

**2018 Questions for Hotel Companies in the UAE**  
***Migrant Worker Rights***

**RADISSON HOSPITALITY AB**

Radisson Hospitality AB, a member of The Radisson Hotel Group, acknowledges and respects the principles contained in the United Nations Declaration of Human Rights, which are consistent with Radisson's core values and commitment to be a force for good. Radisson Hospitality AB endeavors to conduct its business operations in a manner that seeks to promote and enhance human rights within its sphere of influence. This commitment is aligned with and supported by its Code of Business Ethics and the principles of the United Nations Global Compact, to which the group is a signatory since 2009.

Since 2010, Radisson Hospitality AB has been recognized as one of the World's Most Ethical Companies by the Ethisphere Institute, an independent think-tank and center of research promoting best practices in corporate ethics and governance.

Our aim is to bring a positive benefit to the communities in which we operate through high quality services, economic growth and employment, environmental protection and community involvement. Our commitment to ethical excellence is our heartbeat, and we are recognized as a trusted global leader when it comes to be a responsible business.

Radisson Hotel Group believes that the hospitality industry can be a force for good and make a positive contribution to tackle modern slavery and human trafficking. The Group is a member of the International Tourism Partnership (ITP), which provides a voice for environmental and social responsibility in the industry.

In 2017 ITP and its members announced their collective 2030 targets to impact critical issues. One of the 2030 targets is to raise awareness of human rights, embed human rights into corporate governance, and work collectively in the industry to address risks arising in the labor supply chain and during hotel construction.

ITP commits to driving positive change on respect for human rights and fostering safe and inclusive working environments. ITP commits to;

- Continue to raise awareness of human rights risks in the hotel industry and embed human rights requirements into the corporate governance of ITP members
- Work to address human rights risks in the labour supply chain, including elimination of fees charged to workers to secure employment
- Identify and develop tools to address human rights risks during the development and construction phase of hotels.

In June 2018, ITP and its members launched a set of Principles on Forced Labor for the global hotel industry on forced labor and human trafficking to counter such practices in recruitment and employment globally. These principles are:

1. Every worker should have freedom of movement
2. No worker should pay for a job
3. No worker should be indebted or coerced to work

## Scope of operations

1. Please describe the scope and structure of your company's operations in the UAE in the table below, including the business model each hotel operates under (owned and managed; leased; managed properties; franchised properties; joint ventures; other).

No.	Name of hotel
1	Park Inn by Radisson Abu Dhabi, Yas Island
2	Radisson Blu Hotel, Abu Dhabi Yas Island
3	Park Inn by Radisson Dubai Motor City
4	Radisson Blu Hotel, Dubai Deira Creek
5	Radisson Blu Residence, Dubai Silicon Oasis
6	Radisson Blu Hotel, Dubai Media City
7	Radisson Blu Residence, Dubai Marina
8	Radisson Blu Hotel, Dubai Waterfront
9	Radisson Blu Hotel Ajman
10	Radisson Blu Resort, Fujairah
11	Radisson Blu Resort, Sharjah

## Human rights and due diligence

2. Does your company have a publicly-available policy commitment to respect human rights in its operations and throughout its business relationships<sup>1</sup>, that addresses workers' rights? Please provide links or attachments to the company's relevant policies.

Radisson Hospitality AB endeavors 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. Radisson Hospitality AB is committed to maintaining a high standard of business ethics, honesty and integrity all reflected in our [Human Rights Policy](#) and [Human Rights Commitments](#).

3. Does the company have a human rights due diligence process for identifying and prioritizing workforce risks in its operations and throughout its business relationships in the UAE? If so, please explain this process and highlight the top three workforce risks relating to a) its direct operations and b) its value chains.

Radisson Hospitality AB has an EMEA wide approach, not region specific. Operational due diligence processes include that Every hotel undergoes an internal audit every second year. Elements of the audit include controlling background checks for all positions that are handling cash as a part of their role or in other sensitive positions. The background check must be done by an external company.

Other elements include supplier contract approval, work permits for employees of outsourced companies, reference checks of other partners of the supplier and background checks on outsourced employees in Accounting & Finance, Human Resources, Security, IT, Front Office and Food & Drinks.

Our aim is to combat and eliminate any form of modern slavery and operate free of slavery; exploitation of children; and forced, bonded and compulsory labor.

4. Does your company include labor practices relating to recruitment, working, and living conditions, as part of its due diligence criteria when deciding to enter into business relationships in the UAE?

Corporate recruitment standards are applied, and local labor standards are followed.

