

# UNJUST TRANSITIONS

Climate Migration, Heat Stress, and Labour Exploitation in the United Arab Emirates







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Equidem

Equidem is a human rights and labour rights not-for-profit working globally to promote the rights of marginalised communities, accountability for serious violations, and building the human rights movement. Our team of worker activists, investigators and policy experts expose injustice, provide solutions for the most intractable human rights challenges and work closely with other grassroots and global civil society to empower the individual and the community.

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CORRESPONDENCE WITH SIEMENS ENERGY

CORRESPONDENCE WITH EXPO CITY DUBAI

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The last place I worked was a pharmaceutical company. I had to leave my job because of rains and floods, due to which interior Sindh (Pakistan) basically drowned. Because of that, the company could not manage to sell their products anymore and I had to leave my job.

- A Pakistani worker employed at Mohammed bin Rashid Al Maktoum Solar Park, United Arab Emirates

This job causes very serious health issues. Sometimes I am made to stand more than 10 hours in the scorching sun and this gives me a constant headache all the time. I have to take pain killers to cool it down which isn't good for my health.

— An East African worker employed by a subcontractor for Siemens Energy in the United Arab Emirates

I picked up a delivery from Diera City Centre at around 1 pm and was on my way to Naif. While nearing the area, I felt dizzy. I parked my bike. While taking out the bottle from the container, I felt

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awkward and collapsed. People around there carried me to the shade, sprayed water on my face, awoke me and brought me back to consciousness. The medics diagnosed that it was a heat stroke.

—An Indian delivery service worker employed by a subcontractor for Talabat in Dubai, United Arab Emirates

The division of work is based on racism. Most Africans are assigned more duties compared to the Asians and the Arabs. Only particular nationalities are promoted. We Africans are always in the junior positions year in and year out, even when we are more skilled than the Arabs. There is also wage discrimination.

—A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park, United Arab Emirates

After fuel prices increased, some Pakistani nationals protested, demanding that the company raise the per delivery rate. There were 300-400 Pakistani nationals protesting and they were all sent home.

—A Nepali delivery service worker employed by a subcontractor for Talabat in Dubai, United Arab Emirates

Within the shining facilities at Expo City Dubai that will host the United Nations Climate Change Conference in November, internationally lauded solar and wind parks and a booming local gig economy, women and men from some of the poorest countries on earth are falling victim to an unjust transition. Migrant workers from Africa and Asia are being subjected to serious human rights abuses in the United Arab Emirates, a country whose oil and gas-powered economy is at the heart of the planet's climate crisis. Practices include working in extreme heat and other occupational health and

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safety risks, nationality-based discrimination, lack of opportunities for promotion, exploitative hiring practices, understaffing and overwork, wage theft, workplace violence, overcrowded accommodations, inadequate food allowances, and inadequate channels for workers to seek relief from these violations.

### Summary of findings

Investigations by Equidem between February and November 2023 documented significant labour and human rights violations at Expo City Dubai and in the renewables and delivery sectors, including at Mohammed bin Rashid Al Maktoum Solar Park, Al Dhafra Solar Power Project, Noor Abu Dhabi Solar Plant, Sir Bani Yas Wind Farm Project; and in the delivery sector in the UAE. Equidem carried out in-depth, confidential, one-to-one interviews with 102 migrant workers—11 migrant workers employed in Expo City Dubai, 48 migrant workers employed in the renewables sector, and 43 migrant workers employed in the delivery sector. In addition to these one-to-one interviews, Equidem spoke to a total of 248 workers employed across these sites and sectors. Together, our insight into the renewables, construction, security, and delivery sectors in the UAE sheds light on both industrial and service sector working conditions for the 9 million migrant workers employed in the UAE.

- 57% of the migrant workers interviewed come from climate impacted areas of Asia and Africa.
- 41 % of the workers reported nationality-based discrimination.
- 77% of the workers interviewed in the renewable energy sector reported living in overcrowded accommodations, with up to 20 people in a room fit for six or fewer workers.
- 83% of the African and Asian workers interviewed reported being unable to afford nutritious and healthy food.
- 40% of the workers said they were skipping meals.

Equidem’s research found that African and Asian workers have migrated for employment based upon climate impacts in their own country, and then find employment in the industrial and service sectors in the UAE. These migrant workers are doubly impacted by the global climate crisis—they migrate in response to climate impacts and find employment in exploitative industrial and service contexts where they work long hours in extreme heat. These rights violations take place against a backdrop of racially

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delineated exclusion from labour rights protections, denial of freedom of association, and authoritarian suppression of dissent in the UAE.

Recognising the global nature of the climate emergency and its varying impacts across communities and societies, we want to emphasise the crucial importance of an inclusive, transparent, and respectful setting for all participants to engage in the COP process.

- Sultan Ahmed Al Jaber. COP28 President-Designate, UAE Special Envoy for Climate Change

A co-opted climate process

From November 30 to December 12, 2023, global leaders will convene at Expo City Dubai for the United Nations Climate Change Conference (COP 28) to align global efforts on climate action and rethink, reboot, and refocus the global climate agenda. Expo City Dubai, the site of COP 28, is promoted as a Human-Centric City of the Future, a city that exists in harmony with nature. The UAE is also proud to display cutting edge facilities to produce concentrated solar power and wind energy, including the Mohammed bin Rashid Al Maktoum Solar Park, the largest single-site solar park in the world. The UAE has invested heavily in its international reputation and will be keen to showcase that it takes the issue seriously.

Yet, in the months leading up to this critical global event, the UAE has undermined its position as president of the COP 28 climate negotiations and has jeopardised the climate crisis. It appointed the chief executive of its state oil and gas company to serve as the President of the COP 28 negotiations with little or no criticism from governments of the largest economies or the United Nations. Leaked documents revealed that the UAE intends to dramatically increase its oil and gas production and was found to have spent hundreds of thousands of petrodollars to bolster its climate image. The UAE maintains a system of racial segregation and labour exploitation that subjects 9 million migrant workers in the country, around 89 percent of the total population, to rampant exploitation, including as documented in this report, in the renewable, construction, security, food service, and delivery sectors—and even within Expo City Dubai.

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Bringing together extensive research into conditions for workers at Expo City Dubai, and the renewable and food delivery sectors in the UAE—an investigation that covers both industrial and service contexts—this report calls for urgent action by the UAE government; companies in the renewable, construction, security, food service and food delivery sectors; and global leaders convening for COP 28 to ensure that our global climate agenda includes urgent attention to decent work for all and especially the migrant communities who are among the most impacted by rising temperatures and other climate change impacts across the globe.

The UAE's hosting of the COP 28 means there is a window of opportunity to influence the government and secure better protections for 9 million migrant workers in the country, including by ensuring that labour rights and the fundamental right to freedom of association are at the core of sustainability initiatives aimed at addressing the climate crisis in the UAE and globally. At the heart of the problem is the UAE's labour sponsorship system ('Kafala') that binds workers to their sponsoring employers and prevents them from changing jobs or leaving their country without their permission. The Kafala system sets up a system of structural discrimination against non-citizens, a de-facto caste system based on national origin. Laws designed to protect migrant worker rights are poorly enforced and workers can face systematic discrimination and significant challenges accessing justice.

#### Government and company responses to our findings

Prior to publication, Equidem shared its findings in writing with the UAE government, Expo City Dubai, the UNFCCC Secretariat, and all the companies mentioned in this report. Unfortunately, only some of these actors decided to respond. All of the written responses received by Equidem have been reproduced in full in the annexes to the report.

Siemens Energy said:

As a company, we are committed to upholding the highest standards of ethical conduct, including the protection of human rights and the prevention of labor exploitation. Our Code of Conduct for Suppliers . . . outlines our expectations for our business partners, and we take any violations of these standards very seriously. In addition, our human rights policy statement . . . clearly states our commitment to

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upholding the human rights of all individuals affected by our operations. We would like to conduct a comprehensive assessment of the situation and are looking forward to collaborate with you to address the concerns that have been raised.

