

Questions for construction companies regarding working conditions in Qatar

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

- 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.

Creating a safe and healthy working environment is fundamental to Interserve, and to ensure that this is achieved we operate a number of policies which cover human rights and our social responsibility. These apply throughout our businesses, including internationally and are publically available through the below link:

<http://www.interserve.com/about-us/policies>

We also have an ambitious Sustainability Plan, which has been developed through to 2020. It is founded on our vision – to redefine the future for people and places, shaped by our values and aimed at delivering five sustainable outcomes. Our latest Sustainability Progress Report can be accessed through the below link:

http://www.interserve.com/docs/default-source/default-document-library/sustainability-reports/sustainabilities-report-2016.pdf?sfvrsn=6?utm_source=law&utm_medium=blog-tim&utm_campaign=sustainability-report-2015

Over the last year, we have reviewed and updated our policies in response to the UK Modern Slavery Act. This has included completing an assessment of procedures, supervision / monitoring and relevant controls, training and competence of staff to recognise and respond to issues, reporting and MI to demonstrate progress and incident response mechanisms.

- 2. Scope of operations:** Please describe the nature and scope of your company's operations in Qatar.

Interserve has three associate companies which operate in Qatar, and are all governed by the high health, safety and sustainability standards we have set ourselves, including employee welfare.

Gulf Contracting Company was established in 1976 and is one of Qatar's foremost construction companies, offering general contracting together with a range of specialist services, including Spacemaker (prefabrication), Bionest (waste water treatment), Interspace (interior fit-out, design and build) and Al Manjara (joinery).

How United Services was established in 2000 and has grown in reputation for quality and expertise operating across the spectrum of building services within a construction environment. How United Services also offer ongoing post construction support in facilities management and maintenance.

Madina Group was formed in 1997 and is a leading provider of specialist services in the oil, gas and petrochemicals field and related industries. The Madina Group has proved highly effective in mechanical engineering, fabrication and safety consultancy.

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

Our direct employee numbers in Qatar, have remained relatively static over the last year and at the end of September 2016, were 10,182 (Gulf Contracting: 7,472, How United Services: 1,122 & Madina Group: 1,588), with a further 5,800 sub-contractor employees working on our sites.

4. Health and safety: In direct operations and in contracts with business partners:

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

We are committed to developing a proactive safety culture across the full range of our activities and aim to ensure that none of our employees, contractors, or the people who interface with our operations, become injured or are made unwell by the way we carry out our work.

Our Deputy Managing Director, Andy Beaney, is appointed as the Interserve International Board member responsible for health and safety across the region and is supported by dedicated health and safety professionals in each of our businesses to drive continual improvement.

Our health and safety management systems are accredited to OHSAS 18001, which is the internationally recognised standard for occupational health and safety management and they are externally audited. These systems are specific to each business and operation and provide appropriate guidance to deal with the range of risks encountered by our employees.

Our 'Aim to be Accident Free' campaign, is one of our behavioural change programmes aimed at changing attitudes towards safety. This is supported by local campaigns such as 'Make Safety Personal' in our Gulf Contracting business. As part of this, over the last year our Mobile Safety Training Unit has continued to be used to provide training to more than 100 employees every day.



Our Reward & Recognition programme has continued to go from strength to strength whereby awards are made to highlight achievements and celebrate individuals and teams, who are most effectively embedding health and safety, sustainability principles and our values into their day to day operations. Over 150 nominations have again been made so far this year in Qatar. The programme will culminate in the Group Awards ceremony at the end of the year hosted by the Chief Executive of Interserve Plc.

We operate a prequalification process for our subcontractors / suppliers which covers sustainability, health and safety, welfare, employment practices and management and supervision. Failure to reach an acceptable score would result in the subcontractor / supplier not prequalifying as would non-compliance with any items noted as mandatory.

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

We operate health and safety committees at our sites across all of our businesses in Qatar, in addition to having senior management review meetings. The health and safety committee at sites is typically chaired by the Project Manager and meets monthly. Attendees include the site health and safety representative and employee representatives for the site. The committees focus on interaction and obtaining employee feedback as to where improvements could be made. We also operate suggestion schemes whereby employees are encouraged to provide ideas for improvement and raise any health and safety concerns that they may have.

