



**"The ugly side of the beautiful game":  
exploitation of migrant workers on a Qatar 2022  
World Cup site"**

**All correspondences from the Qatar government, organisations and companies in relation to the abuse of migrant workers on Khalifa International Stadium and Aspire Zone. Some of the names of organisations and selected attachments listing individuals have been removed. Either because they do not feature in the report, or to protect the individuals' identities.**

Dear Mr Lynch,

Thank you for your letter dated March 09, 2016.

Labour reform is a complex issue, especially in a nation with a small indigenous population and a far larger population of guest workers. We trust that you have observed in your previous visits to Qatar that our government takes the issues of labour rights and human rights very seriously and is committed to the on-going, systematic reform of our labour practices.

We work with a range of agencies and stakeholders throughout Qatar, including the Supreme Committee for Delivery and Legacy, to combat cases of non-compliance. Systems and processes are in place to ensure stakeholders are able to inform us of any critical labour situations or concerns that occur on major projects within Qatar.

In general, the questions detailed in your letter relate to alleged abuses of the rights of workers employed by individual companies involved in the construction of World Cup sites, and the companies' various sub-contractors. All of these companies are required to obey Qatari laws with regard to their labour practices.

New laws have recently been enacted – and significant efforts have been made to strengthen the enforcement of these laws – in an effort to protect the labour rights and human rights of Qatar's expatriate labour force.

As a reminder:

- In October 2015, His Highness the Emir Sheikh Tamim bin Hamad Al-Thani issued sweeping reforms of the nation's entry, exit and residency requirements. Once enacted, the new laws will enable greater freedom of movement and will enable workers to submit exit permit requests directly to the Ministry of Interior if a dispute with their employer occurs.
- To ensure workers are paid in full and on time, the Government introduced the Wage Protection System in November 2015. The initiative compels all private companies in Qatar to open bank accounts for their employees and to transfer wages electronically. This system aims to eradicate the construction industries' cash-in-hand culture that puts workers at risk throughout the world.
- The Government is also taking significant steps to protect workers from exploitation as part of the recruitment process. In 2015, these measures included conducting over 1,800 inspections of recruitment agencies in Qatar to ensure they are not charging fees to workers. To prevent malicious recruitment practices in the workers' home countries, Qatar continues to cooperate with various other governments, and has so far signed bilateral agreements with 35 countries of origin.
- New laws and measures have been introduced to restrict working hours during the summer months and to ensure workers are in full possession of their passports. In May 2014 the Government announced a steep hike in fines for anyone found guilty of withholding employee passports to 25,000 Qatar Riyal. In addition, we have also introduced new laws mandating that all worker accommodation must have safe, lockable storage for residents to keep their personal documents.
- Of course, we also appreciate that these laws require enforcement, which is why we have hired 375 labour inspectors to investigate housing and working conditions. In 2015 this highly trained team was able to carry out over 56,000 inspections, resulting in 923 companies being banned from doing business in Qatar.

We believe these reforms demonstrate that Qatar is working hard to improve the lives of its guest workers and that steady progress is being made. Our goal is to create a legacy of improved conditions for workers in Qatar and to set the standard for both labour rights and human rights in the Gulf region. To that end, we are well aware that our efforts are a work-in-progress, and we appreciate the efforts Amnesty and other NGOs are making to help us identify areas for further improvement.

Sincerely,

Ministry of Foreign Affairs – Qatar

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Zurich, 17 March 2016

### **Letter from Amnesty International on working conditions on a 2022 FIFA World Cup site and the surrounding Aspire Zone**

Dear Audrey Gaughran,

We hereby confirm receipt of your letter, dated 4 March 2015, on investigations carried out by Amnesty International on working conditions at a FIFA World Cup site, namely the Khalifa International Stadium construction site, as well as at green spaces surrounding that site in the wider Aspire Zone.

We thank you for bringing these important issues to our attention. We take them very seriously and acknowledge our responsibility to ensure human rights are respected in the context of preparing for and carrying out the tournament. As the clearest example for this and as part of the FIFA reform process, FIFA has added a dedicated article explicitly expressing its respect for human rights to its Statutes (Article 3).

On the ground in Qatar, over the past few years FIFA has built up a strong working relationship with the Supreme Committee for Delivery and Legacy (Supreme Committee), the government entity responsible for delivery of all FIFA World Cup infrastructure. As enshrined in their Workers' Welfare Charter, the Supreme Committee is fully aligned with FIFA in its commitment to ensure that the human rights of workers on all FIFA World Cup sites in Qatar are respected.

FIFA is following and examining the work being done by the Supreme Committee and working closely with the relevant representatives to ensure continuous improvements. In our opinion, the current structures and processes put in place by the Supreme Committee provide a good foundation to ensure the respect of the human rights of workers at FIFA World Cup sites:

- The Supreme Committee's Workers' Welfare Standards in place since February 2014, were described by Amnesty International as "key protections... on health and safety, employment, working and living conditions, the provision of grievance mechanisms, training and other issues...". These standards entail mandatory requirements for all contractors and sub-contractors working on FIFA World Cup sites. The second version of the standards, finalised in February 2016 and now publically available on the Supreme Committee's website, have

- been further developed and improved with the technical support of various experts and NGOs working on this topic in the region and internationally.
- The Workers' Welfare Standards are integrated into the Supreme Committee's tender processes and by December 2015, 18 tenderers of a total of 68 were disqualified specifically for workers' welfare. Reasons for disqualification included the proposed worker accommodation, which is inspected by the Supreme Committee during the tendering process, not meeting minimum levels of compliance.
  - A 4-tier auditing system made up of monthly self-audits by contractors, ad hoc Supreme Committee audits to validate the self-audits, independent third party audits, and audits by the Ministry of Administrative Development, Labour & Social Affairs.
  - An IT audit tool was launched on 23 February 2016 to support the Supreme Committee in monitoring the implementation of the Workers' Welfare Standards by contractors and measure the levels of improvement.

Independently of the Amnesty International investigation, and given the requirements set out in the Workers' Welfare Standards and the implementation of the 4-tier auditing system by the Supreme Committee, contracted companies took a number of concrete measures to improve the working conditions specifically at the Khalifa International Stadium in 2015. These included:

- Relocation to new accommodation as well as renovation and upgrading of existing accommodation for approximately 500 workers to meet the Workers' Welfare Standards.
- Review of payment records during audits of companies contracted by the Supreme Committee with no evidence of delayed payments found.
- Three contracted companies set up forums that meet on a monthly basis at which workers can voice their grievances through worker representatives with corrective action being taken as applicable.

These improvements also had positive ramifications, whereby, for example, contracted companies improved the accommodation for all of their employees and not just those working on Supreme Committee contracts. This is also true for the green spaces in the Aspire Zone, which are mentioned in your letter as being part of "the Khalifa stadium project" although these spaces are not contractually part of the FIFA World Cup site. The company contracted by the Aspire Zone Foundation for the maintenance of green spaces, Nakheel Landscapes, was subsequently contracted by the Supreme Committee in June 2015 for a FIFA World Cup project. As a direct result of a Supreme Committee audit, and before the results of your investigation were shared with relevant stakeholders, 140 workers were relocated to newly built accommodation which has an improved level of compliance to the Supreme Committee's Workers' Welfare Standards from where they were previously staying. By the end of the first quarter of 2016, Nakheel plans to have all 4'000 of its employees relocated to the same accommodation facility, called Labour City, thus greatly increasing the positive impact of the Workers' Welfare Standards on workers regardless of whether they work on a FIFA World Cup site.

Furthermore, one of the many improvements that are part of the second edition of its Workers' Welfare Standards, is the mandatory requirement for all workers to be in possession of their personal documents, such as their passports, and to have a personal safe in their rooms for secure storage.

While constructive criticism is necessary and, in many cases, helpful, it is also important to acknowledge progress and improvements, such as the achievements of the Supreme Committee to date. Such balanced communication and description of the facts can help raise awareness and show

other sport organisations, event organisers and construction project owners how to establish processes to ensure that the human rights of workers are respected in similar contexts. We have always said in the past that such a complex matter requires the constructive approach, engagement and involvement from different stakeholders and support of a wide array of stakeholders, including the large enterprises and corporations that operate and/or have construction projects in Qatar, the countries in which such enterprises are domiciled as well as the workers' countries of origin, bearing in mind that the protection of workers' rights has to be addressed consistently and comprehensively in the entire lifecycle of the process, i.e. from recruitment to repatriation. We regret that such acknowledgement is largely absent in the letter sent to FIFA.

Furthermore, we do not agree with the statement in your letter that "FIFA took no clear, concrete action to prevent human rights abuses of workers on World Cup-related projects". FIFA has been integrating human rights components in different aspects of its work, processes and activities for many years, not least through the 2014 and 2018 FIFA World Cup Sustainability Strategies. Already in 2011, the FIFA President committed to integrate labour rights explicitly into the bidding and hosting documents for future FIFA World Cups, starting with the next possible edition in 2026. This is being done through an in-depth review of the bidding and hosting requirements and processes, following guidance from the UNGP framework in order to put in place the best possible safeguards for human rights. In this revision, FIFA has so far received technical assistance from the United Nations Office of the High Commissioner for Human Rights as well as further input from the international human rights expert, Professor John Ruggie. Further input from other stakeholders will be collected in the coming months.