Expo City Dubai said:

Will you please share details of the companies and, where possible, the workers, in order for us to fully investigate and rectify any issues. As you are aware from your previous dealings with our Worker Welfare team, we have robust policies and procedures in place specifically to handle such cases. If the workers are not comfortable providing their names, they are encouraged to call the hotline (800 WORKER) in order for their complaints to be addressed. As a user of the hotline acknowledges on page 12 of your letter, "those [issues] that I have had were dealt with effectively".

Conclusion

Climate change represents the most significant threat to the safety, security, and rights of people and communities worldwide. On the eve of COP 28, the fifth meeting of the Transitional Committee (TC) of the UN Loss and Damage Fund met in Abu Dhabi, the capital of the United Arab Emirates. In its proposal for the establishment of the fund it noted that:

"Climate change is a common concern of humankind and that Parties should, when taking action to address climate change, respect, promote, and consider their respective obligations on human rights, the right to a clean, healthy and sustainable environment, the right to health, the rights of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity."

Equidem's research starkly reveals that the UAE is failing on almost every metric of the UN's own human rights benchmarks for addressing climate change through the COP process. This report

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speaks to the urgent need to protect labour rights and eliminate discrimination faced by migrant workers employed on vital climate-related infrastructure projects, such as renewable energy and infrastructure projects. It also highlights the stark disparities and contradictions faced by low-paid, low-wage migrant workers who endure exploitation and abuse while striving to achieve climate goals, both in the industrial and service sectors in the UAE—especially vulnerable migrant worker communities who are compelled to migrate to the UAE due to climate-related disasters in their home countries. The absence of key labour protections and inadequate enforcement of laws in the UAE results in serious labour exploitation and hinders access to justice for migrant workers. These issues are rooted in the lack of democratic power for workers and is reflected in other human rights issues including the targeting of rights activists, restrictions on freedom of expression, the enactment of repressive laws, the abuse of the criminal justice system, and the mistreatment of women and LGBTQI communities.

It is the duty of states, business entities, and international systems to identify, address and mitigate potential adverse outcomes of climate change and ensure a fair and just transition while upholding labour and human rights. That is simply impossible in the United Arab Emirates while the authorities maintain and expand an economy based on fossil fuels, restricting fundamental labour and human rights including freedom of association, and failing to adequately enforce existing protections.

Businesses operating in the UAE must also be accountable for protecting the human rights of migrant workers. Considering the rights violations covered in this report, Equidem calls upon companies in the renewable energy sector, construction, and in the delivery sector to adopt the recommendations noted below, not only in the UAE but also across all their supply chains. Equidem further calls on the Conference of the Parties of the UN Global Framework Convention on Climate Change (COP 28) to ensure that the global climate agenda includes urgent attention to decent work for the migrant communities most impacted by rising temperatures across the globe. In the absence of addressing these critical responses to the climate crisis, the United Arab Emirates, the international community, and businesses are leading our planet to an unjust transition that entrenches and exacerbates existing inequalities.

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Detailed breakdown of findings

## A. Climate driven migration

58 out of the 102 migrant workers interviewed by Equidem (57%) came from climate impacted areas of Asia and Africa.

Asian and African migrant workers employed at Expo City Dubai and in the renewables and delivery sectors in the UAE migrate for employment in response to climate impacts in their home areas that have affected their ability to support themselves and their families. Fifty-eight of the 102 workers Equidem spoke with come from regions that have been impacted and even devastated by extreme weather and climate change. An Indian worker employed as a solar panel installer described migrating to the UAE due to flooding:

Every year in my area, there is flooding during the rainy season due to which there is a lot of damage to agriculture and crops. Those doing agriculture work in our area face a lot of difficulties. There is no use in farming. That's why I have come here to work.

Workers interviewed by Equidem migrated for employment to the UAE from the Philippines, Mozambique, Bangladesh, Pakistan, and Nepal—five of the ten countries most affected by climate change between 2000 and 2019. For example, one Pakistani worker employed at Mohammed bin Rashid Al Maktoum Solar Park, United Arab Emirates described migrating to the UAE after his hometown was flooded and the business he worked for was destroyed:

The last place I worked was a pharmaceutical company. I had to leave my job because of rains and floods, due to which interior Sindh basically drowned. Because of that, the company could not manage to sell their products anymore and I had to leave my job.

Climate related migration encompasses not only major weather events but also less recognized climate events. Equidem research identified climate impacts in the local villages and communities of the migrant workers interviewed for this study—revealing a striking pattern of migration from areas

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impacted by drought, floods, heavy rainfall, landslides, mudslides, tropical storms, industrial pollution, and disease outbreaks.

## B. Heat stress

Climate related impacts have significant consequences for workers employed in the industrial and service sectors, especially in the UAE where temperatures are particularly high. Due to the regional climate, characterised by dry and subtropical desert conditions, workers employed outdoors are exposed to heat-related risks. During the summer, temperature and humidity levels are high and rainfall is scarce. Between April and September, temperatures can reach 55°C (131°F) even in the shade, with humidity exceeding 80 per cent. Negative health impacts linked to prolonged exposure to hot environments include heat stress leading to dehydration, heat fatigue, heat rash, heat syncope, heat cramps, rhabdomyolysis, heat exhaustion, heat stroke and death.

### Heat stress at Expo City Dubai

A migrant woman worker employed as a waitress in Expo City Dubai, United Arab Emirates reported exposure to the heat since her workstation is outside:

I am exposed to excessive temperature and heat since I work in an open venue.

A migrant woman worker employed in food services at Expo City Dubai United Arab Emirates described being fearful of getting skin cancer due to high levels of exposure

I am exposed to the heat which is a problem and can cause skin cancer if I work there for a long time.

### Health impacts due to heat exposure among workers employed in the renewables sector

Workers interviewed in the renewable sector said they are made to engage in heavy physical activity under extreme heat. A worker from South Asia employed by a subcontractor for a major

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infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park described this impact:

I am exposed to high temperatures in the park which leads to heat rashes and heat strokes from working under the sun. I often have skin rashes due to excessive sweating.

A Kenyan worker employed by a subcontractor for Siemens Energy, United Arab Emirates as a security guard described heat stress associated with her work:

This job causes very serious health issues. Sometimes I am made to stand for more than 10 hours in the scorching sun, and this gives me a constant headache all the time. I must take painkillers to cool it down which isn't good for my health.

#### Health impacts due to heat exposure among workers employed in the delivery sector

Delivery workers are particularly vulnerable to extreme heat exposure as they spend long hours exposed to the heat, especially by riding motorbikes. In many cases they lack a company-mandated health insurance policy, increasing their risks to dehydration, heat exhaustion, and even heat stroke, which are often undiagnosed or untreated and can be fatal. A Bangladeshi delivery service worker employed by a subcontractor for Talabat, United Arab Emirates reported extreme difficulty driving in the hot summer:

The weather here is very hot. In this summer we ride at 80 to 100 speeds, and this makes us sick sometimes.

A Pakistani delivery service worker employed by a subcontractor for a food delivery company in the United Arab Emirates described health impacts of moving between extreme heat outdoors and air conditioning indoors up to 40 times a day:

The heat is extreme in the summer. Sometimes the temperatures are as high as 45 degrees. The temperature inside the mall fluctuates between 20 and 24 degrees Celsius. Throughout the day, we experience this temperature shift at least 30 to 40 times, and it makes us sick.

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### C. Risk factors for human and labour rights violations in the UAE

The rights violations documented in this report are rooted in laws and employment practices in the UAE and other Gulf Cooperation Council (GCC) states that ensure that renewable and delivery sector employers have access to a hiring pool of migrant workers, while systematically excluding these workers from adequate labour, employment, and social protections. This imbalance between worker and employer power poses significant risks for unchecked rights abuses, including nationality-based discrimination, wage theft, understaffing and overwork, workplace violence and harassment, health and safety risks, and sudden loss of employment. Risk factors for labour and human rights abuses in the UAE include widespread employment of migrant workers in temporary positions, where workers are subjected to employer control without adequate labour standards protections, including the freedom of association protections required to enforce labour standards.