5. Does your company require hotel property owners and subcontractors in the UAE to comply with your human rights and other rights-related policies and procedures?

If yes:

- a) How do you hold them accountable to these requirements (e.g. through contract clauses, brand standards) and what mechanisms do you employ to monitor and evaluate their compliance?

Every supplier / subcontractor is required to follow the Supplier Code of Conduct. It must be adhered to by all suppliers on corporate and regional levels which becomes part of the suppliers' commitment. It's the hotel's responsibility and checked by area HR that processes are in place via HR audits.

If no:

- b) Does your company engage with its hotel property owners or subcontractors on issues related to their human rights practices (e.g. through workshops, training, audits)? Please provide details.

N/A

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<sup>1</sup> [According to the UN Guiding Principles on Business and Human Rights](#), the term "business relationships" encompasses business partners, entities in the company's value chain and any other State or non-State entity directly linked to its business operations, products or services. This includes entities in its supply chain beyond the first tier and indirect as well as direct business relationships. The business partners we are primarily interested in for the purposes of this survey are **hotel property owners, labour suppliers, and service providers**.

## Recruitment

6. If you directly employ workers, please describe your company's process for recruiting migrant workers to the UAE.

We follow processes as per UAE labor law.

7. Does your company have a publicly-available written policy to respect migrant workers' rights, that addresses the human rights risks they face during recruitment? Please explain how it applies to workers that are both directly employed and subcontracted at your hotels.

This is all reflected in our [Human Rights Policy](#) and [Human Rights Commitments](#) and put out to our suppliers / contracts via the Supplier Code of Conduct.

Please also include the following information:

- How does your company prevent the practice of contract substitution? Does your company have a policy of honoring the terms of contract signed in workers' home countries?
- If your company has a policy of no-fee recruitment, what steps does it take to ensure workers do not pay recruitment fees and related costs? How could you demonstrate that workers (both directly employed and subcontracted at your hotels) do not incur any fees?
- If your company has a policy of reimbursing fees, please describe the company's process for identifying incidences of worker-paid fees and reimbursing fees to workers (both directly employed and subcontracted at your hotels).
- What are the most common countries of origin of migrant workers operating in your directly employed and subcontracted workforce?

Mostly Pakistan, Indonesia, India, Sri Lanka. Philippines

## Payment & wages

8. What is your company's process for determining the wages of workers in the UAE, and what external benchmarks does it use to set wage levels (e.g. do nationalities play a role in determining salary scales, do you consider a living wage in setting wage amounts)? Please explain how these policies apply to workers who are both directly employed and subcontracted at your hotels.

This is done following an internal benchmark by the area HR office with the AON Hewitt benchmark. Glassdoor.com is also used and has been proved successful for more senior positions in the hospitality industry.

9. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are paid on time and in full, including for overtime and without illegal deductions? What steps does the company take when entities in its value chain fail to pay workers on time and in full?

We have corporate and area policies in place which are regularly checked during the HR audit. It also forms part of the controlling audit.

## Freedom of movement

10. How does your company ensure that workers (both directly employed and subcontracted at your hotels) have free and secure access to their passports, identity documents, and other valuables? What steps does the company take when entities in its value chain fail to ensure workers have sole, secure access to these personal items?

Radisson Hospitality AB is committed to combatting modern slavery, educating employees and encouraging its partners and the broader business community to take a stand against human trafficking. Therefore, Radisson Hospitality AB strives to achieve that:

- Every employee has a worker contract
- No employee is forced to work
- No employee is forced to hand over government issued identification, passports, work permits or bank cards
- No employee is required to pay any worker fees to receive work
- No excessive deductions are made from employees' wages

Unless authorized by an employee in writing, the hotels do not require passport / visa for safekeeping. If authorized by the employee, the passport is kept in the hotel safe, accessible for the employee at any time upon request.

11. How does your company ensure that workers (both directly employed and subcontracted at your hotels) are free to change jobs and/or leave the UAE at will and without penalty? What steps does the company take when entities in its value chain prevent workers from changing jobs and/or leaving the UAE at will?

Offering of fixed term contracts has been reduced and instead permanent contracts with notice period are offered. This requires a resignation in writing. The resignation can be done at any time. Previously there were restrictions by law, due to visa restrictions, but this has changed.

## Health & safety

13. Please describe your company's health & safety policy and procedures, including what steps the company takes to ensure that they are applied to workers (both directly employed and subcontracted at your hotels).

Areas covered may include, but are not limited to:

- health & safety training
- injury prevention
- maximum working hours per week and overtime
- sick leave
- non-discrimination
- prevention of physical, sexual and verbal abuse

Respect is the key to all our actions. Just like trust, respect is earned. [Our Code of Business Ethics](#) shows how we want to be perceived as a company.