For the 2022 FIFA World Cup, and since 2011, FIFA's top management have met with the highest authorities in Qatar and other key stakeholders, such as ITUC, BWI, Human Rights Watch, a series of political institutions and governmental authorities and also with your organisation, Amnesty International, to discuss how best to cooperate and address human rights issues in Qatar. Today, despite being in the midst of the preparations for the 2018 FIFA World Cup in Russia, even more time and resources are being dedicated by the FIFA administration to address the human rights risks related to the 2022 FIFA World Cup given the salience of the topic and the increasing number of workers at FIFA World Cup sites. Throughout 2015, the number of people working at FIFA World Cup construction sites grew from approximately 2'000 to 4'000 workers. This number is expected to rise to approximately 36'000 workers in the next two years. Therefore, it is crucial that FIFA is involved in overseeing the work on the ground and is therefore in the process of formalising its human rights due diligence process.

In addition to preliminary meetings and inspection visits of constructions sites and worker accommodation, FIFA set up a 2022 FIFA World Cup Sustainability Working Group together with the Supreme Committee and the now recently established Local Organising Committee. The first meeting was held in November 2015, with two meetings scheduled for 2016. FIFA also participated in the stakeholder engagement process for the revision of the second edition of the Workers' Welfare Standards in January 2016.

FIFA has just launched a recruitment process for a full-time Human Rights Manager to be based at its headquarters in Zurich and dedicated to this topic. The process to recruit the head of the Local Organising Team Sustainability Department, will also start soon and will mean additional human resource support locally in Qatar.

As shown by the steps outlined above, and while FIFA cannot and indeed does not have the responsibility to solve all the societal problems in a host country of a FIFA World Cup, FIFA has taken "concrete action" and is fully committed to do its utmost to ensure that human rights are respected on all FIFA World Cup sites and operations and services directly related to the FIFA World Cup.

Nevertheless, and in order to have a positive impact beyond FIFA's direct responsibility and make the most of the potential that the FIFA World Cup has to be a strong catalyst for improving working conditions in the host country and perhaps even in the region, we strongly encourage all relevant stakeholders, including the Qatari authorities, to collaborate in order to ensure that best practice standards, such as the Supreme Committee's Workers' Welfare Standards, increasingly and urgently become the benchmark for all construction projects in Qatar.

We are fully aware that the greatest risks of human rights violations tend to occur at the lowest levels of the supply chain, beneath multiple layers of sub-sub-contractors. This decentralisation and fragmentation is a challenge faced by the global construction industry and we believe it can only be tackled through a multi-stakeholder approach from various angles. In this regard, as mentioned to Amnesty International in a recent telephone conversation with Mr Mustafa Qadri, we would like to receive any input and recommendations your organisation and other experts may have, directly and in a timely manner.

Although not mentioned in your letter to FIFA, it is our understanding that the investigations took place from February to May 2015. FIFA and indeed many other stakeholders with the responsibility and influence to put a stop to any possible abuses were only informed between December 2015 and March 2016. While we understand that this was due to the need to validate information, in our opinion, it would be much more effective if Amnesty International would share its concerns in a more timely manner in order to be able to work together to resolve any issues as quickly as possible and in the best interest of those whose human rights are at risk.

We very much look forward to a closer collaboration and communication with Amnesty International moving forward, in order to better ensure together the protection of human rights of workers on FIFA World Cup sites.

Yours sincerely,

FIFA



Federico Addiechi  
Head of Sustainability



اللجنة العليا  
للمشروعات والمرافق  
Supreme Committee  
for Delivery & Legacy

25/01/2016



Ms. Meghna Abraham  
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Dear Ms. Abraham,

**RE: Amnesty International Letter (7 January 2016) Detailing February/March 2015 Labour Interviews**

The Supreme Committee for Delivery & Legacy (SC) acknowledges receipt of your detailed letter dated 7 January 2016 Ref: TC MDE 22/2015.001, concerning workers conditions that are working on the refurbishment of Khalifa International Stadium (KIS) from early 2015, and would like to inform you that we have called for an immediate comprehensive review of the application and enforcement of the SC's Workers' Welfare Standards (WW Standards) amongst all contractors, sub-contractors and labour supply companies operating at KIS.

It is important to begin by thanking you for bringing these important issues to our attention. The SC has always stressed the important role that organisations such as Amnesty International (AI) have in supporting and assisting us in this area, provided that a collaborative and pragmatic approach is taken. I would also like to reiterate the point we communicated to you during our meeting in London on 20 January, that although we appreciate AI bringing these serious allegations to our attention, we are concerned as to why it took AI over eight months to raise these issues with us. The information that AI held in its possession would have helped accelerate our shared goal of improving worker conditions. In the meeting you stated that the reason for the delay in sharing your findings as being due to validation of the information and concern for the well-being and safety of the workers interviewed. Whilst we appreciate these stated reasons, we nevertheless believe in a spirit of partnership and cooperation in order to achieve our common goals. With this in mind, we would like to urge AI in its future efforts and reports to adopt a more balanced and transparent approach.

By AI's own admission, the SC is making substantial progress in the enhancement of its labour standards and policies, and had we both been more closely engaged over the last year, AI would have been aware of the positive changes that have taken place over that period. AI would have also noted that the SC was working on enhancing and rectifying many of the issues raised, even before receipt of your letter.

We have always recognised and acknowledged that any sustainable change requires significant effort and time and the SC's Worker Welfare Unit (WWU) will continue working and engaging with all contractors, sub-contractors and labour supply companies as we have done to date to ensure that the WW Standards are enforced – not only on our construction sites but also extended to the likes of service providers, security services, and cleaning companies, for example within the SC corporate offices.

*The Acknowledged Benefits of the Supreme Committee's Workers Welfare Standards*

Addressing labour issues on a series of projects on the scale of the SC's World Cup construction programme requires attention both to the substantive standards imposed on project contractors, and on the inspection and enforcement regime by which those substantive standards are administered. On the former, the SC's efforts cannot be undermined, and AI itself has described the WW Standards as "key protections . . . on health and safety, employment, working and living conditions, the provision of grievance mechanisms, training and other issues . . ." The SC notes with encouragement that AI's letters to the various sub-contractors acknowledges that the majority of workers interviewed apparently wish to remain in Qatar, provided that the SC's WW Standards are adequately observed and enforced. SC is not only pleased, but also proud of the endorsement echoed by the workers themselves. Our hope is that the WW Standards will serve as a benchmark for government-sponsored projects in the region and around the world.

In light of this, we would like to highlight some of the positive changes that have taken place over the last period, as a direct result of the WW Standards:

- In the period between the AI interviews and your letter to the SC, workers for Eversendai Engineering have been relocated to Barwa Al Baraha accommodation, a new purpose-built labour facility that consist of low-rise apartment buildings and amenities (100% of workers employed to work on Aspire/SC projects). The relocation was a direct result of inspections against the WW Standards carried out by the main contractors for whom Eversendai is engaged. These inspections pre-dated AI's February 2015 AI interviews. The Eversendai employees were relocated in April 2015.
- In the same period, a large number of workers for Nakheel Landscaping have been relocated to the new Labour City accommodation, with over 1,100 Nakheel employees transferring since October 2015 and the remainder of Nakheel's employees to be moved in first quarter 2016. This will directly benefit Nakheel's approximately 4,000 employees, although only 140 are directly engaged on SC/Aspire projects. The move was a direct result of an SC audit on Nakheel in June 2015.
- The SC has reviewed pay practices and records from several of the sub-contractors identified in your letter, and our preliminary assessment is that wage payments have been made in a timely manner for the covered period (second half of 2015). Moreover, the Government has recently introduced a Wage Protection System (WPS) that will ensure timely payment of salaries, and for our part we will continue to audit payment records as appropriate, as part of our audits and compliance monitoring.
- Midmac and Six Construct (MSJV) have launched separate monthly 'Workers Welfare Forum' (WWF) within their respective accommodations, allowing any of their workers at KIS to raise grievances and request assistance, free from reprisals. To date, Midmac has held seven WWF meetings and several grievances have been raised with appropriate corrective action being taken where necessary. Examples



include the workers' request for additional transport services, recreational facilities and better quality of food, which were all addressed.

- On 1 December 2015, Nakheel instituted a Workers' Consultation Procedure and held elections for the first representatives of its workers' forum. The forum is intended to address all worker concerns in the future. On 24 December, five workers were voted by their peers from 13 candidates through a formal election process which was a paid half-day to enable them to attend and vote. The first forum session is expected to take place in February 2016.