#### Collective action in response to wage decrease

Workers employed by a food delivery company recounted the success of their strike during the Muslim religious festival of Eid in 2022 to protest a cut in their wages. A Pakistani national employed by a subcontractor for a food delivery company recounted the worker's strike:

Last year, around Eid, there was a strike because of a decrease in our wages. The workers then refused to work. Then the [company's] representative said they did not even know this wage decrease had happened and they reverted their decision. They sent an email saying "I don't even know how the rate was reduced. You will get the same rate. You continue your work." I think the wage was fine but decreasing it was unfair.

#### Retaliation for collective action

Workers in the delivery service sector in the UAE reported, however, that there are strict consequences for collective action in response to unfair working conditions: termination and

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deportation. A Nepali national employed by a subcontractor for Talabat described the disciplinary action faced by hundreds of Pakistani workers who called for increased delivery fees to match the rising costs of fuel:

After the fuel prices increased, some Pakistani nationals protested in the company demanding to raise the per delivery rate. They were instead sent back to their home country... There were 300-400 Pakistani nationals protesting and were sent home.

#### Exploitation at Expo City Dubai

- Addressing long-drawn criticisms on labour violations in the UAE, Expo City Dubai has developed a ten-principle worker welfare policy, that all employers working within the Expo City Dubai are required to follow. Since Expo City Dubai is a free zone, the workers are governed by these employment rules and regulations set by the free zone authority, and not by the UAE Labour Law. Despite the worker welfare policy, research by Equidem has documented violations of almost all ten principles by multiple employers—including nationality-based discrimination and racism, illegal recruitment fees, understaffing, extended working hours, verbal abuse, underpaid and unpaid overtime, delayed payments, wage stagnation, failure to provide sick leave, food insecurity, heat stress, exposure to toxic cleaning materials, overcrowded and unhygienic accommodations, and challenges accessing grievance channels.

#### D. Exploitation at Expo City Dubai, and in the renewable and delivery sectors in the UAE

##### Race and nationality-based hierarchy and discrimination

Article 1 of the Convention on the Elimination of All Forms of Racial Discrimination (CERD) expressly prohibits state exclusion based on national origin that nullifies or impairs human rights. UAE law also prohibits discrimination and hatred based on caste, race, religion or ethnic origin. Article 4, Equality and

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Discrimination, of Federal Decree-Law No.33 of 2021 prohibits discrimination which prejudices equal opportunities in employment, equal access to jobs and continuity of employment.

However, 65% of the Asian and African migrant workers employed in the renewables sector interviewed by Equidem described experiencing widespread discrimination based on race or nationality. Forms of employment discrimination reported by workers include discrimination in hiring and termination, lower wages, payment delays, extended working hours, selectively granting leave to workers from particular nationalities, and derogatory comments from supervisors. A South Asian worker employed at the Sir Bani Yas Wind Farm, reported wage discrimination, discrimination in allocation of work, and assignment of longer hours on the basis of nationality:

The Asians are getting less wages than the Arabs which is not making any sense since we are both working the same jobs but getting different salaries. They also discriminate against us in terms of work division. We work longer hours. Arab workers come to work later, but if we are late, they reduce our salary.

Despite the anti-discrimination clause in the Expo City Dubai worker welfare policy, workers reported to Equidem that companies still prioritise a candidate's nationality over their skillset in determining their job profile, wages, and associated benefits. Echoing what other workers told Equidem, a migrant worker employed in food services at Expo City Dubai described discriminatory treatment from his supervisor:

There is colour discrimination. I see white workers get better treatment from my boss. You can tell when he's under pressure from the customers, but I don't hear him yelling at the European workers.

#### Lack of opportunities for promotion

Structured opportunities for advancement link promotion to experience and skill upgradation rather than nationality-based preference. Asian and African workers in the renewables sector in the UAE,

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however, described barriers to advancement, even after long periods of employment. A woman worker from Southern Africa employed as a sales representative for Siemens Energy reported that they did not receive the promotion promised in their contract:

They promise promotions every year in the contract, but I have been in the company for a long time and still have not received any promotions.

Clearly defined, skills-based pathways for advancement facilitate diversity among higher skilled employees, and ultimately increase job satisfaction and worker productivity. The absence of these pathways in the renewables sector in the UAE demonstrates the need for further efforts by global renewable sector companies, their subcontractors, and the UAE government to extend good practices for expanding equal opportunities across the UAE.

#### Recruitment fees

UAE law requires recruitment costs to be borne by the employer and calls for employers to perform due diligence measures, including checking whether recruitment fees have been paid or providing employees with written information on their rights at work. UAE legislation also prohibits recruitment agencies from soliciting or accepting any fees from workers.

Despite these protections, 62 of the 102 African and Asian migrant workers we interviewed for this study (constituting 61%) indicated that they paid fees during the recruitment process. 73% of the African and Asian migrant workers employed in the renewables sector that Equidem interviewed reported paying illegal recruitment fees, ranging from USD 250 to USD 1,300.

Consistent with UAE law, the principles of the Expo City Dubai Worker Welfare Policy also call for employers to ensure fair and free recruitment. But migrant workers working in Expo City Dubai, continue to pay hundreds of dollars in illegal fees to recruitment agents to secure their jobs.

#### Understaffing, over work, and extended hours

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Under UAE labour law, normal working hours for the private sector are eight hours a day and workers may not work for more than five consecutive hours without a break of not less than an hour, two overtime hours a day, or more than 144 hours during a single three-week period. Despite these protections, Asian and African migrant workers in the UAE described understaffing in their departments, requiring them to complete physically intensive work for extended hours and days on end without a break.

Asian and African workers reported working more than ten hours a day, six days a week without overtime pay due to understaffing across the renewables sector. Some workers reported that they worked up to 84 hours a week. For example, a Kenyan worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported working 12 hours a day and 84 hours a week. Another worker from East Africa employed by a subcontractor as a solar installer at Al Dhafra Solar Plant reported working 10-11 hours a day and around 66 hours a week. A Bangladeshi worker employed by a subcontractor at Noor Abu Dhabi Solar Plant reported working 11 hours a day and 60-70 hours a week. A worker from West Africa employed as a solar parts delivery driver reported working 12 hours a day and 72 hours a week without receiving overtime pay. A Ugandan worker employed by a subcontractor for Siemens Energy described being required to do the work of two people in unloading solar systems:

We are a group of 10 drivers in the busy city. This is not enough people to manage the amount of work. I always find myself doing the work of two people - from delivering the systems to offloading them without getting help.

A Bangladeshi worker employed in construction at Mohammed bin Rashid Al Maktoum Solar Park through a subcontractor reported that he was made to work unpaid overtime hours when unable to complete work assignments:

Sometimes I cannot manage to finish on time, and I am forced to extend for an extra hour without pay.

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The Expo City Dubai Workers Welfare Policy calls for a safe and healthy working environment. Equidem research found, however, that migrant workers in Expo City Dubai are also required to work long days, sometimes lasting up to 12 hours each day, with only one day of rest each week. A security guard from Western Africa employed through a subcontractor, described understaffing and overwork:

In my department, there are 20 security officers. The company hasn't hired enough. Sometimes I need a reliever to take a break and I don't get one. I have to work extra hours and even work without days off. It is not manageable. I usually work 12 hours a day and the normal working hours in the UAE are supposed to be 9 hours a day

Violating UAE labour law, workers employed in the delivery sector, reported being required to work 12-to-14-hour shifts, 7 days a week.

