toolbox meetings are also held on weekly basis at site to increase the professional knowledge as well as the familiarization with the scope of works by supervisors or foremen. It has various topics (Working at height, fall prevention, lifting and rigging etc.) and two way communications between workers and site management is encouraged.

In addition subcontractors HSE meetings are conducted on a weekly basis with all HSE Teams of TAV Construction and all Subcontractors.

Bi-weekly HSE meetings with Clients and Consultants are also in practice to confirm to Clients that TAV Construction is complying with the regulations and standards to ensure workers Health and Safety.

c) How many accidents and fatalities have taken place on site in the last two years?

2014; Lost Time Injury Frequency (LTIFR*) was **0.004**, and no fatal accident happened.

2015; Lost Time Injury Frequency (LTIFR) was **0.009**, and no fatal accident happened.

** LTIFR = (Number of LTI x 200,000) / Total man-hours worked*

- 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?

TAV Construction conducts awareness campaigns for working in summer.

On a yearly basis the summer work campaign includes (but is not limited to) the following:

- Stop work under sunlight from 12:30PM to 3:00 PM from 15 June till 15 September as per UAE Labor Law
- Shaded Rest areas: Provide rest areas with air conditions/fan.
- Breaks: Schedule frequent rest periods with water breaks in shaded rest areas.
- Training: Train workers and supervisors about the hazards leading to heat stress and ways to prevent them.
- Acclimatization: Allow workers to get used to hot environments by gradually increasing exposure over a 3 to 5 days work period. Begin with 50% of the normal workload and time spent in the hot environment and then gradually build up to 100% by the fifth day. New workers and those returning from an absence of two weeks or more should have a 5-day adjustment period.
- Monitor weather: Reports daily & reschedule jobs with high heat exposure to cooler times.
- Heat Stress Awareness Posters and signs: Awareness Heat Stress Safety posters and signs should be placed in all areas onsite.
- Toolbox talk: Weekly HSE toolbox talks shall cover Heat Stress topics.
- Rest Shelters with Large Cooling Fans: Large cooling fans shall be placed in all worksite rest shelters for labors to aid in the cooling down process when using the rest shelter.
- Thermos/Igloo Water Coolers: water coolers should be placed on visible locations onsite and cover all areas to provide cool drinking water for all employees. These coolers shall repeatedly fill through the day by dedicated drinking water tankers.
- Personal Water Bottles: Any employee who does not bring his water bottle to work will not be allowed to work. Employees must also have their water bottle at the physical work location at all times.
- Heat Stress Cooling Cabin: Cooling cabin should be located next to the site clinic to be used by site labors when they feel overheated. Cooling cabin shall be monitored to ensure that labors cool down and drink cool water and return back to work and that no further actions are needed, if further treatment is needed, then the labor shall be moved to the clinic for medical review.
- JSTI: All Job Safety Task Instructions for all job tasks during the summer months (June to October) must address heat stress hazards daily for all site employees.

All these activities and actions are being communicated to labors directly in their languages through the training sessions, JSTI, Posters.

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

All the initial interviews and selection steps in the country or origin are conducted in the workers language. If and when possible TAV Construction sends representatives (usually engineers) of the same nationality as the candidates to conduct these interviews.

Accordingly all the workers are explained their rights, roles, responsibilities as well as the job offer details in their own language. When selected a worker is offered to sign his job offer in three languages: English, Arabic and his own local language.

- b) Full and timely payment of wages, including issuing of bank cards for workers.
Once the workers join the project, they are assisted by TAV Construction HR and Admin Teams to open a bank account that is being used to transfer workers' salaries.
Workers receive their salaries according to their contracts and actual timesheets. All the workers have bank cards and the wage payment system is fully connected with the government authorities.
- c) Issuing ID and health cards for workers
Issuing ID cards and health cards for all employees is mandatory in the UAE. TAV Construction have contracts with local health insurance providers for all staff and workers that cover most hospitals, clinics, and pharmacies in all the UAE. Emirates ID cards are issued in close coordination with local authorities.
All work sites include first aid facilities available 24/7 with doctors, nurses and usually one ambulance. First aid rooms and/or clinics are also available 24/7 at camps with doctors and nurses. In some cases an ambulance is also available at the camp. All expenses related to medical care provided to an employee at site or at the camp, through the available resources, are born by the Project site, with no expense to the employee.
For all other medical treatment or expenses, provided outside the sites or the camps, workers are covered by the medical insurance package mentioned above.
- d) Ensuring adequate worker accommodation
A Camp accommodation which is designed as per the UAE laws and regulations (the UAE federal law "Cabinet Decision Number 13/2009) is provided for all workers by TAV Construction. Each room and all facilities are being inspected by the Municipality, Health Department and Ministry of Labour regularly, i.e. monthly. Moreover, frequent inspections are conducted by Admin and HSE departments to ensure the camp meets the requirements at all times.
- e) Passport retention - ensuring workers can store passports in a safe place and have access.
All the passports are kept in a safe place which is accessible in emergency cases. This is a protection measure against potential theft.
At any time workers can have access to their personal documents upon written request. This is the case in particular in case of submission of a resignation letter or a leave form.
- f) Allowing workers to transfer employers within the country.
All workers may resign at any time.