During the course of the year since your interviews, SC has taken major strides in the improvement of its own WW Standards regime. We are proud of the fact that implementation of our Standards has not only benefited those working directly on the World Cup programme but has also led to improvements for thousands of workers on other projects. The following sample list of achievements has occurred throughout the programme and demonstrates the effectiveness of our Standards in a short period of time:

- 120 inspections were conducted as part of the SC's WW tender inspection ad-hoc audit process. For the tender inspections, 18 companies failed to meet the WW requirements of the SC's Request for Proposal requirements, and were disqualified from the tender process. For ad-hoc audits, rectification plans were developed following the feedback report provided by the SC with active work undertaken to close out the rectification plan.
- In furtherance of the SC's own auditing programme (an additional layer above and beyond contractor internal audits), the SC has mandated that contractors and their sub-contractors develop and share a detailed WW Standards auditing schedule, both to assure that such audits are taking place and to help plan the SC's own unscheduled audit programme.
- HBK upgraded their accommodation during the enabling works contract for Al Wakrah which drove other companies living within the same accommodation to emulate the HBK conditions benefiting the remaining the 1,400 workers living on site. HBK is currently building new accommodation according to the WW Standards with a capacity of up to 4,000 beds.
- Bin Omran upgraded their entire workers accommodation to be in compliance with the WW Standards despite having a small number of workers on the SC Al Bayt Stadium Project. Additionally this upgraded accommodation is now housing the workers on the Al Rayyan temporary pitch project and other infrastructure projects.
- SC continued its social integration efforts by successfully organizing the fourth edition of the Workers' Cup, which involved 16 teams from various sectors of Qatar's economy. The fifth edition is due to commence on the 19 February.
- SC conducted direct meetings with sub-contractors on the 2014 Brazil Fan Zone project to explain and reinforce the importance of compliance with the SC's WW Standards on that project. This resulted in increased awareness of our Standards and resulted in improvements despite the short contract period of four weeks.

***Continued Enhancement of the Supreme Committee's Inspection and Enforcement Regime***

With respect to the latter point of a robust monitoring and enforcement programme, the SC – like many government-funded regulatory agencies worldwide – faces challenges in recruitment, training, and retention of a sufficient number of qualified inspectors to ensure that standards are fully enforced. These challenges have inevitably led us to, in a few cases, accept contractors who are not fully compliant but have potential to improve under an agreed rectification plan and monitoring mechanism. We are making important progress in the development and enhancement of our WW Standards inspection and enforcement regime, but we acknowledge that more can be done and are fully committed to this initiative.

Additionally, SC is working on several major initiatives, many of which are expected to greatly enhance the monitoring and enforcement programme. This includes:

- Development of an IT audit platform, an automated tool to enable the SC and its contractors to have a more accurate, streamlined and immediate insight into the implementation of the WW Standards expected to be released by the end of February 2016.
- Appointment of a 3rd party auditor by the end of March 2016, completing the four-tier audit system detailed in the WW Standards.
- Release of the 2nd Edition of the Standards by the end of February 2016, in consultation with FIFA and NGOs, including AI.
- Commencement of the SC Workers' Skills Training Centre, to provide the workers with enhanced skills and capabilities expected to be launched July 2016.
- Major enhancements to record-keeping and data capture.
- Enhanced coordination between the SC and the Ministry of Labour and Social Affairs.
- Working with partners to improve contractor audit programmes and reporting.
- Augmentation of the SC WW Standards inspection team headcount.

Details for the above go beyond the scope of this letter, however we would be happy to present the objectives, methodologies and timelines to these programmes to members of the AI team when convenient.

SC is encouraged by our progress on these and other developments during the course of 2015, and we look forward to executing on our plans for continued improvements this year. At the same time, we recognise fully that ensuring worker safeguards and the adherence to the WW Standards is an organic process of continual improvement, and we welcome constructive feedback and suggestions from our partners.

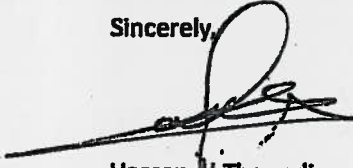
To reiterate the points shared during the meeting, the SC fully recognises our role and responsibility in the protection of worker welfare on World Cup-related projects. This recognition, and our dedication to producing infrastructure of which Qatar as a nation can be proud, formed the basis for our development and adoption of the WW Standards.

In light of this, SC respectfully rejects AI's statement that SC has 'failed'. We have always stated that time is required to continuously improve the situation, and we believe our core stakeholders will support us on this journey.

We are fully cognizant of the wider challenges that the global construction industry is facing due to the decentralisation of the labour force thus allowing several layers of sub-contractors to carry out most of the work. We are tackling this challenge head on by partnering with various organisations to identify ways to address this issue. We believe that it is only through an open and transparent approach that progress will be made for the betterment of the workers and the nation, thus ensuring substantial change in how workers' welfare is addressed in Qatar.

To close, as we mentioned, we would welcome specific, timely, and actionable information on specific instances of non-compliance, and we pledge to continue our efforts to enhance the welfare of workers involved on our projects. We also welcome constructive input on best practice administration and enforcement of the WW Standards, and look forward to working with you and other NGOs to identify ways to reestablish a collaborative and proactive relationship moving forward in our quest to establish a genuine social legacy of lasting worker welfare reform for the first Middle Eastern World Cup.

Sincerely,



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Secretary General



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21 February 2016

Dear Meghna Abraham,

**RE: ABUSE OF WORKERS ON KHALIFA STADIUM PROJECT**

Thank you for your letter dated 7 February 2016 Ref TC MDE 22/2015.003. We would also like to thank your colleagues Mustafa Qadri and Fabien Goa for taking the time to visit the Aspire Zone during Amnesty International's (AI) most recent visit to Doha (7-13 February) and meet some of my colleagues with whom I work with on the Khalifa International Stadium (KIS) refurbishment project on a daily basis.

As I stipulated in our first letter dated 4 January 2016, Aspire Zone Foundation (AZF) treats human and workers' rights very seriously and has applied the Supreme Committee for Delivery & Legacy's (SC) Workers' Welfare Standards (WW Standards) to its KIS refurbishment project to ensure that all workers are treated with respect and dignity.

I also stated in my first letter that after reading your serious allegations of abuse I called an immediate and comprehensive review of the application and enforcement of the SC's WW Standards amongst all contractors, sub-contractors and labour supply companies operating as part of the supply chain of the KIS refurbishment project. The findings from this ongoing investigation show that many of the issues you raised with contractors and sub-contractors had already been identified and rectified through AZF's ongoing work with the SC's Workers' Welfare Unit (WWU) in the intervening period between you undertaking your research and contacting us with the findings, demonstrating the efficacy of the SC's WW Standards and their enforcement.

These include:

- Eversendai Engineering relocated all employees engaged on the KIS project to Barwa Al Baraha accommodation, a new purpose-built labour facility that consists of low-rise accommodation buildings and amenities. The move was a direct result of inspections against the SC's WW Standards carried out by the main contractors for whom Eversendai is engaged. These inspections pre-dated the February 2015 AI interviews and the Eversendai employees moved in April 2015.



- In the same period, a large number of workers for Nakheel Landscaping were relocated to the new Labor City accommodation, with over 1,100 Nakheel employees transferring from October 2015 and the remainder of Nakheel's employees to be moved in first quarter 2016. This will directly benefit Nakheel's approximately 4,000 employees, although only 140 are directly engaged on AZF/SC projects.
- AZF has reviewed pay practices and records from several of the sub-contractors identified in your letter and our assessment is that wage payments have been made in a timely manner for the covered period. Moreover, the Government has recently introduced a Wage Protection System (WPS) that will ensure timely payment of salaries.
- Midmac and Sixco (MSJV) have launched separate monthly 'Workers' Welfare Forums' (WWF) within their respective accommodations, allowing any worker at KIS to raise grievances and request assistance without fear of reprisal. To date Midmac has held seven WWF meetings and several grievances have been raised and appropriate corrective action taken.
- On 1 December 2015, Nakheel introduced an 'Employee Consultation Procedure' (ECP) and held elections for the first representatives of its workers' forum. On the 24 December, five workers were voted by their peers out of 13 candidates through a formal election process which was a paid half-day to enable them to attend and vote. The first WW Forum session is expected to take place in late February 2016.

The improvements made on the KIS refurbishment project, amongst others, can be found in detail in the SC's Workers' Welfare Progress Report<sup>1</sup>, dated 9 February 2016. The improvements detailed in this report were made as part of AZF's ongoing monitoring, investigation and rectification programmes, which are in line with the SC's WW Standards and implemented and managed in conjunction with the SC's WWU, who continuously assess every contractor, sub-contractor and labour supply company working on a World Cup-project.

In the absence of the requested evidence detailing the specific instances of non-compliance, we have responded to the questions raised in your letter dated 7 February 2016 to the best of our ability.

**Companies working on the Khalifa International Stadium Project:**

- It is the responsibility of AZF, the SC and the main contractors to ensure that all sub-contractors and labour supply companies working on any project linked to the 2022 FIFA World Cup Qatar™ have the relevant documentation for any and all employees setting foot on a World Cup-project site, in line with the SC's WW Standards. AZF works with the SC to regularly audit all contractors and sub-contractors and they are mandated to conduct monthly self-audits to ensure all supporting documentation is up to date.

**How Aspire Zone Foundation or Aspire Logistics assess companies prior to entering into contracts:**

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<sup>1</sup> Supreme Committee for Deliver & Legacy Progress Report - February 9 2016 - <http://www.sc.qa/en/delivery-and-legacy/workers-welfare>



**ASPIRE  
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- There is clear and detailed tendering criteria included in the SC's WW Standards<sup>2</sup> stating that any contractor, sub-contractor or labour supply company must submit a Workers' Welfare Compliance Plan (WWCP) with its tender before it can be considered for the provision of goods and/or services on any 2022 FIFA World Cup Qatar™ project.