### Wage theft

Denial of wages and employment benefits, whether under written or unwritten employment agreements, has a devastating impact on workers across the global economy. These well documented practices of denying workers owed wages are called "wage theft." Despite laws protecting the right to overtime pay in the UAE, Equidem research found rampant wage theft practices—including non-payment and underpayment of owed wages, irregular and delayed payments, underpayment of contractually promised wages, and wage stagnation.

### Non-payment and underpayment of overtime

African and Asian migrant workers employed in the renewables sector reported non-payment and underpayment of overtime. A Bangladeshi worker employed by a subcontractor at Noor Abu Dhabi Solar Plant reported working 11 hours a day and 60-70 hours a week without receiving overtime payments:

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They don't pay overtime even though I work extra hours and they promised they would pay me extra.

#### Irregular and delayed payments

Under UAE law, wages are to be paid at least once a month and within the first 15 days following the period of employment. Despite legal guidelines governing wage payments, African and Asian migrant workers reported irregular and delayed payments. An East African worker employed by a subcontractor for Siemens Energy as a security guard reported significant delays in receiving her salary:

They delay my salary up to two to three months. When I ask why it's delayed, they will at the most pay half of what they owe. My overtime is delayed together with the salary.

A worker from West Africa employed as a solar parts delivery driver described challenges related to managing family finances and maintaining food security:

My salary is not paid on the same date... This is inconvenient for my wife and kids back at home. They are forced to wait for a long time before they can have a decent meal or pay the bills.... [It] makes it difficult for me to afford food. Sometimes I go to bed hungry.

#### Unfair salary deductions

A South Asian worker employed by a subcontractor for Talabat described unfair salary deductions:

I had a verbal agreement with the employer that the company would facilitate the visa process and, in return, deduct 5,000 dirhams [USD 1361] from my salary over time with a monthly payment of 100 dirhams [USD 27]. I have already repaid this amount, but the company continues to deduct 100 dirhams from my salary—now stating that it is for insurance.

A South Asian delivery service worker said that his employer made him sign a fraudulent document stating he had taken advance payment from the company—and used this document to systematically deduct 500 dirhams from his salary each month:

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The company made a fraudulent document saying that I had received 14,000 dirhams [USD 3,812] in advance payment from the company. I was asked to sign it in [the subcontractor's] office. I did not agree to this. They deduct 500 dirhams [USD 136] from my salary each month. They did not give me a copy of the document, nor are they providing any payment slips.

### Wage stagnation

Despite rising costs of living across the UAE and globally, African and Asian migrant workers reported stagnant wages—with some receiving the same wages in 2023 as they did in 2017. A worker from Southern Africa employed as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park reported that his salary had not been raised in five years:

They pay the salary on time, but it's been the same for the last five years I have worked with them. There has been no increment or anything like a bonus or extra even if we reach the target as a team.

A woman worker from Southern Africa employed as a sales representative for Siemens Energy reported that she did not receive the pay increase she was promised:

Siemens promised a pay increase every economic year but since 2018 they haven't increased the wages and life has really gone up in the UAE.

### Workplace violence

Article 14, Federal Decree-Law No.33 of 2021 regarding the Regulation of Employment Relationship prohibits sexual harassment, bullying, and verbal, physical, and psychological violence:

Sexual harassment, bullying or any verbal, physical or psychological violence committed against the worker by the employer, his superiors at work, colleagues or the persons who work with him, are prohibited.

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Despite these protections, however, workers reported workplace violence—including one case of sexual violence and rampant verbal abuse.

#### Sexual harassment at work

A worker from East Africa employed by a subcontractor for Siemens Energy as a security guard described sexual harassment at work:

My supervisor is always approaching ladies sexually and if I refuse his advances, he might not give me my weekly off which I feel is unfair.

#### Physical violence

A South Asian migrant worker employed packing solar equipment for a company in Abu Dhabi reported physical violence, especially targeting new workers:

If a worker does not listen to the officer or is found resting during work, the officer gets angry and sometimes he slaps in anger. Once a worker who worked with me burnt his hand and was sitting and resting. Then the supervisor came and slapped him without asking anything and was shouting abuses at him. This mostly happens with new workers.

#### Verbal abuse

Asian and African migrant workers described verbal abuse taking the form of regular and relentless yelling, abuses in Arabic, racism, and public humiliation. A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard reported that it was very common to be yelled at and spoken to rudely by supervisors:

Getting yelled at and spoken to rudely is very common. My supervisor even goes to the point of saying we are the poorest people in the world... Facing people every day who don't appreciate the work I do and see me as uneducated really breaks my heart.

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The Expo City Dubai Workers Welfare Policy calls upon employers to protect and preserve the dignity of employees and not tolerate harassment or abuse of any kind. Violating this policy, workers reported verbal abuse from their supervisors. A worker from West Africa employed as a sales assistant in Expo City Dubai described verbal abuse at work:

My supervisor is the worst person I have ever worked with. She is racist and yells at African workers more. One time she yelled at me because I mistakenly charged the customer twice... Mentally, it has drained me, and I am not psychologically the same as I used to be.

Workers employed in the delivery sector by food delivery companies including Talabat also reported verbal abuse. A South Asian worker employed by a subcontractor for a food delivery company reported verbal abuse from the supervisor:

In instances where we experience delays due to heavy traffic, which is beyond our control, the supervisors shout at us.

#### Forced labour indicators in the delivery sector

Asian migrant workers employed in the delivery sector in the UAE described a cluster of forced labour indicators—including debt to the employer, holding identity documents, deceptive recruitment, excessive overtime, and withholding wages.

#### Waiting in the UAE for employment

Workers employed by subcontractors for food delivery companies including Talabat reported subcontractor practices of requiring workers to wait for nine to ten months within the UAE without employment due to delays in processing their licenses. These practices allow delivery companies and their subcontractors to access workers who are on-call and ready to start working without bearing any costs until the period of employment begins. A South Asian delivery service worker employed by a subcontractor for Talabat said:

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I have been in the UAE for 18 months now. For the first 10 months I was unemployed. The vendor (contractor) finally gave this job after waiting for 10 months. I had to bear all cost of food and accommodation for 10 months on my own.

#### Debt to the employer

Delivery service workers employed by subcontractors for food delivery companies including Talabat reported taking loans from their employers to cover work-related costs that the employer is legally required to cover at their own expense. A delivery service worker employed by a subcontractor for Talabat described being unable to leave his job until he repaid the company for expenses the employer is legally required to cover:

Each month the company deducts 300 dirhams [USD 82] from my salary. I owe them 7,300 dirhams [USD 1,988] for my visa and license fee. We can go to other companies only after paying our visa and license fee.

A South Asian delivery service worker employed by a subcontractor for Talabat reported not being able to change jobs or leave the country without clearing his debt with the company:

First workers must clear any debt they have. My friend had to pay his license fee. He could not go home because he had not cleared his debt.

#### Holding identity documents

Despite laws preventing employers from holding worker passports, migrant workers employed in the UAE delivery sector said that employers hold their passports, preventing them from leaving their jobs and seeking new employment opportunities. This inability to seek alternate employment provides workers with a disincentive for reporting rights violations. A delivery service worker employed by a subcontractor for a food delivery company said his passport would only be returned after he finished paying off the debt incurred to the employer for paying off his license and visa:

My company is in possession of my passport and I am unable to retrieve it without paying the full expenses for the license and visa, which amounts to 9,000 dirhams [USD 2,400]. The

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company insists on deducting these expenses from my monthly salary, and I can only reclaim my passport after these costs have been completely covered.

#### Deceptive recruitment practices

Workers employed in the food service delivery sector by subcontractors for food delivery companies including Talabat described being presented with terms of employment during the recruitment process that were not upheld once they reached the UAE.

#### Health and safety risks

##### Mental health impacts

A worker from East Africa employed at Mohammed bin Rashid Al Maktoum Solar Park described the impact of long working hours on her mental and emotional health:

I am not okay mentally and emotionally. I work many hours without rest, and I don't have time to live a normal life. I don't get to socialise as I am almost always working.