6. Recruitment agencies:

- a) What process does your company employ to recruit migrant workers?
TAV Construction works with different recruitment agencies in the UAE. The first step of the recruitment process is to provide one of these agencies with the recruitment request including number of recruitments, position, qualifications, salary and benefits. The agency is also provided with all the official and required documents needed for their recruitment counterparts (local recruitment agencies) in the

country(ies) the recruitment will be processed. These counterparts are required to provide their trade licence and all governmental permits evidencing their legal ability to handle recruitment.

According to the above the recruitment agency supervises the initiation of job advertisement in the local country(ies), the collection of applications and the first short-listing of candidates.

Once sufficient candidates are identified representative of TAV Construction are sent to the related country to conduct interviews and final selection in skill test locations. These locations are open to public and any kind of government inspections.

A selected candidate is offered to sign a three-language Job Offer in English, Arabic and in the candidate local language, in three original copies: for the employer, for the employee and a third copy that will be submitted by TAV Construction to the UAE authorities for the issuance of the work permit and the resident Visa.

Upon issuance the individual work permits and Visas are provided to the UAE recruitment agency which will then finalise the impatriation of each worker in the UAE.

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

TRANSGUARD : +971 4 703 0500

ADVANCED MANAGEMENT : +971 4 3858590

FRIENDS INTERNATIONAL GROUP : +971-2-6289408

- 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?

Taking recruitment fee from workers is illegal in the UAE. We are working with reputable agencies only. Yet we have never received any complaints from our workers.

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

All our business partners (subcontractors, suppliers and JV partners) must bring all labours to the country legally. All companies in the UAE have to comply with the same procedures and laws related to worker recruitment. Before any worker can enter our construction site, irrespective of the party he is employed by, he must have valid UAE residence visa, work permit and insurance. All these documents are checked while health & safety inductions are conducted. Should any worker lack one of these documents he is not allowed to access the site and the employing party is informed and requested to complete the related procedures.

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?

Yes we have a grievance mechanism. Every worker is working under a chargehand and a foremen. All the chargehands and most of the foremen speak same language as the workers. They have direct contacts with them for any kind of grievance. In addition to this, they can contact the timekeepers on site who have direct contacts with the HR department. Furthermore, there are toolbox meetings every

morning on site, where workers have the opportunity to raise any issue. In addition to this, in the accommodations we have the camp management ready to listen and record all kinds of grievance.

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

Site timekeepers and HR department are in touch with the workers and their foremen all the time. In toolbox meetings also workers are being informed about the procedures regularly.

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

Workers have direct access to indicate their grievances to the HR and Admin department, to their chief Engineers, to the HSE department and to the project management all the time.

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

Please refer to the answer under 7 / a.

8. Freedom of association:

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

TAV Construction and all its business partners abide by the UAE laws and regulations, which in this case restrict the freedom of associations for workers.

However TAV Construction believes that a constant dialogue between management and the workforce is a key component to the success of its operations. This dialogue is organised at the project site level, on a daily basis where direct communication is promoted, and through the various site committees or regular meetings attended by workers or by their representatives.

- 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?

All workers are given the opportunity to share any of their concerns through the various and regular meetings organised at site or at the worker accommodation. These meetings are primarily focused on Health & safety matters but they also include Human Resources and Administrative representatives who can address wider considerations and observations.

In particular Camp committee meetings are being conducted almost on monthly basis, with workers representatives to address the following issues and concerns:

- Health, Safety
- Maintenance
- Security
- Code of Conduct
- Drug and alcohol
- Recreational activities and facilities
- Transportation to/from the camp/outside
- working hours
- Food quality and hygiene

- Religious Services
- Rooms
- Toilet and sanitary issues
- and other welfare issues that may arise by workers representative.

9. Public engagement:

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

[Project Director, HR and Administration teams.](#)

- 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.

[TAV Construction Dubai HR Manager – Ismail Aktan: +971 4 359 3233](#)

[TAV Construction Abu Dhabi HR Manager – Aydın Ozkaynak: +971 56 319 0682](#)

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?

[UAE Officials visit our offices on a regular basis and we exchange views.](#)

- 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?

[No we don't have such restrictions. Any worker may leave the company or the country. In such case a resignation letter is requested and upon submission all transfer and/or release documents are provided.](#)

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

[TAV Construction is an international contractor that is or has been working in 12 different countries so far. The size of our projects, the volume of the workforce at our work sites and the specificities of every country's laws and regulations bring major challenges that TAV Construction is used to addressing every day. The implementation of our policies and standards and the related reporting tools, especially when it comes to Occupational Health & Safety, is a must in all our projects as early as possible. All the necessary adjustments are made at the project level, in every country, to reach that goal. This expertise, supported by our track record, forms part of the added value we offer to our Clients, who usually expect such high international standards for their construction projects.](#)

Further information and guidance:

[OECD Guidelines for Multinational Enterprises](#)

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