**Nakheel Landscapes:**

- Nakheel signed a contract with Aspire Logistics (AL) in July 2015 to establish a turf farm for the testing of turf for use in stadiums. Its existing agreement to maintain and develop green spaces at Aspire Zone (AZ) was not a project to which the SC's WW Standards applied. Immediately after Nakheel was awarded the turf farm project it began working with AZF and the SC's WWU to ensure compliance with the SC's WW Standards and since July Nakheel has made a number of improvements which have significantly improved the working and living conditions of their workforce. The progress Nakheel has made to date can be found in detail in the SC's recently launched Progress Report.

**Review of application and enforcement of the welfare standards:**

- **Passports:** Edition 1 of the SC's WW Standards requires that contractors must ensure that all workers have personal possession of their passports and other personal documents. However, as outlined in the first Semi-Annual Workers' Welfare Compliance Report<sup>3</sup> released in September 2014, following discussions with workers the SC discovered some workers were reluctant to keep their passports in their possession for reasons such as security and costs. As such, SC did accept the practice of passports being kept in a safe in the accommodation office, provided that workers voluntarily signed a consent form. However, the SC has accepted that this may still lead to abuse and so has stopped accepting this practice. Edition 2 of the WW Standards will still mandate that workers must have personal possession of their passports and other personal documents and will additionally require contractors to provide individual lockable storage to allow workers to safeguard their own documents. This requirement has already been implemented by many of AZF's contractors on KIS and both AZF and SC will continue to oversee and enforce this requirement to ensure that all workers on our projects have possession of their passports and other personal documents.
- **Accommodation:** As previously stated, since Nakheel signed an agreement with AL in July 2015, they have worked tirelessly with AZF and the SC's WWU to improve workers' welfare and have since relocated their entire workforce to new, SC WW Standards-compliant accommodation in Labour City, including the 1,200 employees that are not engaged on a World Cup-project. It has also set the goal of moving the majority of its 4,000-strong workforce to Labour City by the end of the first quarter of 2016.

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<sup>2</sup> Supreme Committee for Delivery & Legacy Workers' Welfare Standards <http://www.sc.qa/en/delivery-and-legacy/workers-welfare>

<sup>3</sup> Semi-Annual Workers' Welfare Compliance Report<sup>3</sup>, September 2014 <http://www.sc.qa/en/delivery-and-legacy/workers-welfare>



- In April 2015, Eversendai relocated their workforce to improved accommodation in Barwa Al Baraha. Seven Hills are not engaged on any World Cup-projects and have not been since early 2015.
- **Deceptive recruitment:** This is an area in which AZF, the SC and the State of Qatar continue to face challenges, due to the complex issues around governance and the recruitment of workers in their home countries. AZF is committed to working with its suppliers, the SC's WWU, NGOs and countries of labour sending origin to provide better education around this topic. Current measures in place to tackle deceptive recruitment include the SC's WW contractor self-audit check list, which all contractors working on the KIS refurbishment project are mandated to complete on a monthly basis and which contains a section on ethical recruitment. The full list of measures to tackle deceptive recruitment can be found in detail in the SC's recently launched Progress Report.

**No objection certificates and exit permits:**

- To date, our investigation has not uncovered a single case where an exit permit has not been granted to an employee engaged on the KIS refurbishment project wishing to leave the country. AZF would welcome any evidence in this instance to allow us to investigate this matter in its fullest.

AZF will be working hand-in-hand with the SC's WWU in the coming months as a number of positive initiatives are launched and rolled-out across all Work-Cup related project. These include the appointment of a third party monitor, completing the SC's four-tier audit system, the launch and implementation of a new IT audit platform, an automated tool to streamline the auditing process, and commencement of the SC's Workers' Skills Training Centre to provide workers with enhanced skills and capabilities. These are just a few of the positive steps AZF will be implementing across all of its World Cup-projects in 2016.

AZF recognises its role and responsibility regarding the protection of workers' welfare on World Cup-related projects and we are committed in our efforts as we work towards the betterment of workers and the nation.

As discussed in your meeting with my colleagues on 11 February 2016, AZF looks forward to a more open and collaborative working relationship moving forward.

Yours sincerely,

**Hilal Al Kuwari**  
President, Aspire Zone Foundation

**Ref TC MDE 22/2015.003**

Meghna Abraham  
Director for Global Thematic Issues  
Peter Benenson House  
1 Easton Street  
London  
WC1X 0DW  
United Kingdom

4 January 2016

Dear Meghna Abraham,

**RE: ABUSE OF WORKERS ON KHALIFA STADIUM PROJECT**

Thank you for your letter dated 21 December. We are deeply concerned to read your serious allegations of abuse including that of forced labour. Given the seriousness of these allegations, we will need to review any relevant evidence before commenting on specifics. In the absence thereof, we wholly deny abuse of workers on the Khalifa International Stadium (KIS) refurbishment project.

Aspire Zone Foundation (AZF) treats human and workers' rights very seriously. As set out in your letter, AZF applies the Supreme Committee for Delivery & Legacy's (SC) Workers' Welfare Standards (WW Standards) to its KIS refurbishment project.

Notwithstanding our denial, as an immediate action I have called a review of the application and enforcement of the WW Standards amongst all contractors, subcontractors and labour supply companies operating as part of the supply chain of the KIS refurbishment project.

It is worth noting that our initial investigations do not show widespread infringement of the WW Standards, conversely showing a dramatic improvement with regards to the welfare of the workforce employed by Nakheel Landscapes to undertake work for Aspire Logistics (AL) on the KIS refurbishment project. The SC and AL have worked in partnership with this specific contractor over the last six months and we would be more than happy to share an update as to the improvements made since Amnesty's initial investigation between February and May 2015, providing all the necessary documentation to demonstrate such progress.





**ASPIRE**  
ZONE

It is also important to note that, in the seven months that have passed since Amnesty's field research for this investigation concluded, the Government of Qatar has passed or, in the case of the Wage Protection System, begun enforcing legislation that addresses some of the short-fallings identified in your letter, namely: the late payment of wages (Law No.1 of 2015, amending Law No.14 of 2004 [the Labor Law]) and the denial of exit permits (Law No.21 of 2015, amending Law No.4 of 2009).

As we look to immediately address the additional issues and specific questions raised in your letter, I would be grateful if you could submit your evidence without delay so that we may investigate fully. I can assure you that no worker should fear reprisals nor will be penalised for sharing information.

We would also like an opportunity to meet with you and your researchers once you have submitted your detailed evidence to us, so that we may properly understand the allegations made and take appropriate actions to ensure that the welfare of workers on the KIS refurbishment project is meeting our requirements, including the WW Standards. We will welcome further input from Amnesty International into this process as required by due process and in the furtherance of our mutual goal – ensuring the welfare of all of our workers.

Yours sincerely,



Hilal Al Kuwari  
President, Aspire Zone Foundation

Attention: **Meghna Abraham**  
**Director for Global Thematic Issues**  
**Peter Benenson House**  
**1 Easton Street**  
**London WC1X 0DW**  
**United Kingdom**

Date: 02<sup>nd</sup> March 2016

Reference:

MC/RHK/095/16

[Page 1 of 1]

Your reference:

TG MDE 22/2016.001

Enclosures:

Copy to:

Dear Meghna Abraham,

We acknowledge receipt of your letter dated 9 February 2016, ref: TG MDE 22/2016.001 and on behalf of the Joint Venture MIDMAC-SIX CONSTRUCT, we advise as follows:

We thank you for clarifying the methodology followed by Amnesty International in its field research during February, March, April and May 2015.

We investigated Amnesty Internationals' allegations as an immediate priority upon receiving your first letter, looking at all organizations engaged to work on the Khalifa International Stadium refurbishment project, and we want to reassure you that as an organization, we take any allegations of abuse extremely seriously.

We recognizes its responsibility to hold both ourselves and our sub-contractors to the highest possible standards of labor practices and we are both contractually and morally committed to ensure the standards outlined in the Supreme Committee for Delivery & Legacy's Workers' Welfare Standards are adhered to across the board on the Khalifa International Stadium refurbishment project. We ensure that our entire workforce have the best working and living conditions which in turn is beneficial to all involved.

Further to your request for clarification on the questions posed in your letters, please find here under additional information which we trust will address your valuable concerns.

Are and part of the supply chain?

Midmac-Six Construct JV have never used the services of and/or and at this stage Eversendai and all our sub-contractors confirmed the same.

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استاد خليفة والمتحف في منطقة اسباير  
ص. ب. 1758  
الدوحة - قطر

تلفون: 44529452 (974)  
فاكس: 44426249 (974)

**Has Seven Hills been part of the sub-contractor review process?**

Date: 02<sup>nd</sup> March 2016

Reference:

MC/RHK/095/16

[Page 2 of 5]

As per the Supreme Committee for Delivery & Legacy's Workers' Welfare Standards, Midmac-Six Construct JV & our sub-contractors must adhere to and be compliant with the Workers' Welfare Standards if engaged on a World Cup-project. The same obligations to follow the Q22 standards are part of all the subcontract agreements.