A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park described the impact:

My mental health is at risk since it's a demanding job and I don't have enough time to even chat with my loved ones.

##### Occupational hazards

Although the Expo City Dubai Workers Welfare Policy calls for a safe and healthy working environment, workers on the site are exposed to occupational health and safety risks. An East African worker employed as a cleaner through a subcontractor described allergic reactions to the cleaning materials used at work:

The chemicals I use to clean might cause allergic reactions to my skin - and this will cost me money to see a doctor and get treatment.

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## Risk of deadly accidents

A South Asian delivery service worker employed by a subcontractor for a food delivery company explained how his colleague died due to lack of awareness of traffic rules:

Just a few months back, a new Pakistani rider died in an accident due to heavy traffic. He was new to traffic rules here. He died in his first day of duty.

Another South Asian delivery service worker employed by a subcontractor for Talabat described a high risk of deadly accidents for delivery workers on bikes:

This is a highly risky job considering the congested and fast-paced road conditions. Many Nepalese individuals have tragically lost their lives here. Being fortunate enough to survive a single week without an accident is considered a significant achievement, and for newcomers, the challenges are even more difficult.

## Denial of paid sick leave

UAE labour law protects the rights of workers to paid sick leave following probationary periods. Despite these protections, African and Asian migrant workers reported inability to access paid sick leave. A Sri Lankan worker employed by a subcontractor in construction at the Mohammed bin Rashid Al Maktoum Solar Park reported that workers do not receive paid sick leave, even when they sustain injuries at work:

When I was carrying a brick and it slipped from my hand, it broke into pieces. I was told it will be deducted from my little salary and next time I will be terminated.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard described denial of paid sick leave:

Sick leave is not given and if it's given one will not receive the pay for that day.

A security guard from Western Africa employed through a subcontractor at Expo City Dubai, reported that he did not get paid sick leave:

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Sick leave is given unpaid, so we prefer to report to work sick and persevere, so we don't miss the day's wages.

Workers employed by subcontractors for food delivery companies including Talabat also reported difficulty getting sick leave, and if they are granted leave, getting unpaid sick leave. A South Asian delivery service worker employed by a subcontractor for Talabat reported that he was not entitled to paid sick leave.

There is no sick leave. If I get sick, I let my supervisor know and do not go to work. I am not getting paid for the days I do not work.

#### Inhuman living conditions

African and Asian migrant workers employed in the renewable sector described completing long days at work and returning to overcrowded accommodations. They also described inability to afford nutritious food.

#### Overcrowded accommodations

An East African worker employed by a subcontractor for Siemens Energy reported sharing with nearly four times the number of workers specified in his contract:

My accommodation is shared among 19 people, and this is extremely congested. My contract says I will be sharing with only 5 workers.

A worker from South Asia employed by a subcontractor as a solar panel installer for a major infrastructure company at Mohammed bin Rashid Al Maktoum Solar Park explained that besides resting and sleeping, there is no room in his shared accommodation for anything else:

Accommodation is provided in a small apartment shared with 15 men in a single room. We are limited to resting and sleeping. There is no space to do anything else.

In stark violation of the commitment made in the Expo City Dubai Workers Welfare Policy to a safe and healthy working environment, African and Asian migrant workers living in employer-provided housing

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reported crowded and unhygienic accommodations. A West African worker employed as a sales assistant described living in overcrowded and poorly ventilated accommodations:

I share a room with 15 other workers. This is not healthy. There is no proper ventilation in the room where I stay.

### Food insecurity

African and Asian migrant workers described inadequate access to nutritious food due to low food allowances. All the workers Equidem spoke to reported that they did not have cooking facilities in their accommodations and therefore had to either buy prepared food or eat in the company canteen. Some workers described food in company canteens as unpalatable. African and Asian migrant workers not only reported that their food allowances were insufficient to cover their medical needs but also reported receiving their food allowances late. To manage, workers reported skipping meals and buying food on credit. A worker from West Africa employed by a subcontractor for Siemens Energy as a security guard reported an inadequate food allowance:

Our food allowance is very low compared to the food costs in the market and it cannot take me through the whole month. I have to skip some meals. To make it worse, we are not allowed to cook or bring food from outside, making it even more difficult to store the food.

A migrant woman worker employed as a waitress in Expo City Dubai described inability to afford nutritious food:

I can't afford healthy food. I end up using my tips to buy food because they give us the same food all the time in [the restaurant] when we are working. They sell us food in the accommodation.

### Challenges accessing company grievance channels

An East African worker employed as a security guard described the benefits associated with the Expo City Dubai helpline:

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For Expo City Dubai they have a helpline where your complaints can be logged in anonymously if you choose so. It is managed by an external company (subcontractor). Complaints that are not anonymous tend to put you in a corner sometimes but those that I have had were dealt with effectively and didn't really require anonymity.

Workers hired through subcontractors on the same site, however, described a different experience. A worker employed in the service sector through a subcontractor described raising a complaint around her hours and receiving no relief:

I made a complaint about my schedule to be changed and spoke to my manager. He said he would see what to do, but my issue was never addressed. I am still doing the same long schedule.

A South Asian worker employed by a subcontractor for Talabat reported that despite reporting payments below the contractually agreed amount, he got no response from the human resources manager or supervisor:

I have complained to my employer. I did not get paid according to my written agreement. I submitted a complaint to the HR manager and supervisor. I complained but nothing happened. Since I paid a lot of money to come here, I have no choice but to keep working.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported that he received no response when he lodged complaints through the subcontractor:

Several of us have registered complaints with the [subcontractor], but regrettably, they have not taken any action. We were explicitly instructed not to lodge complaints directly with Talabat. Instead, we were told to channel our complaints through the company, and they assured us they would forward the concerns to Talabat. Unfortunately, despite this process, no resolutions or actions have been taken to address our complaints.

### Challenges in seeking relief through government channels

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A South Asian worker delivery service worker employed by a subcontractor for Talabat explained that the time required to pursue complaints creates a financial burden since payment is determined by deliveries completed:

I never approached any court or police station. Usually, our complaints are settled between us. It is very difficult to submit a complaint here. There is this thing of added financial burden. In our work, payment is determined by time.

## Recommendations

### United Arab Emirates government

#### Respect migrant worker human and labour rights

- Extend labour rights protections to all migrant workers.
- Ensure all workers are paid equally for equal work, regardless of their nationality or any other protected characteristic.
- Strengthen, implement and enforce the prohibition on discrimination as outlined in Federal Law No. 33, addressing both direct and indirect forms of discrimination and extend these protections to all workers regardless of their nationality or occupation. Consistent with ILO recommendations, ensure that the prohibition on discrimination includes a specific provision defining and explicitly prohibiting both direct and indirect discrimination.
- Allow migrant workers to switch jobs and depart the country without requiring their employer's consent, guaranteeing that all migrant workers can change jobs without prior approval, penalties from their current employer, or jeopardising their right to reside and work in the UAE.
- Provide long-term migrant workers with the opportunity to apply for permanent residency and citizenship.

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- Protect migrant workers from paying recruitment fees for their employment and initiate investigations and legal actions against employers and recruitment agencies that impose such fees on workers.
- Permit independent observers access to the UAE to monitor the human rights situation in the country, including with respect to migrant workers, and issue an open invitation to all United Nations Special Procedures so that independent UN experts can review the UAE's compliance with its international human rights obligations.

#### Heat stress and other occupational health and safety risks

- Amend climate-related outdoor working hour bans to reflect real-time temperature, humidity and workload for all outdoor worksites.
- Safeguard workers from extreme heat exposure by enacting legislation that mandates employers grant workers breaks of appropriate duration in cooled, shaded areas when occupational heat stress is a potential hazard. These mandatory break times should consider both environmental heat stress risks and the physical demands of the job.
- Mandate that employers provide workers with easy access to water and refrigerated food storage facilities at work sites, along with fully air-conditioned accommodation and work rest areas.
- Ensure that migrant workers are comprehensively informed about these regulations and receive adequate training.
- Ensure that essential healthcare services for low-income migrant workers are provided free of charge, regardless of their immigration status or possession of identity documents.
- Establish well-resourced clinics and emergency rooms near areas with significant populations of low-paid migrant labourers.