Corporate Health & Safety policy is followed, which all employees are trained in as part of the New Hire Orientation Training and the Responsible Business Training. In many cases a separate Health & Safety Training is provided too. This is generally done by the Security Department, every six months.

## Living conditions

13. Please describe your company's standards for workers' living conditions both directly employed and subcontracted at your hotels).

Area standards are checked as part of the HR audit. Accommodation is provided in grades, depending on the employee's position.

14. How does your company ensure workers are provided with safe and decent accommodations, including safe transportation, and access to healthcare and financial services? What steps does the company take when entities in its value chain fail to house workers in adequate living conditions? Visits, audits?

Standard Operating Procedures are in place to ensure the employer is providing decent accommodation. Living conditions are audited as part of the HR audit and regular visits are done by the hotel.

## Workforce data

15. Does your company maintain public workforce data? If yes, please provide a link or attachment with the data.

Radisson Hospitality AB maintains the workforce data, however not in public domain.

If not, please provide information on the number of:

Employment type <sup>2</sup>	Total numbers of workers	Male	Female
Directly employed	79%	n/a	n/a
Employed by property owner / Employed by subcontractors (service providers) / Employed by subcontractors (labor suppliers)	21%	n/a	n/a

16. Please specify the typical activities conducted by your:

- a) Directly employed workforce
- b) Subcontracted workforce  
Housekeeping, Security, stewarding this can be different per hotel

*Examples: Reception, cleaning, security, maintenance, gardening, restaurant staff, management etc.*

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<sup>2</sup> Employees may be 1) directly employed workers with whom you have a contract of employment and to whom you pay wages; 2) workers employed by the entity that owns the hotel branch; 3) workers employed by subcontractors; 4) workers employed by labor supply/manpower agencies.

## Representation & remedy

17. Please indicate if the company has a global policy commitment on freedom of association and collective bargaining for workers in its direct and subcontracted workforce. If yes, please provide links or attachment to the relevant documents.

As part of Radisson Hospitality AB [Employment principles](#), we respect our employees' rights to freely join associations and organizations, and organize in unions and conclude collective bargaining agreements.

18. Given legal restrictions on freedom of association and membership of trade unions in the UAE, how does your company ensure workers' voices are represented and heard by the company, e.g. through worker-representative committees? Please describe the mechanism in place.

Hotels have the possibility to setup a Joint Consultative Committee, which is being rolled out as part of the area HR plan.

19. In line with the UN Guiding Principles on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? How are workers made aware of this mechanism? Please provide a description of the company's grievance mechanism.

A cornerstone in the Code of Business Ethics implementation is [ethics.radissonhotels.com](http://ethics.radissonhotels.com), a website run by an independent third-party organization. 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 online. The site and hotline are available in eleven languages for all employees, outsourced employees and agency workers.

20. How many grievances were raised in 2017 by workers (both directly employed and subcontracted at your hotels)? Please provide a summary of the grievances and the remedial actions that were taken by the company and its subcontractors, and whether follow up actions were taken to check if workers were satisfied with the outcome.

In 2017 Radisson Hospitality AB received 74 reports.

## Other information

21. Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the Gulf region, including any challenges it faces in doing so?

Radisson Hospitality AB engaged specialized Human Rights consultant Verité to create a hotel self-assessment tool. This self-assessment questionnaire (SAQ) is designed to identify potential gaps and vulnerabilities in business processes of hotel properties and third-party intermediaries that provide services related to the recruitment, selection, hiring, transportation, training, and management of foreign workers that could indicate a risk of forced labor or human trafficking.

As part of the process, the SAQ was tested in 3 of our hotels in the Middle East. This SAQ is intended to gather information on risks of forced labor and human trafficking that hotels may be facing, and ultimately to help hotels and its third-party intermediaries detect, remediate and mitigate risks of labor abuse.

ITP is currently engaging with key stakeholders in the Middle-East to work on human rights in hospitality in the region. In October 2018, ITP and some of its working group members, including Radisson Hotel Group, participated in a roundtable with the International Labor Organisation (ILO), Institute for Human Rights and Business (IHRB), and the Qatari Chamber of Commerce and Industry to discuss recent labor law reforms in Qatar. ITP is also proactively scoping out collaborative projects for members to participate in as a pilot on ethical recruitment between south-east Asia (e.g. Bangladesh, India, Nepal) and in 1-2 countries in the Middle East (Qatar and UAE).