We mandate that all our sub-contractors conduct their own self-audits and audits of their labour supply companies in line with the Worker's Welfare Standards to ensure that any organization engaged on a World-Cup related project is compliant with the Workers' Welfare Standards.

Eversendal uncovered a number of areas of non-compliance during an inspection in May 2015, specifically regarding the accommodation used by Seven Hills, and they subsequently decided to terminate the contract they had with them for their services on the Khalifa International Stadium refurbishment project and engaged their direct labour wherever possible in order to avoid risks that might arise while engaging labour supply companies on the project.

**How did Midmac review the application and enforcement of the WWS to and by the business in its supply chain for KIS?**

Midmac-Six Construct JV enforces compliance of the Supreme Committee for Delivery & Legacy's Workers' Welfare Standards with direct sub-contractors and any worker stepping foot on a World Cup-related project. A clause related to the compliance with the Workers' Welfare Standards is applied to all agreements and has been in place since we started working on the project in 2014. A number of audits and camp inspections were done in 2015 to the direct subcontractors at Khalifa International Stadium.

Another measure to enforce the respect of WWS standards was by conducting intensive camp inspections covering all the subcontractors as well as their supply chain (if any) and this was in effect starting 2016. Where non-compliance is found, either a rectification plan is implemented in line with the Supreme Committee for Delivery & Legacy's Workers' Welfare Unit or punitive measures are taken which may reach to terminating of the subcontract agreement.

Midmac-Six Construct JV now has a block in Barwa Al Baraha camp specifically reserved for any non-compliant sub-contractors to allow them move their workforce engaged on a World-Cup project to this new camp prior to mobilizing their workers to the site. Whilst accommodation has been our primary focus in 2015, we are also increasing our ethical recruitment auditing in 2016 and working with Aspire Zone Foundation and the Supreme Committee for Delivery & Legacy's Workers' Welfare Unit to increase checks across the board.

Date: 02<sup>nd</sup> March 2016

Reference:

MC/RHK/095/16

[Page 3 of 5]

**Did Midmac carry out an assessment of Eversendai Qatar compliance prior entering in contract?**

Midmac-Six Construct JV is contractually bound to ensure that both its' workers and practices, as well as any of its sub-contractors are compliant with the Workers' Welfare Standards and accordingly MSJV and Eversendai clearly agreed on the Q22 standards and the contract was signed on this basis.

MSJV inspected Eversendai camps in January 2015 in order to verify their level of compliance and after their facilities evaluation, Eversendai relocated their camp to Barwa city in order to accommodate their teams working at Khalifa International Stadium.

**Did Midmac include any requirements with respect to human rights in Eversendai contract for Khalifa International Stadium Project?**

Eversendai and all sub-contractors and labour companies are contractually obliged to ensure compliance with SC's Workers' Welfare Standards if they have any workers engaged on a World Cup-project.

**Prior to 5 Jan2016 was Midmac aware of the involvement of Seven Hills on Khalifa Stadium International project?**

Before 5 Jan 2016 Midmac-Six Construct JV were only assessing their direct subcontractors and accordingly the presence of Seven Hills on the project has only been highlighted to us after receiving Amnesty letter.

**When/how was Seven Hills involved?**

Eversendai had between nine and 21 workers from Seven Hills working at Khalifa International Stadium refurbishment project between October 2014 and June 2015.

**What checks were done concerning Seven Hills case?**

Upon receiving Amnesty International's Amnesty letters, Midmac-Six Construct JV launched immediate investigation into Seven Hills' appointment on the Khalifa International Stadium refurbishment project which included and was not limited to:

- Identifying the exact number of personnel who attended the site on daily basis.
- Received a confirmation from Seven Hills through Eversendai that all the labours had received their complete salaries for the duration they worked at KIS.

Date: 02<sup>nd</sup> March 2016

Reference:

MC/RHK/095/16

[Page 4 of 5]

**Why did Seven Hills contract end?**

Eversendal terminated their contract with Seven Hills on the Khalifa International Stadium refurbishment project due to concerns related to their non-compliant accommodation.

**Could you clarify whether MIM Inspects labour camps?**

Midmac-Six Construct JV was only conducting camp inspections of its direct sub-contractors and therefore never inspected the labour camp of Seven Hills in Al Wakrah. Starting 2016, Midmac-Six Construct JV started inspecting camps related to all manpower working on the Khalifa International Stadium refurbishment project.

**Retention of Passports:**

All workers can freely choose between two clear options:

- Either safeguarding their own passports and personal documentation;
- Or with the company, for safety reasons, to be kept in secure place. The worker can take it back at any time.

The worker is required to sign a consent form for both options.

Nevertheless, MIDMAC is now in the process of handing over all labours their passports.

**Checks on other Elements of Workers Welfare:**

Deceptive recruitment practice: Although Midmac-Six Construct JV does not have the authority to check the recruitment practices of sub-contractors, once we are aware of clear offenses regarding good recruitment practice, and the sub-contractor makes it clear they are not willing to change their recruitment practice, we avoid further collaboration.

**How does Midmac check that workers have a valid QID?**

Effective from Nov 2014, Midmac-Six Construct JV started checking all workers' QIDs, prior to attending any safety induction session. Failing to have the induction will result in the worker being refused from entering the site.

**Prior the WPS (wages protection system), how did Midmac check that the sub-con workers are getting paid on time?**

Prior the WPS, Midmac-Six Construct JV was not in a position to control the payroll of sub-contractors. Once we are aware of late payment of any subcontractor workers, we liaise with their management to pay due amounts without any delay.

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Reference:

MC/RHK/095/16

[Page 5 of 5]

**Termination of non-compliant subcontractors:**

For Midmac-Six Construct JV, terminating a sub-contract agreement is the strongest message we can send to those who are found to be non-compliant. Such action will surely change the attitude and approach of such sub-contractors if they are hoping to stay in the market.

**Communication with Supreme Committee:**

Midmac-Six Construct JV has to ensure that the Workers' Welfare Standards are followed by us, as well as our sub-contractors and labour supply companies. When a sub-contractor is not willing to correct deficiencies, the most immediate effective action towards the sub-contractor is to immediately stop any collaboration with them.

Upon request from the Supreme Committee for Delivery & Legacy, we communicate the names of sub-contractors removed from the site until they correct the deficiencies towards the Workers' Welfare Standards. Failure to rectify problems within a given time period could lead to termination of contract.

**Nature of Contract with AZF?**

We appreciate your understanding that this is confidential and an approval from the client should be obtained before releasing such information.

We admire the work that Amnesty International does and are fully committed to ensuring that our entire workforce is treated with the dignity and respect they deserve.

Kind regards,



**RAGHIB H. KUBLAWI**  
General Manager- MIDMAC

AMNESTY INTERNATIONAL  
International Secretariat  
1 Easton Street  
London WC1X 0DW  
United Kingdom

Attn: Ms. Meghana Abraham  
Director of Global Thematic Issues

Date : 4 January 2016

Re: Abuse of Workers on Khalifa International Stadium Project

SCQ/QHO/6.0/VPAL-16949/15

Page 1 of 4

Dear Ms. Abraham,

Contact direct:  
Mr. Valery Paquier  
Tel : +974 4423 8000  
Mobile +974 5587 2975  
Email : [vpaquier@sixco.ae](mailto:vpaquier@sixco.ae)

We acknowledge receipt of your letter reference TC MDE 22/2015.008 dated 21<sup>st</sup> of December 2015.

We respect Amnesty International as an organization and applaud its efforts to support and respect human rights in general and living standards of migrant workers specifically. We endorse your cause as many of our employees do.

Enclosure(s):

1. Example of Engagement letter compliance with Q22 rules (annex 01)
2. Example of inspection reports Midmac Six Construct JV (annex 02)
3. Self-Audit Accommodation & Ethical Recruitment (example by Eversandal in annex 03)

Six Construct, as a member of the BESIX Group, equally believes it is our responsibility to hold ourselves and our suppliers and subcontractors to highest possible standards of labor practices as amongst others defined by ILO standards. This is why we take the allegations made by your organization seriously and have looked into your findings with scrutiny.

Copy to:

Despite the fact that your query falls in the middle of the holiday season, we have made every possible effort to get back to you within your suggested time frame. We regret to note however that we first hear about your findings more than half a year after the research has been conducted. If in the near future you would have similar information at your disposal we would appreciate it to be timely informed in order to allow us to respond immediately and to make sure that any distress for workers can be solved instantly rather than several months later.

In addition we would have appreciated it to receive more transparency on the research methodology that was used. This not only to understand how your findings have been established but also to improve our own conducted reviews and surveys with the purpose to quickly identify and end any discrepancies.

Before providing a detailed response to your listed questions we would like to state the following.