#### Freedom of association and collective bargaining

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- Pass legislation recognising workers' right to freely associate, organise, bargain and form a trade union in line with international labour conventions.
- Ratify the International Labour Organization Conventions on Freedom of Association and the Right to Organize (No.87) and the Right to Organize and Collective Bargaining (No.98), as well as the 2014 Protocol to the Forced Labour Convention (No.29).

#### Forced labour

- Respect and take action to uphold migrant workers' right to freely change jobs without prior permission or penalties
- Proactively investigate indicators of forced labour and punish with criminal sanctions where appropriate. All breaches of the labour laws and the sanctions imposed should be published on a regular basis and be made publicly available.

#### Access to justice

- Publicly release labour complaint information through an independent and impartial mechanism.
- Ensure that those seeking redress through the Ministry of Human Resources and Emiratization (MOHRE) or the labour courts can access independent and professional advice and representation.
- Establish and enforce a whistle-blower protection law in line with international human rights law and standards.
- Bring to justice individuals and organisations responsible for the exploitation of migrant workers in line with international human rights standards.
- Publish data on the number of people using the complaints procedures on a regular basis and make this publicly available. This information should be provided for cases addressed through both mediation and the labour courts and include the nature of the grievance and the outcome of the process.

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- Take urgent action to ensure that all people in the UAE have equal enjoyment of their human rights, including the right to freedom of peaceful assembly and to freedom of association, and freedom from persecution, discrimination or exploitation.

#### Migrant worker country of origin states

- Enhance and enforce existing protections against deception, coercion, fraud and other forms of exploitation with respect to the recruitment of migrant workers.
- Enact and enforce prohibitions on the charging of fees to workers in their recruitment to the UAE, in line with and other international standards.
- Prosecute individuals and business within jurisdiction responsible for recruitment-related and other exploitation of migrant workers.
- Provide effective and adequate consular, social and labour claim support to migrant worker nationals subjected to exploitation in the UAE.
- Work with the UAE authorities, business and civil society to investigate complaints of labour exploitation and establish effective mechanisms for workers to safely lodge complaints from the UAE and when they have returned to their country of origin and obtain remedies and rehabilitative support.

#### Businesses in the United Arab Emirates

- Publicly commit to respecting human rights and labour rights and put in place adequate and transparent mechanisms to identify and prevent abuses due to business activities across the business and in supply chains.
- Review business practices and policies to ensure that the company does not commit or materially assist in the commission of acts that lead to human rights or labour rights abuses.

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- Require full disclosure from all partners, clients and suppliers, and publish a list of all contractors, suppliers and companies in value chains.
- Seek expert guidance, including that of civil society, to embed the United Nations Guiding Principles on Business and Human Rights (UNGPs) and other relevant international standards across business activities.
- Ensure workers can exercise their right to freedom of association, right to organise, engage in collective bargaining and collective representation, and freedom of speech.
- Actively develop and encourage industry bodies that seek to advance and implement international standards on business and human rights, including but not limited to protections for whistle-blowing and human rights defenders.

#### International Businesses and Investors in the United Arab Emirates

- Divest from projects and partnerships where partners in the UAE fail to address human and labour rights abuses including the practices documented in this report.
- Develop and implement policies and practices on business and human rights in line with the UNGPs and other relevant international standards that partners and contractors in the United Arab Emirates must respect as a legal requirement for doing business with you.
- Share specialist knowledge and expertise on business and human rights with counterparts and partners in the United Arab Emirates, including but with respect to the elimination of all forms of racial, gender, sexuality and other forms of discrimination.
- Seek expert guidance, including that of civil society, on how to identify, prevent and mitigate human rights risks due to business activities in the United Arab Emirates.

#### UN Framework Convention on Climate Change Secretariat

- Ensure that at future COP summits there is a set of human rights and climate-related criteria that countries must fulfil to be appointed to the COP Presidency including

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respecting international human and labour rights and working towards the rapid, just phase-out of fossil fuels.

- Investigate all the instances of human and labour rights abuse documented in this report and ensure all victims can access justice and remedies and work with the UAE authorities to ensure those responsible face criminal and civil penalties as appropriate.

Table 1: Rights violations by sector

<p>Renewable Sector</p>	<ul style="list-style-type: none"> <li>• Race and nationality-based discrimination and hierarchy</li> <li>• Lack of opportunities for promotion</li> <li>• Recruitment fees</li> <li>• Understaffing and overwork</li> <li>• Extended hours</li> <li>• Wage theft</li> <li>• Failure to pay overtime</li> <li>• Irregular and delayed payments</li> <li>• Wage stagnation</li> <li>• Sexual harassment at work</li> <li>• Physical violence</li> <li>• Verbal abuse</li> <li>• Heat stress</li> <li>• Risk of injury at work</li> <li>• Denial of paid sick leave</li> <li>• Mental health impacts</li> <li>• Failure to provide paid sick leave</li> <li>• Overcrowded accommodations</li> <li>• Inadequate food and food allowance</li> <li>• Inadequate grievance procedures</li> </ul>
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	<ul style="list-style-type: none"> <li>• Fear of retaliation for reporting rights abuses</li> <li>• Threats of termination</li> <li>• Holding identity documents</li> </ul>
Delivery Sector	<ul style="list-style-type: none"> <li>• Waiting in the UAE for employment</li> <li>• Debt to employer</li> <li>• Holding identity documents</li> <li>• Deceptive recruitment practices</li> <li>• Excessive overtime and inability to take breaks</li> <li>• Withholding wages</li> <li>• Recruitment fees</li> <li>• Failure to provide a copy of employment contract</li> <li>• Delivery-based wages</li> <li>• Wage theft</li> <li>• Verbal abuse</li> <li>• Threats of fines, suspension, and termination</li> <li>• Risk of deadly accident</li> <li>• Health impacts – back pain, headaches, and dehydration</li> <li>• Denial of paid sick leave</li> <li>• Challenges in using health insurance</li> </ul>

Table 2: Rights violations by site

Expo City Dubai	<ul style="list-style-type: none"> <li>• Nationality based discrimination and racism</li> <li>• Recruitment fees</li> <li>• Understaffing and extended working hours</li> <li>• Verbal abuse</li> </ul>
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	<ul style="list-style-type: none"> <li>• Unpaid or underpaid overtime</li> <li>• Delayed payments</li> <li>• Wage stagnation</li> <li>• Failure to provide sick leave</li> <li>• Delayed and inadequate food allowance</li> <li>• Heat stress</li> <li>• Exposure to toxic cleaning materials</li> <li>• Overcrowded and unhygienic accommodations</li> <li>• Food insecurity</li> <li>• Challenges accessing grievance channels</li> </ul>
<p>Mohammed bin Rashid Al Maktoum Solar Park, Dubai</p>	<ul style="list-style-type: none"> <li>• Nationality based discrimination and racism</li> <li>• Understaffing and overwork</li> <li>• Extended hours</li> <li>• Heat stress</li> <li>• Verbal abuse</li> <li>• Threats of termination</li> <li>• Recruitment fees</li> <li>• Delayed payments</li> <li>• Non-payment and under payment of overtime</li> <li>• Wage stagnation</li> <li>• Inadequate food allowances</li> <li>• Occupational health and safety risks</li> <li>• Mental health impacts</li> <li>• Overcrowded and unhygienic accommodations</li> </ul>

