

## Hotel companies in the Gulf: 20 questions on human rights

### Introduction to the survey

International standards on responsible business – including the OECD Guidelines on Multinational Enterprises and the UN Guiding Principles on Business and Human Rights – call on companies to have policies and systems in place to avoid, mitigate and remediate harmful impacts on people and the environment.

Spurred by the concerns of owners, investors, customers and civil society, the hotel industry has made great strides in integrating sustainability and due diligence into their operations. However in some jurisdictions key challenges remain.

The legislative environment and workforce composition in the Gulf States pose significant challenges for companies to protect their workforce from exploitation. The appalling working and living conditions faced by migrant workers have been well documented by the press and in NGO reports.

Companies can find themselves being inadvertently complicit in this abuse, which may have serious operational, legal, financial and reputational consequences. As international scrutiny of businesses increases in the lead up to the 2022 Qatar World Cup and World Expo 2020 in Dubai, responsible action from companies will help them to avoid these risks as well as contribute to rising standards of worker welfare.

The survey below asks a set of questions designed to understand what policies and processes hotel companies have in place to protect migrant workers in their operations in Dubai, UAE. We invite your participation in the spirit of transparency, shared learning and dissemination of good practice.

### Human rights

1. Does your company have a publicly available commitment to respect human rights? If so, please provide the link.

**YES**

<http://www.rezidor.com/phoenix.zhtml?c=205430&p=respprinciplespolicies>

<http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjY2OTkxENoaWxkSUQ9LTF8VHlwZT0z&t=1>

2. Does your company identify its salient human rights issues and does it have a due diligence process to manage them? (Key steps include: assessing actual and potential human rights risks, integrating and acting upon findings, tracking responses, and communicating how impacts are addressed).

**Rezidor endeavours to conduct its business operations in a manner that is protecting human rights and seeks to promote and enhance human rights within its sphere of influence.**

If so:

- are these assessments conducted at headquarter, regional, country and/or operational level?  
**Assessments are conducted at every level of our operations.**
- please list the issues identified and share a link to any accompanying public reporting by your company.

<http://www.rezidor.com/phoenix.zhtml?c=205430&p=respsustainabilityreports>

## Communicating human rights along the supply chain

1. How does the company use its leverage to influence business partners with regards to human rights policy and practices? (E.g. business partners: franchisees, building and hotel owners, hotel management companies etc.)

**Rezidor's Code of Business Ethics governs how we do business. It enables us to take positions on key issues of business ethics with a single voice. The code includes ten principles which guide us whenever an ethical decision needs to be made, and applies to every person who works for us and every one of our companies. A similar thought process applies to the suppliers, who are required to honor the supplier code of conduct.**

- what challenges does your company face in doing so?

**Control of the code happens at every level of our operations. Ethical control points within our operations are in place, however resources vary when it comes to suppliers and other 3<sup>rd</sup> parties.**

2. Does the company require third-party contractors to comply with the company's policies and standards? (E.g. third party-contractors: recruitment firms, labour suppliers and service providers).

If so:

- how are these policies communicated to third-party contractors and how is their compliance monitored and enforced?

**As per contract with Supplier Code of Conduct**

- what challenges does your company face in ensuring third-party compliance?

**No 3<sup>rd</sup> party control is currently carried out due to limited resources and lack of understanding of requirements at local level.**

3. What steps has the company taken to mitigate the human rights risks associated with the construction phase of hotel buildings?

**...tbc**

4. How does the company ensure that workers (including agency staff) are made aware of their labour rights and company labour policies in a language they understand?

**Code of Business Ethics is provided in local translations and available in 34 different languages. Posters with the code are available back of house for those not on a direct employee contract in our hotels.**

**We've launched a modern slavery toolkit in 2016 with the focus of raising awareness with all employees, agency workers and sub-contractors. Also here have we applied back of house posters to raise this awareness.**

**Additional to the back of house material we have a whistle-blower website available for any stakeholder of the Rezidor Hotel Group.**

## Business operations

5. Describe the scope and structure of your company's operations in Dubai.  
Please include information on:
- the number of hotels and rooms
  - the names of the hotels
  - the type and explanation of the business models they operate under (owned and operated; leased; managed properties; franchised properties; joint ventures; other).
  - the level of the company's responsibility for human rights under these various arrangements.