As you probably know Six Construct has a track record of 50 years in the Middle East. Our license to operate in this region includes a solid engagement to high quality work and life conditions for our workers, which we continue to improve further. In this respect we would like to point out that Six Construct aims to go further than applying local rules. As stated in our CSR Report 2012-2014 on our efforts in the Middle East and Qatar specifically we have initiated higher base camp standards, including recreational facilities, bus shuttles to the city center,

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D.R. 20145

taking care of medical expenses for our workers, ensuring training through "Right to Learn" on IT-skills and many other initiatives.

Mid 2013 we also installed a salary reform in collaboration with the UAE Ministry of Labor in order to better address the local legal requirements as to the monthly salary structure, maximum overtime and related allowance, resulting in a 3% salary increase.

We are also granting monthly seniority increases to workers since many years. Many of our local employees (workers) have reached a seniority of over 20 to 30 years in our company, thus demonstrating our long term presence in the region with a sustainable workforce.

Safe working conditions is a key priority within the BESIX Group. Six Construct reports no fatal injuries on its sites in Qatar over the last three years (including for our subcontractors). In October of this year we reached a major safety milestone on the Khalifa stadium project, where we completed 3.7 million man-hours without any lost time accidents.

On multiple occasions Six Construct participated to the BWI visits in Qatar in light of the World Cup 22 organization. We have organized site and camp visits for this organization in the presence of the Belgian Workers Delegation, as BESIX SA is a Belgian company. For these efforts we have received many positive reviews. You might want to contact Rik Desmet, Federal Secretary of the Belgian Socialist Union, to testify on this proactive cooperation (contact address: Rue Haute 26-28, 1000 Brussels, Belgium).

As part of this commitment we are most willing to answer your questions and hope to clarify your concerns to the best of our abilities.

▪ Human rights due diligence carried out for subcontractors and delays of salary payments

Salary payments are now controlled by the government since the Qatar wage protection system (WPS) came into effect on November 2. It means that the General contractor doesn't have any legal authority on any subcontractor or workforce dealer, to control their payroll systems and salary payments. Despite of this, Midmac-Six Construct JV has sent an engagement letter a year ago to most of the subcontractors and work force dealers, to be signed by them as a commitment to their full awareness/compliance with Q22 rules and Qatari law. (Annex 1)

Moreover, the site welfare officer is in a constant dialogue with workers in the mess hall and listens to their concerns. So far, no issue was raised related to salaries.

For Seven Hills Trading (mentioned in your letter), we would like to point out that they are not working on the site since several months. Eversandai Qatar hired them during the first quarter of 2015; but because of the strict control on paper work, sponsors and attested agreements and Eversandai Qatar camp inspection, Eversandai Qatar gradually replaced the Seven Hills workers with Eversandai Qatar workers. As of today Eversandai Qatar doesn't have any hired worker working on the Khalifa Stadium Project.

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▪ Other contractual relationship and accommodation inspections

There are indeed other subcontractors working on the site. Midmac-Six Construct JV has conducted several camp inspections in the course of 2015. These inspections focus on the safety of employees, fire protection system, employee welfare facilities, health and hygiene, emergency procedures, maintenance, etcetera.

A brief report of inspection is made and includes the recommended actions to resolve any problems or shortcomings discovered during the inspection. It is then distributed to employee accommodation management for necessary action.

During some of these inspections Midmac-Six Construct JV did discover breaches of the Supreme Committee Workers Welfare standards. As a result of this contracts with a few subcontractors were terminated, such as JMCI. In other cases subcontractors acted upon our inspection reports: e.g. following an inspection report conducted in January 2015 by Midmac-Six Construct JV, Eversandai Qatar took immediate action by shifting their workers to another (Barwa) camp with better working conditions (approved by the consultant for the project).

See Annex 2: "Eversandai Qatar camp inspection in Jan 2015 & Dec 2015". Moreover, Midmac-Six Construct JV has always asked the subcontractors to provide us with the signed/stamped "Self- Audit accommodation & Ethical Recruitment". Attached is the self-audit sent by Eversandai Qatar in June 2015 (Annex 3).

▪ Complaints made by workforce

Midmac-Six Construct JV never received any complaint from any subcontractor workers, neither to us in the administration, nor to HSE department, nor to the welfare officer, nor in the suggestion boxes scattered all over the site.

▪ Inspections from the Supreme Committee for Delivery and Legacy

The Supreme Committee Workers Welfare & several Media channels & Journalists, have visited the site & Midmac camp in St 41, several times and they were always satisfied. The inspections of the other camps are to the discretion of the Supreme committee.

▪ Measures proposed by Six Construct to avoid abuse

Midmac-Six Construct JV will continue conducting camp inspections for subcontractors. We are sending one month notice letters to subcontractors breaching the standards with a strict follow up after one month. In case the subcontractor camp is still not compliant with Q22 standards, the contract will be terminated.

In addition Technical & commercial teams are notified not to sign any agreement with subcontractors prior to checking the welfare facilities/accommodation of their camps

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We hope to have clarified your questions and to have demonstrated our commitment to corporate citizenship in Qatar, as in the rest of the world where we operate.

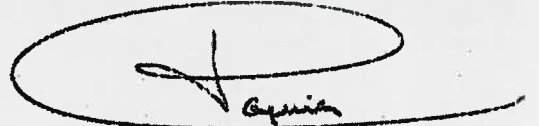
We are willing to facilitate for your organization a visit to one of our camps together with your representatives to give you a better insight into actual working circumstances.

Finally, we would appreciate it a lot, as a token of an open dialogue, if you inform us upfront before publishing any text on our behalf.

Yours faithfully,  
For and on behalf of  
**Six Construct Qatar Limited (WLL)**



**Pierre Sironval**  
Managing Director Six Construct



**Valery Paquier**  
Resident Manager - Qatar

Ref.: MC/RHK/011/16  
Date: 13 January 2016

**Meghna Abraham**  
**Director for Global Thematic Issues**  
**Amnesty International**  
**Peter Benenson House**  
**1 Easton Street**  
**London**  
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**United Kingdom**

Dear Meghna Abraham,

Thank you for your letter dated 5 January 2016, ref TC MDE 22/2015.009.

We are deeply concerned to read your serious allegations including those of abuse on the Khalifa International Stadium refurbishment project (KIS Project).


MIDMAC has the utmost respect for Amnesty International and supports the organisation in its efforts to protect workers around the world. MIDMAC believes it is our responsibility to hold ourselves, suppliers and subcontractors to the highest possible standards of international labour practices, and to ensure the welfare of our workers at every level of the supply chain. MIDMAC is a company that has been trading in Qatar for over 50 years, and we treat the issue of human and workers' rights very seriously.

The Supreme Committee for Delivery & Legacy's Workers' Welfare Standards (WWS) apply to the KIS Project. As an immediate action we have complied with a request from our client Aspire Zone Foundation (AZF) for an immediate review of the application and enforcement of the WWS at MIDMAC and with all of our subcontractors and labour supply companies on the KIS Project.

We regret that without receiving further substantiation from Amnesty International, we cannot comment on the specific allegations mentioned in your letter. We would therefore be grateful if you could submit the relevant evidence in your possession to help us investigate the allegations more fully. Without such evidence we are unable to respond to the specific allegations and issues raised in your letter.

However, in the meantime please be assured that we are continuing to work with AZF in ensuring compliance with the WWS by all relevant parties, and will be happy to share progress with you in due course. Rest assured that no worker should fear being penalized after coming forward to raise a complaint.

Yours sincerely,



**RAGHIB H. KUBLAWI**  
General Manager

# EVERSENDAL

EVERSENDAL ENGINEERING QATAR W.L.L

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Ref: EVSQ/AI/LTR/002/16

05 March 2016

Amnesty International

International Secretariat

1 Easton Street

London WC1X 0DW

United Kingdom

**Your reference : TC MDE/22/2015.019**

**Kind attention : Ms Meghna Abraham, Director of Global Thematic Issues**

Dear Ms Abraham

We write further to your letters of 8 December 2015 and 18 January 2016 and our letter of 16 December 2015. We have now had the opportunity to carefully consider the issues raised in your letters and to carry out further internal assessments. The response could not be given within your stipulated time in order to give a measured response and obtaining the necessary approvals.

As we mentioned in our previous letter, we regret that we have not been given the opportunity to respond to the various issues raised in your correspondence other than by reference to extracts of individual and now historic anecdotes, and without the benefit of the context in which they were made. Had these matters been discussed with us at the time, we would have been able to address them in a fairer context and we could have satisfied any concerns you may have had without the need for protracted correspondence.

The Eversendal Group seeks to apply best practice in health and safety and worker welfare standards across its worldwide projects. On our projects in Qatar, we are confident that our practices and procedures are compliant with the laws of Qatar and, where appropriate, with the Supreme Committee's Workers' Welfare Standards (the 'Welfare Standards'), but we have nevertheless carried out a further detailed study of our policies and practices against the Welfare Standards to identify where there may be any minor shortcomings. We assure Amnesty International that our internal investigations have been limited to a review of policies and practices and that no workers will be "penalised" in any way for sharing information with you.

We explained in our letter of 16 December 2015 that Eversendal believes in continuous improvement and to that end we are always striving to improve conditions for our workforce. This letter highlights some specific steps that we have recently taken in furtherance of that commitment to welfare and development. In doing so, we also respond in more detail to a number of the issues which you have raised in your two letters.