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	<ul style="list-style-type: none"> <li>• Failure to provide paid sick leave</li> <li>• Ineffective grievance mechanism</li> <li>• Holding identity documents</li> </ul>
<p>Al Dhafra Solar Project, Abu Dhabi</p>	<ul style="list-style-type: none"> <li>• Recruitment fee</li> <li>• Extended hours</li> <li>• Health and safety risks</li> <li>• Heat stress</li> <li>• Understaffing and overwork</li> <li>• Non-payment and underpayment of overtime</li> <li>• Irregular and delayed payments</li> <li>• Wage stagnation</li> <li>• Verbal abuse</li> <li>• Exposure to occupational hazards</li> <li>• Denial of paid sick leave</li> <li>• Overcrowded and unhygienic accommodation</li> <li>• Inadequate food and food allowances</li> <li>• Holding identity documents</li> <li>• Inadequate grievance channel</li> <li>• Inadequate government inspections</li> </ul>
<p>Noor Abu Dhabi Solar Plant</p>	<ul style="list-style-type: none"> <li>• Extended hours</li> <li>• Verbal abuse</li> <li>• Overcrowded accommodations</li> <li>• Inadequate and delayed food allowances</li> <li>• Heat stress</li> </ul>

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	<ul style="list-style-type: none"> <li>• Nationality based discrimination and racism</li> <li>• Lack of opportunities for promotion</li> <li>• Extended hours</li> <li>• Non-payment and underpayment of overtime</li> <li>• Verbal abuse</li> <li>• Overcrowded and unhygienic accommodation</li> <li>• Inadequate food and food allowances</li> <li>• Holding identity documents</li> <li>• Inadequate grievance channel</li> <li>• Inadequate government inspections</li> </ul>
Sir Yani Bas Wind Farm	<ul style="list-style-type: none"> <li>• Nationality based discrimination and racism</li> <li>• Heat stress</li> <li>• Verbal abuse</li> </ul>

Table 3: Rights violations by company

Renewable sector	
Siemens Energy	<ul style="list-style-type: none"> <li>• Sexual harassment at work</li> <li>• Nationality-based discrimination</li> <li>• Failure to comply with contractual promises –promotion</li> <li>• Extended hours</li> <li>• Understaffing and overwork</li> <li>• Verbal abuse</li> <li>• Recruitment fees</li> </ul>

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	<ul style="list-style-type: none"> <li>• Delayed payments</li> <li>• Wage stagnation</li> <li>• Underpayment of overtime</li> <li>• Delayed and inadequate food allowance</li> <li>• Exposure to toxic cleaning materials</li> <li>• Ineffective grievance channels</li> <li>• Heat stress</li> <li>• Denial of paid Sick leave</li> <li>• Overcrowded accommodations</li> <li>• Holding identity documents</li> <li>• Inadequate grievance procedures</li> </ul>
Delivery sector	
Talabat	<ul style="list-style-type: none"> <li>• Debt to the employer</li> <li>• Holding identity document</li> <li>• Deceptive recruitment practices</li> <li>• Excessive overtime and inability to take breaks</li> <li>• Recruitment fees</li> <li>• Failure to provide a copy of employment contract</li> <li>• Delivery-based wages</li> <li>• Wage theft</li> <li>• Verbal abuse</li> <li>• Threats of fines, suspension and termination</li> <li>• Risk of deadly accidents</li> <li>• Health impacts – back pain, headaches, and dehydration</li> <li>• Denial of paid sick leave</li> <li>• Challenges in using health insurance</li> </ul>

Methodology

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The research for this report was conducted between February to November 2023 in the UAE and in countries of origin— Bangladesh, India, Nepal, Pakistan, Kenya, and Uganda. Our investigation includes the experiences of 102 migrant workers, including 48 migrant workers employed in the renewables sector, 11 migrant workers employed on the Expo City Dubai site, and 43 migrant workers in the delivery sector.

Table 4: Range of respondent occupations by sector

Renewable Sector	
Solar	<ul style="list-style-type: none"> <li>• Construction Safety Officer</li> <li>• Construction Worker</li> <li>• Crane Driver</li> <li>• Customer Service Representative</li> <li>• Driver</li> <li>• Mechanic</li> <li>• Electrical Supervisor</li> <li>• Electrical Technician</li> <li>• IT System Administrator</li> <li>• PV Technical Supervisor</li> <li>• PV Technician</li> <li>• Quality Control Inspector</li> <li>• Receptionist</li> <li>• Safety Officer</li> <li>• Security Guard</li> <li>• Solar Panel Installer</li> <li>• Solar Panel Technician</li> <li>• Warehouse Team Leader</li> <li>• Welding Supervisor</li> </ul>

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Wind	<ul style="list-style-type: none"> <li>• Wind Turbines and Windmill Transporter</li> <li>• Technician</li> </ul>
Retail	<ul style="list-style-type: none"> <li>• Packaging Worker</li> <li>• Procurement Officer</li> <li>• Sales Executive</li> <li>• Sales Representative</li> </ul>
Delivery Sector	
	<ul style="list-style-type: none"> <li>• Delivery Riders</li> </ul>

Worker interviews were carried out on a one-to-one basis. Our investigation included extended structured interviews, and shorter unstructured interviews. This approach allowed us to engage with the maximum number of workers employed on selected sites, utilizing a detailed questionnaire where possible, but also incorporating unstructured testimony when time and access constraints prohibited extended engagement. Worker testimony has been recorded exactly as they spoke to Equidem researchers during interviews, and we took every effort to corroborate worker claims against those of other workers and sources of information before publishing it in this report. Worker references to money, regarding salaries and recruitment charges, for example, have been converted to US dollars.

While research and documentation of labour and human rights violations often focuses exclusively on documenting violations, our research protocol sought to identify violations in relationship to employment practices in the renewables and delivery sectors in the UAE. Accordingly, interviews focused on not only understanding the experiences of individual workers, but also employment practices in the garment factories where they worked. We focused on the nature of work, wages and hours, occupational health, and safety, hiring and termination practices, and access to relief for rights violations.

Women and men working in low-wage jobs in the UAE live in an environment of high surveillance, little privacy, and significant physical and mental stress. As part of this extensive investigation, our

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investigators reached out to 248 migrant workers employed in the renewables sector, 77 migrant workers employed on the Expo City Dubai site, and 156 migrant workers in the delivery sector. While 102 workers agreed to have their experiences recorded, many others approached during this research refused due to fear of retaliation. In the light of the high level of risk workers face, all interviews were conducted with the informed consent of the participants in private locations to respect confidentiality in line with Equidem duty of care policy and procedures. All the workers interviewed requested that their identity not be revealed. Accordingly, we have not used any names in the report to shield workers from the risk of retaliation from their employers or the state. Due to security risks, we also replaced worker country of origin with region of origin within the body of this report.

### III. Climate Driven Labour Migration to the UAE

Asian and African migrant workers employed at Expo City Dubai and in the renewables and delivery sectors in the UAE migrate for employment in response to climate impacts in their home areas that have affected their ability to support themselves and their families. Many of the workers Equidem spoke with come from regions that have been impacted and even devastated by extreme weather and climate change. An Indian worker employed as a solar panel installer described migrating to the UAE due to flooding:

Every year in my area, there is flooding during the rainy season due to which there is a lot of damage to agriculture and crops. Those doing agriculture work in our area face a lot of difficulties. There is no use in farming. That's why I have come here to work.

Workers interviewed by Equidem migrated for employment to the UAE from climate impacted areas of the Philippines, Mozambique, Bangladesh, Pakistan, and Nepal—five of the ten countries most affected by climate change between 2000 and 2019.