Furthermore, we operate committees at our employee villages. Resident employees are represented in these committees, which focus on employee welfare and safety. We have also developed a health and wellbeing programme, as part of which we have employed healthcare professionals and conducted health assessments of our employees. These identified a number of long-term conditions, which the individuals were unaware of and we've developed and implemented a programme of treatment for them. In addition, we have developed a programme of sporting activities and nutritional awareness campaigns.

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

The below table shows the health and safety performance of our businesses in Qatar over the last two years (the Lost Time Incident Frequency Rate is calculated as the number of lost time incidents divided by the total number of man hours worked multiplied by 1,000,000):

Company	2016 YTD			2015		
	Lost Time Incident Frequency Rate	Fatalities	Accidents	Lost Time Incident Frequency Rate	Fatalities	Accidents
Gulf Contracting	0.44	1	15	0.83	0	31
How United	1.45	0	2	0.60	0	2
Madina Group	0.12	0	2	0.69	0	6

The performance of our businesses and sites is continuously monitored, with detailed monthly health and safety reports produced for review by our Interserve International Board. With regret, our Gulf Contracting business had a fatality of a subcontractor employee earlier this year, which was caused by limited compliance with the safe working procedure. Detailed recommended corrective and preventative actions have been developed and implemented as a result of this incident.

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?

During the summer months, we operate summer working hours with each location developing a summer working plan. These detail changes to shift patterns, including no outside work taking place in the middle of the day. Specific measures are communicated to employees via daily briefings, supplemented by training and toolbox talks on topics such as heat stress. In addition, air conditioned areas and rehydration drinks are provided for employees during break times. Management visits and supervisor checks are also increased during this period.

5. Conditions of employment: Please describe the company's policies and practice on:

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

The contracts that we provide for our direct employees are bilingual (in English and Arabic), in addition to this we will always explain to our employees about the terms and conditions in the language which is understandable to them. With regard to our sub-contractors, as part of our worker welfare procedure which we have developed over the last year, they are required to prequalify against a questionnaire on their approach to employee welfare and that of their supply chain, which includes questions relating to contracts. We are continuing to work with our sub-contractors to determine where improvements can be made and are undertaking audits against the questionnaire to ensure compliance and that contracts are not modified upon employees arrival in Qatar. As a result of this approach some of our supply chain have been removed from our approved lists and we are working with others on improvement plans.

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

We ensure that our employees are paid on time in line with their contract and Qatar Labour Law. We also issue bank cards to all of our workers.

We require that our sub-contractors pay their employees in a timely manner and are undertaking both audits and worker engagements to ensure that this is the case.

- c) Issuing ID and health cards for workers

We issue all of our employees with a Qatar ID card and health insurance cards to ensure access to healthcare arrangements in Qatar. We have also asked our sub-contractors to ensure that adequate access to healthcare is provided for their employees and are undertaking audits in this regard.

- d) Ensuring adequate worker accommodation

We are committed to providing consistent high standards of accommodation facilities, which have been developed as part of our Health and Wellbeing strategy. To ensure that the standards are maintained and sharing of best practice between our facilities, regular management visits take place. By way of example, as part of our Sustainability Forum, a number of senior managers from across the business visited one of our employee villages in Qatar to have dinner with residents and conduct a tour, which included bedrooms, kitchens and messes catering for different nationalities (including a diabetic kitchen), recreation facilities, laundry service facilities, the clinic and health consultation services, the waste water treatment plant and the plant nursery and planting programme to 'green' the accommodation grounds. As part of this visit, employees were briefed on aspects of our Sustainability Plan, including our health and wellbeing programme, and feedback was invited from resident employees on the accommodation facilities provided – all of which was positive.

Where accommodation is provided by our sub-contractors for their employees, we undertake audits to ensure that suitable accommodation is provided.

Government officials also visit our accommodation facilities to ensure that compliance is achieved, and we have received positive feedback on our standards.

Over the last year, we have developed our Worker Welfare Procedure to ensure we have an efficient, healthy and satisfied work force both within our business and supply chain, encompassing the provision of high standards of accommodation facilities.