## **Blue Bay Contracting and Seven Hills Trading**

You will understand that commercial and contractual confidentiality prevents us from disclosing the details of contracts with other entities involved in the Khalifa International Stadium refurbishment. However, in the interests of co-operation, we can confirm that Eversendal engaged Seven Hills Trading for a limited period between October 2014 and 11<sup>th</sup> June 2015 and Blue Bay Contracting for an even shorter period from 15<sup>th</sup> October to 27<sup>th</sup> November 2014. The allocation of workers from these two companies for this project is shown in the attached lists.

The engagement of the Seven Hills workers came to an end following an inspection of their labour accommodation in May 2015.

# EVERSENDAL

Ref: EVSQ/AI/LTR/002/16

As we mentioned in our letter of 16 December 2015, we stopped dealing with these companies before we received your letter of 8 December 2015. We have no intention of working with them in the future, having concluded that direct employment is the most effective way to ensure the welfare standards of all personnel employed on our projects.

We were not aware that Seven Hills were placed on the watch list by the Nepal Embassy in Qatar or that Blue Bay has been accused of certain malpractices. Thank you for drawing this to our attention. As mentioned above, Eversendal will, in future, be engaging direct labour wherever possible in order to reduce the potential risks associated with engaging labour supply companies.

## **Retention of passports**

In clarification of Eversendal's policy on this issue, Eversendal has only held employees' passports if they specifically requested that we do so for safekeeping.

All employees were offered the choice of either retaining their passport in their own control (and at their own risk) or asking Eversendal to hold the passport for safekeeping. Eversendal maintains signed, written records of each employee's choice and a sample letter of each choice is attached. All passports held by Eversendal were returned without delay upon the written request of the holder. This in line with the First Edition of the Supreme Committee's Workers' Welfare Standards

However, we note that the Supreme Committee's Semi-Annual Workers' Welfare Compliance Report, for the period October 2014 to March 2015, states that the Supreme Committee will implement a new policy in the Second Edition of the Welfare Standards requiring that all workers must maintain personal possession of their passports, regardless of their preference. In anticipation of this new policy, we have returned all passports to our Employees irrespective of their preference. We shall also put auditing procedures in place to ensure compliance by all of our subcontractors.

## **Accommodation**

Eversendal workers and the workers of our subcontractors, where they do not meet the welfare standards, are housed in the Eversendal rented accommodation. Eversendal has carried out its own inspection and identified a list of items that could benefit from improvement, mostly in relation to communal recreational, telephone and internet facilities. We aim to have rectified these issues by the end of March 2016, at the latest.

We have been endeavouring to hire a resident doctor at the accommodation, however we have encountered difficulties in obtaining the necessary visa. As an interim measure, we have entered into an agreement with a medical clinic to provide medical services to our employees, in addition to the treatment which they are entitled to receive from Hamad Hospital through the health card.

The employees of all current subcontractors are housed in the same accommodation as Eversendal's employees. Procedures have been put in place to ensure that any future subcontractor employees will also be housed in the same accommodation, if our audit deems it necessary.

As offered by us and requested by you, we attach a copy of a recent inspection report of our accommodation provided to us by the main contractor and consultant.

While you have not specifically raised the following issues these now form part of our on-going auditing process and are clarified as under.

## **Payment of workers**

We re-confirm that all Eversendal workers are paid directly into their individual bank accounts and in strict accordance with the Welfare Standards.

# EVERSENDAI

Ref: EVSQ/AI/LTR/002/16

## **Transportation**

All Eversendai workers are transported to and from the site in buses that comply with the Welfare Standards.

We are monitoring our subcontractors' transportation. Where there are shortcomings in the subcontractors' vehicles, their employees are transported in Eversendai vehicles.

## **General mandatory requirements**

Eversendai has initiated amendment of its policies to ensure that it now meets each and every requirement under this section of the Welfare Standards.

Eversendai will put an audit system in place to ensure compliance from its subcontractors.

## **Records and Access**

Eversendai is in full compliance with this section of the Welfare Standards.

## **HSE Requirements**

Eversendai complies with these requirements in addition to the specific HSE requirements of the project site.

In regards to some other information requested by Amnesty International, as asserted above, we are not in a position to comment on the specifics of contracts with other entities involved in the project, although some of the information that you seek is available in the public domain.

Lastly, we wish to assure Amnesty International that Eversendai treats the issues raised in your letters very seriously. The welfare and safety of our workforce is of paramount importance to us and we will always take steps to improve when we become aware of any deficiencies.

Should you have any further concerns then we would be happy to discuss them with you in person. It is our belief that our shared goals for the improvement of workers' welfare are best achieved through transparency and co-operation rather than through continued exchange of correspondence of this nature.

Yours sincerely,  
for and on behalf of Eversendai Engineering Qatar W.L.L.



**Stanley Baker**  
Executive Director

# EVERSENDAL

EVERSENDAL ENGINEERING QATAR W.L.L

No.41 New Industrial Area, P.O.BOX: 35283 Doha, Qatar,

Tel: 44114378 Fax: 44114381 Email: [eversendal.qatar@eversendal.com](mailto:eversendal.qatar@eversendal.com), Web: [www.eversendal.com](http://www.eversendal.com)

EVSQ/AI/LTR/001/15

16th December 2015  
AMNESTY INTERNATIONAL  
International Secretariat,  
1 Easton Street,  
London WC1X 0DW,  
United Kingdom

**Kind Attn. : Ms. Meghna Abraham., Director of Global Thematic Issues**

Dear Ms Abraham,

We are in receipt of your TC MDE 22/2015.013 dated 8 December 2015 and have noted its contents.

It is our understanding that Amnesty International, by virtue of it being an established and recognized NGO, and, as has been customary in the past in Qatar, would have conducted such a survey after obtaining the required permissions from the relevant authorities. This allows all concerned parties to be surveyed at the same time rather than respond to allegations more than seven (7) months after the alleged testimonies. Nevertheless, we respectfully put forth our response to the various allegations.

Our initial investigation makes it very clear that Amnesty International did not seek the required permissions before conducting the survey. This is very obvious as neither the main contractor's staff nor our personnel have been made aware of such a survey being conducted.

In the first instance we reject any and all allegations made against Eversendal as they are based on hearsay and not on verified facts. Even a court of law takes evidence from both parties before arriving at a judgment whereas Amnesty International have made serious allegations without the benefit of hearing the viewpoint of the other party.

In response to the questions posed by you we respond as follows:

## Question #1

At the time that the survey purportedly took place Blue Bay Contracting was not engaged by us on the Khalifa Stadium project. There were only nine (9) personnel of Seven Hills at this time who were removed soon thereafter. We have restricted hired workers being engaged on the Khalifa stadium project and, where we have observed certain shortcomings for such workers, we have housed them in our accommodation that complies fully with the standards set for the Khalifa project.

## Question #2

No, we have never been aware that Seven Hills were placed on the watch list by the Nepal embassy in Qatar or that Blue bay has been accused of certain malpractices. In fact we have discontinued dealing with these companies for some time and henceforth will ensure that we do not deal with them.

## Question #3

At the present time we do not have any contractual relationships with any other labour supply companies for the Khalifa stadium project.

# EVERSENDAL

EVSQ/AI/LTR/001/15

## Question # 4

We conduct regular inspection of our worker' accommodations and we even have suggestion / complaint boxes located at our accommodations for workers to register their complaints. On the Khalifa stadium project our accommodation has been subject to inspection by the main contractor and consultant and it was found meeting the required standards. These reports can be provided on request.

## Question #5

As stated earlier, we have suggestion / complaint boxes located at our accommodation. We have never received any written complaints but have a camp boss at the accommodation to cater to the needs of the workers.

## Question #6

Eversendal has never received complaints from the Supreme Committee and, while the accommodation relevant to those engaged on the Khalifa stadium, has not been inspected by the Supreme Committee, it has been inspected by the Main Contractor and Consultant.

## Question #7

Given the fact that Eversendal have not abused the workers engaged by them no remedial action is deemed necessary. However, Eversendal does believe in continuous improvement and, to this end, will strive to improve on working conditions for its workforce.

We trust that we have interpreted your questions correctly and responded appropriately. In addition, we would emphasize that Eversendal takes the welfare of its employees seriously and testimony of this fact is that there are many of them, including workers, who have been with Eversendal for more than 15 years. We would also like to highlight the following issues with respect to some of the allegations made.

1. Eversendal pays salary to the all its employees regularly every month on time based on the agreed wage in the labour contract. All wages are transferred directly to the workers' bank accounts in accordance with Qatar law and WPS.
2. All residence permits are provided to Eversendal workers as required by Qatar law.
3. All Eversendal workers are provided with Health cards as per Qatar law.
4. Eversendal workers' passports are retained in the custody of the Company for safekeeping with the written consent of each individual worker. Exit permits are arranged as per Qatar law when the individual is proceeding to his home country after due authorization.

Whilst Eversendal do not believe it has violated any Qatar Law and has always sought to take cognizance of the welfare of workers, this is always a continuous improvement process that is the very culture of the Company.

