

OHL (2016) Company response

Following publication of our briefing paper - [*A Wall of Silence: The Construction Sector's Response to Migrant Rights in Qatar and the UAE*](#) - OHL sent a response to the survey based on their former operations in Qatar.

Business & Human Rights Resource Centre contacted OHL in May 2015, and the company ceased operations in Qatar in 2016.

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

Yes we are following the internal policies (Code of Ethics and others) and the 10 Principles of the Global Compact (UN), as OHL Group is a founding member of the Global Compact's Spanish Network since its foundation (2004).

<http://www.ohlcompromiso.com/en/presentation/corporate-social-responsibility/initiatives-for-corporate-social-responsibility/>

The voluntary commitments assumed by OHL Group in Human Rights, Labor Practices, Environmental protection, corporate ethics and transparency have been driving force behind the creation of corporate policies available to staff.

<http://www.ohlcompromiso.com/en/code-of-ethics/code-of-ethics/>

<http://www.ohlcompromiso.com/en/presentation/corporate-social-responsibility/polices/>

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

OHL Construction ceased its activity in Qatar in 2016, after almost 9 years of operation. We build Sidra Hospital and were executing the Metro Stations.

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

Does not apply, since we left Qatar.

4. In direct operations and in contracts with business partners, what is your company's approach to ensuring workers' health & safety?

OHL has a Zero tolerance with incidents and maintaining a safe environment Policies. To accomplish this main objective, we have a HSS strategy based in two pillars: The H&S Audit and inspection monitoring of the sites and the Communication & Consultation to our workers. Training to all the workers is crucial in OHL sites.

5. In direct operations and in contracts with business partners, have you established occupational health and safety committees, and if so, do these have worker participation?

Yes. We already have established several OH&S Committees. From them, we have two weekly Construction Safety Coordination Meetings, with Subcontractor's H&S Managers, and Daily Toolbox Meetings with all the workers at all the sites.

6. In direct operations and in contracts with business partners, how many accidents and fatalities have taken place on site in the last two years?

In 2014 & 2015 there's been no fatalities in OHL's Job sites. In that period, with 6.569.112 Hours worked with an average number of workers of 900, we had only 1 worker Major Injury & 57 Minor cases, mainly First Aids, Heat related injuries or Minor Pollution.

8. Please describe your company's policies and practice on: Contracts - ensuring they are in a language the worker understands and are not modified upon the worker's arrival in the country.

Absolutely. All contracts were prepared within Qatar labour law limits and workers are made to understand and explained.

9. Please describe your company's policies and practice on: Full and timely payment of wages, including issuing of bank cards for workers.

OHL pays wages before end of every month. We always pay our employees on time.

11. Please describe your company's policies and practice on: Ensuring adequate worker accommodation.

We follow standard workers on housing policy and apply requirements upon standard. We make sure that our labors live in good conditions.

12. Please describe your company's policies and practice on: Passport retention - ensuring workers can store passports in a safe place and have access.

Our workers accommodation is been provided with a safe locker and workers have access to it. All workers have access to their passport under request.

13. Please describe your company's policies and practice on : Allowing workers to transfer employers within the country.

OHL received an earlier version of the survey (2015) that did not include this question.

14. Please describe your company's policies and practice on: Issuing of exit permits for workers who wish to leave the country.

Upon approval of leave from site, Exit permits are issued.

15. What process does your company employ to recruit migrant workers?

OHL follows the concerned county's embassy for relevant documentation and wages and ensures the ethical recruitment process is followed.

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

We were working with an agency for Filipino Workers (EDI-Staff Builders International, Tel. +63 2 8126704)and another one for For Nepal Workers (New Pathibhara Placement Services Tel. +974-55516312).

17. 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?

Yes, we make all candidates aware who are been selected that recruitment process is free of charge and workers don't have to pay any money to the Agencies. Similarly OHL strictly mention in the recruitment service agreement that Agency's cannot charge any money to the workers.

18. Does your company require business partners to comply with the above recruitment procedures?

Not applicable.

19. 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.

20. How do you ensure that workers are aware of its existence?

Yes we have dedicated staffs by means of Camp Manager for this purpose

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

In this case the workers will report to the Camp Manager.

22. What processes do you have in place to address and remedy grievances?

Once workers report to Camp Manager, this will be addressed to the Human Resources Department and required corrective action will be taken.

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

The OHL Group encourages and respects a right of association and collective negotiation in employment matters.

24. How does your company implement a freedom of association policy in a context where local law restricts the ability of migrant workers to form or join trade unions?

The company has implemented the appropriate communication channels to know the concerns of the workers and company management meet regularly with employee representatives to discuss work-related issues and any complaints or concerns of employees as may arise. (Internal self-assessment of compliance with human rights in the OHL Group campaign dec 2014- jan 2015).

25. Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in the country?

Human Resources Department.

26. Who should be contacted if workers or civil society groups have questions or concerns about your company's in-country operations? Please provide contact information.

Either Qatar Country Manager or HR Department, but as we have said before, we have left Qatar.

27. How does the company work with the country of operation's government to improve enforcement of the labour law in areas such as passport and fee retention?

No.

28. Has your company engaged with the country of operation's government about elements of the "kafala" sponsorship system that restrict workers' ability to change jobs or leave the country?

No.

29. Please describe any challenges your company is encountering in the areas described above.