As part of this Worker Welfare Procedure our businesses follow a defined audit plan so that accommodation facilities are regularly audited to ensure that the standards we set are maintained. The audit plan can cover our own accommodation facilities and those of our supply chain with a defined 'Employee Accommodation Inspection Report' template to enable

audits to be benchmarked and identify areas of good practice or highlight potential shortcomings.

We have also implemented a Worker Engagement template for use at sites or as part of audits of accommodation facilities to help validate our supply chain recruitment and employment practices. These are undertaken as a discussion with questions being asked in the native language of the worker.

e) Passport retention - ensuring workers can store passports in a safe place and have access

Employees have the right to retain their own passport, however we will often store passports for our employees for safe keeping and ensure that this is in a fire proof place. In these cases, employees write to us requesting that we store their passport for them. They can collect their passport as and when required. In other cases, employees store their own passport. We also expect that our sub-contractors allow their employees to access their passports readily and are undertaking both audits and worker engagements in this regard.

f) Allowing workers to transfer employers within the country

At present visas cannot by law be transferred to other employers, however at the discretion of our local partners and in line with stipulations within our contracts of employment, we will provide NOCs allowing qualified employees to transfer employers within the country.

g) Issuing of exit permits for workers who wish to leave the country

We will issue exit permits for workers as and when required by employees.

6. Recruitment agencies:

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

We recruit through approved recruitment agencies only, who we send the requirements to in advance and follow up with face to face interviews at the locations of potential candidates.

b) Which recruitment agencies does your company regularly work with to hire workers?

We have a number of preferred recruitment agencies who we work with regularly. We have assessed them to ensure they meet our requirements and that they comply with Qatar Labour Law.

c) Does the 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?

Our position is that we will pay any recruiting or placement fees to recruiting agencies, and are taking steps to ensure that employees do not pay these. By way of example, in recent recruitment from Kenya our Gulf Contracting business has managed to ensure that recruitment fees are not paid by the employee.

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

We expect our business partners to implement similar recruitment procedures and are conducting both audits and worker engagements to validate their recruitment and employment practices.

7. Grievance/remedy:

a) Does the 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 a Grievance Procedure and a Whistleblowing Policy, as part of which mechanisms and communication channels have been established to report concerns and seek advice.

We also operate employee welfare committees at our accommodation facilities and ensure access is provided to employee welfare officers.

Over the last year, as part of our Worker Welfare Procedure, we have introduced a worker engagement process, which provides additional opportunities for employees or those working indirectly for us via business partners to raise any concerns that they may have.

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

As above

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

We have a 'Business Practices – Conducting Business with Interserve' Policy which sets out the behaviour that is expected of both our employees and our business partners. Our values (Everyone has a voice, Take pride in what you do, Do the right thing and Bring better to life) underpin this and are a critical code of behaviour for us.

As part of our Whistleblowing Policy, if requested all reasonable steps are taken to protect anonymity and any act of retaliation against a whistle-blowing employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

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

All grievances reported are investigated, with the individual being advised of the results of the investigation as well as any corrective actions being taken.

8. Freedom of association:

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

b) How does the 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 Qatar?

As highlighted previously, we operate a number of committees in our businesses in Qatar such as on site health and safety committees and employee welfare committees at our accommodation facilities which provide the opportunity for our employees to raise any concerns and suggest improvements. Each of our businesses also participates in an annual

employee survey which provides valuable feedback on areas which could be improved – following the completion of which each business develops an action plan to address the issues raised.

9. Public engagement:

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

- Grahame McCaig – Group General Manager, Gulf Contracting and How United Services
- Jon Rokk – General Manager, Madina LLC

b) Who should be contacted if workers or civil society groups have questions or concerns about your company's Qatar operations? Please provide contact information.

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10. Engagement with Qatari government:

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

b) Has the company engaged with the Qatari government about elements of the “kafala” sponsorship system that restrict workers’ ability to change jobs or leave the country?

We engage with our stakeholders to drive improvements in social responsibility, human rights and employee welfare both internally and externally. Over the last year, an example of this has been working with the Chartered Institute of Building in Qatar to produce a paper on ‘Building a fairer system: tackling modern slavery in construction supply chains.’

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

Further information and guidance:

[OECD Guidelines for Multinational Enterprises](#)

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