Our record for looking after workers' welfare in the region has stood the test of time and we are proud of our accomplishments in this direction. We continuously strive to improve living standards and welcome any opportunity to discuss / debate these issues in a more forthright and transparent manner.

In conclusion, we believe that the allegations made by Amnesty International that Eversendal personnel are abused and not provided adequate welfare in accordance with Qatar law is based on alleged unsubstantiated hearsay testimonies.



# EVERSENDAI

EVSQ/AI/LTR/001/15

Whilst we applaud the role played by Amnesty International in improving the living standards of workers worldwide we do believe that, as far as the allegations against Eversendai are concerned, had these been discussed with us at the time it would have been a simple matter to address them in a mutually acceptable manner.

We trust that the foregoing explanation has convinced you of our integrity as a company. Should you require any further clarification please feel free to contact us.

Yours faithfully,  
for and on behalf of Eversendai Engineering Qatar W.L.L.,



**Stanley Baker**  
Executive Director



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Date: 15 Feb 2016

Ref:ana/038/16

**FOA Meghna Abraham**  
Acting Director  
AMNESTY INTERNATIONAL  
International Secretariat  
Peter Benenson House  
1 Easton Street  
London  
WC1X 0DW  
United Kingdom

Dear Meghna Abraham

**SUBJECT: Letter from Amnesty International dated 25 January 2016**

**URGENT: Sent via e-mail and courier**

We refer to your letter dated 28 January bearing the reference "TC MDE 22/2015 021".

As mentioned in our previous letter dated 17 January 2016, Nakheel Landscapes ("Nakheel") is an organisation which takes matters of employee welfare seriously. In particular, Nakheel has been working closely with the Supreme Committee to ensure that working conditions on such projects are in compliance with the Supreme Committee's Workers' Welfare Standards ("Welfare Standards"). This has resulted in many positive changes being made since its appointment by the Supreme Committee and is a process that Nakheel remains committed to going forward.

We nevertheless remain concerned at the allegations raised by Amnesty in its letters dated 3 December 2015 and 28 January 2016. You will recall that in our letter of 17 January 2016, we requested that Amnesty provide full disclosure of the information upon which its allegations are based. Unfortunately, this information has not been provided and consequently, whilst we will endeavor to address your concerns as best we can, we are not able to address the specific points that you have raised until such time this evidence is provided.

In the meantime however, we have set out our response to the questions that you have raised in your most recent letter of 28 January 2016 below.

1. **PASSPORTS**

- 1.1 Nakheel can confirm that it does not retain possession of passports belonging to employees. As part of its ongoing improvements, all employees have been provided with individual secure locker facilities in which to keep passports and other personal documentation. All passports remain in the possession of individual employees.

2. **ACCOMMODATION**

- 2.1 Nakheel has gone to great lengths to ensure that its employee accommodation is in compliance with applicable standards. Nakheel can confirm that all 150 employees working on Supreme Committee related projects have been housed at Labour City since October 2015. Such accommodation is in compliance with the Welfare Standards.



2.2 Nakheel also has ongoing projects unrelated to the Supreme Committee and has relocated over 1100 employees to Labour City with the intention of housing further Nakheel employees in Labour City within the fourth quarter of 2016.

2.3 For the avoidance of doubt, Nakheel denies that employees employed on Supreme Committee related projects have been housed in rooms with bunk beds and/or with more than four people per room (and in one instance fourteen people). Nakheel considers that the research conducted by Amnesty is either inaccurate and/or its findings relate to another contractor other than Nakheel.

2.4 On projects unrelated to the Supreme Committee, Nakheel confirms that all employee accommodation is in compliance with the Qatari law with appropriate occupancy and other requirements being followed by Nakheel. Notwithstanding this and as explained at paragraph 2.2 above, the intention is to relocate further employees to Labour City within the fourth quarter of 2016.

### 3. **HEALTH**

3.1 Nakheel operates in strict compliance with Labor Law Number 14 of 2004. Nakheel denies that it has ever made deductions from pay in circumstances where an employee has followed the required processes and obtained a medical certificate from a licensed physician in Qatar. We further highlight that all Nakheel employees have unlimited access to free public medical care whilst employed by Nakheel.

### 4. **DECEPTIVE RECRUITMENT**

4.1 Nakheel is deeply concerned to read your allegations of deceptive recruitment practices. This is a practice which Nakheel feels strongly about and is not prepared to tolerate. Now that this has come to our attention, Nakheel is making enquires of potential recruitment agencies both in Qatar and abroad. In particular, Nakheel now requires confirmation from recruiters that they do not deduct money from and/or deceive employees about salaries and/or other benefits.

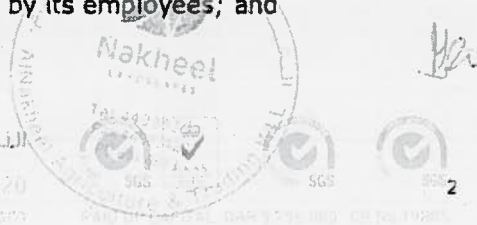
4.2 Nakheel nevertheless accepts that there may be recruiters who do not follow appropriate standards and requests that Amnesty share the names of such recruiters together with any relevant guidance on how this problem could be addressed going forward.

### 5. **THREATS AND THE WITHHOLDING OF EXIT PERMITS AND PASSPORTS**

5.1 Nakheel is unable to respond to the specific allegations that you have raised without first being provided with the relevant details upon which the allegations are based. Nakheel has no knowledge of the incident to which you refer and in the absence of supporting information denies that this incident took place.

5.2 In relation to your comments on exit permits and withholding of passports, please note that:

5.2.1 the fact that exit permits are required to leave Qatar is beyond the control of Nakheel. Exit permits are required for all expats in Qatar regardless of nationality and/or where they are employed. This is a procedural requirement over which Nakheel has no control. Notwithstanding this Nakheel does not refuse to issue exit permits when required by its employees; and





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5.2.2 Nakheel does not retain possession of passports belonging to employees as addressed at point 1 above.

6. **EXIT PERMITS**

6.1 As stated at paragraph 5.2.1 above, Nakheel does not refuse to issue exit permits when required by its employees. On the contrary, over the last 24 months Nakheel has, on several occasions, facilitated air travel at short notice and at its own cost.

Nakheel is an organisation committed to making improvements to employee conditions in Qatar and asks that Amnesty work with it to achieve this goal. This can only really be achieved if the parties are willing to constructively share relevant information so that any relevant issues can be appropriately addressed.

In the absence of such information, we wholly deny abuse of any of our workers on the Aspire Maintenance Project or in fact any Nakheel related project in Qatar.

Yours sincerely

NAKHEEL LANDSCAPES



Ghassan Oueljan

Managing Director





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Date: 17 Jan 2016

Ref:ana/0025/16

**FOA Meghna Abraham**  
Acting Director  
AMNESTY INTERNATIONAL  
International Secretariat  
Peter Benenson House  
1 Easton Street  
London  
WC1X 0DW  
United Kingdom

Dear Meghna Abraham

**SUBJECT: Letter from Amnesty International dated 3 December 2015**

**URGENT: Sent via e-mail and courier**

We refer to your letter dated 3 December 2015 bearing the reference "TC MDE 22/2015.006".

As an initial point we must state that we are deeply concerned to read of your serious allegations regarding the welfare of our workers. Nakheel Landscapes ("Nakheel") takes great pride in ensuring that all of its employees, whether connected with the Supreme Committee for Delivery & Legacy ("SC") or otherwise, are provided with working conditions that comply with the standards imposed by domestic Qatari law as well as SC's Workers' Welfare Standards ("Welfare Standards").

As an organisation, we take matters of employee welfare seriously and consequently have gone to great lengths to ensure that the people that we employ are treated fairly and in accordance with relevant governing legislation. We have, for example, introduced initiatives such as an "Employee Consulting Procedure" launched on 1 December 2015 which is specifically designed to encourage employees to put forward any points that they wish to raise via a pre-elected employee representative.

We note that your research appears to be based on a project related to the maintenance and development of green spaces at the Aspire Zone ("Aspire Maintenance Project") and that your field research was conducted between the months of February and May 2015. It is worth noting that since Amnesty International was in Qatar, Nakheel has made a number of improvements for its workforce such as relocation to improved accommodation in Labour City and held its first elections for worker representatives. The State of Qatar has also introduced a number of mandatory improvements such as the Wage Protection System ("WPS") which came into effect in November 2015.

Given the seriousness of the allegations, we ask that Amnesty International provide full disclosure on the information upon which your allegations are based. This will enable us to conduct an immediate and thorough investigation and address the points and questions that you have raised.

In the absence of this evidence, we wholly deny abuse of any of our workers on the Aspire Maintenance Project or in fact any Nakheel related project in Qatar.

التبديل للزراعة و التجارة د.م.ش.م  
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LANDSCAPES INTERNATIONAL DAKHARA OFFICE 15th FLOOR 1

In line with the final paragraph of your letter, we can assure you that Nakheel employees will not be penalised for sharing information with Amnesty International, which, in any event, would be in breach of our general employment practices.

We apologise for the delay in responding and look forward to hearing from you.

Yours sincerely

**NAKHEEL LANDSCAPES**



**Ghassan Oueijan**

**Managing Director**