(Example table)

No.	Name of hotel	No. of rooms	Business model	Explanation of business model including level of responsibility for HR practice
1	Radisson Blu Hotel, Dubai Media City	246	Managed	<b>hotels managed by the Group under long term contracts with the hotel owner. GM, with responsibility of hotel HR practices reporting to Area Support Office for Middle East &amp; Turkey</b>
2	Radisson Blu Hotel, Dubai Deira Creek	276	Managed	
3	Radisson Blu Residence, Dubai Marina	152	Managed	
4	Park Inn by Radisson Hotel Apartments	90	Managed	
5	Park Inn by Radisson Hotel Apartments Al Rigga	149	Managed	

**The remaining questions apply specifically to migrant workers in the company's operations in Dubai.**

## Recruitment

6. What categories of workers are directly employed by the company?
- **Management, supervisory, line employees**
7. Please describe the company's recruitment process for workers that it hires directly.
- do you use recruitment firms to supply these workers? **yes**
  - does the company pay the charges and costs associated with recruitment (agency fees, travel costs, visas, medical checks) or are these costs paid by the worker? **Hotels pays charges where applicable.**
8. What categories of worker in the hotel are agency staff employed by a third party? (E.g. subcontractors, service providers or labour suppliers)
- **Mainly security employees**
  - what due diligence checks does the company undertake to ensure that these third-party agencies are operating legally and ethically?
  - **Subject to local law & legislation. To be identified in 2017.**

## Conditions of employment

What policies and processes does the company have in place to:

9. Prevent contract substitution?

(I.e. the process whereby the terms of reference in the contract the worker signs in their home country is different to that which they sign on arrival in the host country)

**Human Rights Policy**

**Human Rights Commitments**

**Employment Principles**

**No process in place**

10. Ensure workers are issued with and have access to all necessary documentation including their passports, IDs and medical cards, and that these documents are renewed on time?

**Subject to local law & legislation. More information available at Area level.**

11. Ensure timely and full payment of a wages?

Please include information on the company's policy and processes re:

- a. payment of minimum country-of-origin regulated salaries
- b. overtime pay
- c. equal pay for equal work regardless of nationality
- d. prevention of illegal deductions
- e. other pay related issues

**Subject to local law & legislation. More information available at Area level.**

12. Ensure the health and safety of its workers?

Please include information on the company's policies & processes re:

- a. health & safety training
- b. injury prevention
- c. maximum working hours and overtime
- d. non-discrimination
- e. prevention of physical, sexual and verbal abuse
- f. any other health and safety related issues covered by the company's policies & processes

**Rezidor developed and introduced a formula known as TRIC=S to localize our approach to safety and security. The role of corporate safety and security was shifting from a reactive and centralized command-and-control model to a more proactive, decentralized, and dynamic role. The change enabled safety and security to play a vital part in supporting our hotels.**

13. Issue transfer permits and exit visas?

**More information available at Area level.**

14. Please list any other labour-rights issues your company has identified in Dubai and the policies and processes in place to manage them.

**More information available at Area level.**

## Worker accommodation

15. Does the company provide accommodation for its employees? **YES**
- if using agency staff who provides their accommodation? **This varies per hotel**
- if employee or agency-staff accommodation is off site what checks are undertaken to ensure that all accommodation is of a decent standard? **More information available at Area level.**

## Grievance & remediation

16. What mechanisms does your company have in place to facilitate freedom of association and alternative forms of organizing in a context where local law restricts the ability of migrant workers to form or join trade unions?

**We recruit and employ individuals without regard to race, gender, age, disability, marital status, sexual preference, nationality, caste, affiliation with a political organization, national origin, veteran status, religious or union organization, minority group or any other characteristic protected by law.**

**More information available at Area level.**

17. Does your company have a grievance mechanism? If so, please describe the procedures in place to submit, process and remedy grievances.

**A key pillar of ethics in Rezidor is [www.rezidorethics.com](http://www.rezidorethics.com), a website run by an independent third-party organization – Ethics Point. Employees can use this site to find information on our Code of Business Ethics and report concerns anonymously.**

**Any employee with concerns or questions about the Code is encouraged to raise these directly with their supervisor or person of trust in the hotel or regional organization. If this is not possible, the employee can report the issue on [www.rezidorethics.com](http://www.rezidorethics.com). The site and hotline are available in 11 languages.**

18. What steps does the company have in place to remedy cases where:
- a. workers have been charged recruitment fees?
  - b. workers have not been paid on time or in full?
  - c. workers have been victims of discrimination, physical, verbal and/or sexual abuse?
  - d. workers have been threatened or faced retaliation for expressing grievances?

**Rezidor abides by the UN Global Compact's principles and follows them in our policies and procedures where possible. In 2016 we brought out a toolkit to raise awareness of modern slavery, specifically with outsourced labor. Back of House Material is provided to all hotels, which increases the awareness of the issue.**

**The HR teams of each of our hotels have been provided with tools to do checks and put in control points towards the prevention of any of the points mentioned above.**

**The Rezidor Hotel Group follows high standards and advocates socially and environmentally sustainable business practices. Our aim is to combat and eliminate any form of modern slavery and to operate of hotels free of child exploitation or forced, bonded, or compulsory labor. We apply this practice to both our operations and in our supply chain.**