Pakistan, for instance, is ranked as the eighth most vulnerable country to climate change, facing record rainfall and floods as well as heatwaves. In 2022 alone, record rainfall and flooding in Pakistan led to

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the death of more than 1,700 people, over 2 million homes damaged, more than 1.1 million livestock killed, and 9.4 million acres of crops inundated. These figures, moreover, do not include an account of the businesses and infrastructure that were destroyed. Recovery for Pakistani people is extremely difficult, driving many, including respondents we interviewed for this report, to migrate for employment to the UAE and other destinations. A Pakistani worker employed at Mohammed bin Rashid Al Maktoum Solar Park described migrating to the UAE after his hometown was flooded and the business where he worked was destroyed:

The last place I worked was a pharmaceutical company. I had to leave my job because of rains and floods, due to which interior Sindh basically drowned. Because of that, the company could not manage to sell their products anymore and I had to leave my job.

Bangladesh, which ranks 7<sup>th</sup> on the list of most vulnerable countries to climate devastation according to the Global Climate Risk index, is another example of a climate affected country with a significant representation among migrant workers in the UAE. Bangladesh is accustomed to floods, droughts, cyclones, storms, and riverbank erosion that affect the lives of millions. According to a 2018 report published by the U.S government, 90 million Bangladeshis (56% of the population) live in “high” climate exposure areas,” and 53 million live in areas with “very high” climate exposure. This is in large part due to the country’s low-lying geography, with two-thirds of the country living 4.6 meters (15 feet) below sea level as well as its proximity and connection to the Himalayas which are melting at a more accelerated pace than other mountainous parts of the world, dramatically increasing the amount of water coming into Bangladesh from rivers in Tibet, Nepal, Bhutan and India.

Bangladeshi workers described relocating within Bangladesh and then migrating for employment due to river erosion. A Bangladeshi migrant worker to the United Arab Emirates explained:

My ancestral home was in Dohar but due to river erosion, we had to relocate to Nawabganj in 2011-2012. We had enough land and property there. I would not have come abroad if our community had not been victims of flooding due to river erosion.

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Another Bangladeshi migrant worker to the United Arab Emirates also described migrating for employment after losing ancestral lands to river erosion:

My ancestral home was in Manikganj. My father was financially well off and owned many properties there. In 1994, due to river erosion, we lost everything, and we had to move to Nawabganj. If we had those properties, I could have completed my studies and started up a business in the country rather than being a migrant.

Though Bangladesh is accustomed to heavy rain and flooding, rainy periods have intensified and extended due to climate change. In the summer of 2022, the Sylhet region faced the worst flooding Bangladesh has seen in the last 122 years. This has led to increasing land erosion: 160,000 hectares of land have been engulfed from land erosion from the Padma, Jamuna and Meghna rivers in Bangladesh, driving 300,000 to 400,000 people to migrate to the capital of Dhaka alone each year. These internal migrants moving into big cities often find themselves forced into living in densely populated urban slums and with few economic opportunities a driving factor in seeking employment overseas in the United Arab Emirates and elsewhere.

Climate related migration, moreover, encompasses not only major weather events, but also less recognized climate events. Brining these less reported local climate events into focus, Equidem researchers conducted desk research to identify climate impacts in the local villages and communities of each of the migrant workers interviewed for this study—revealing a striking pattern of migration from areas impacted by drought, floods, heavy rainfall, landslides, mudslides, tropical storms, industrial pollution, and disease outbreaks. (Table 5).

As global leaders convene for COP 28, this report calls for urgent action by the UAE government, global renewable and food delivery sector companies, and global leaders convening for COP 28 to ensure that our global climate agenda includes urgent attention to decent work for the migrant communities most impacted by climate change at home and at work across the globe.

Table 5: Climate Impacts at home driving migration to the UAE among worker respondents

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Country	State	Home village	Climate Impacts	Total workers
Angola	Benguela	Luanda	Drought Flood	1 worker
Bangladesh		Goshai	Flood	1 worker
Aulianagar, Horirampur, Manikganj	Baruakhali, Nawabganj, Dhaka		Flood	1 worker
Nilgram, Dhulshura, Horirampur, Manikganj	Raypur, Joykrishnapur, Nawabganj, Dhaka		Flood	1 worker
Nayabari, Dohar, Dhaka	Baruakhali, Nawabganj, Dhaka		Flood	1 worker
Ranpur	Dhaka		Flood	1 worker
Burundi	Buhiga	Bujumbura	Flood Heavy rainfall	1 worker
Cameroon	Lokono	Bamenda	Drought Landslide	1 worker
Democratic Republic of Congo	Goma	Kinshasa	Flood Landslide	1 worker
Egypt	Cairo	Aswan	Scarcity of water	1 worker
Eritrea	Mendefera_	Asmara	Drought	1 worker
Ghana	Accra	Djamena	Pollution	1 worker
<b>Ghana</b>	Kerala	Neyyattinkara	Flood	1 worker
Rajasthan	Kota		<b>Flood</b> <b>Heavy rainfall</b>	3 workers
Uttar Pradesh	Kushinagar		Flood	2 workers
Kenya	Homabay	Kisumu	Flood	1 worker
Kakamega	Malinya		<b>Flood</b> <b>Mudslide</b>	1 worker
Thindigua	Thindigua		Cholera breakout due to contaminated water	1 worker
Mali	Timbuktu	Bamako	Flood	1 worker

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Mozambique	Maputo	Lichinga	Tropical Storm Cholera outbreak	1 worker
Nepal	Gandaki	Suklagandaki	Flood Landslide	1 worker
Lumbini	Bardaghat Shantinagar		Flood Landslide	1 worker
Sudur Paschim Province	<b>Dhangadhi</b>		Flood	1 worker
Namibia	Kavongo	Windhoek	Flood	1 worker
Nigeria	Ogun state	Lagos	Flood	1 worker
Pakistan	Punjab	Kasur	Flood Hurricane	1 worker
Philippines	Cebu	Manila	Flood	1 worker
Rwanda	Eastern state	Gisenyi	Flood	1 worker
Senegal	Uriro	Dakar	Flood	1 worker
South Africa	Kwasulu Natal	Capetown	Hurricane	3 workers
Sri Lanka	Nuwara Eliya	Colombo	Flood Heavy rainfall Landslide Strong winds	1 worker
Sudan	Khartoum	Atbara	Flood	1 worker
Uganda	Tororo	Jinja	Flood	1 worker
Zimbabwe	Marondera	Harare	Drought	1 worker

#### IV. Risk factors for human and labour rights violations in the UAE

The United Nations Guiding Principles on Business and Human Rights (UNGPs) call for business enterprises to carry out human rights due diligence to identify, prevent, mitigate, and account for how they address their adverse human rights impacts. The UNGPs call upon business enterprises to avoid

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causing or contributing to adverse human rights impacts and address such impacts when they occur; and seek to prevent or mitigate adverse human rights impacts linked to their business relationships. Accordingly, business enterprises must identify and assess any actual or potential adverse human rights impacts with which they may be involved—either through their own activities or because of their business relationships.

The rights violations documented in this report are rooted in laws and employment practices in the UAE and other Gulf Cooperation Council (GCC) states that ensure that employers have access to a hiring pool of migrant workers, while systematically excluding these workers from adequate labour, employment, and social protections. This imbalance between worker and employer power in this ecosystem poses significant risks for unchecked rights abuses, including nationality-based discrimination, wage theft, understaffing and overwork, workplace violence and harassment, health and safety risks, and sudden loss of employment. As outlined in this section, risk factors for labour and human rights abuses in the UAE include widespread employment of migrant workers in temporary positions, where workers are subjected to employer control without adequate labour standards protections, including the freedom of association protections required to enforce labour standards.

#### A. Migrant status as a risk factor for abuse

Risk factors for labour rights violations, exploitation and abuse for migrant workers in the UAE are caused by longstanding migration and employment policies and practices. In the UAE and other GCC states. As oil prices fell in the 1980s, countries cut private sector costs by substituting migrant workers for Arab workers. Across the region, migrant workers were systematically excluded from social protection schemes and labour rights protections, helping create workforces particularly dependent on their employers for their financial stability and ability to work. Legal exclusion and employer dependence, together, expose migrant workers to abuse. According to 2020 population data, expatriates constitute 86.9% of the total population of the UAE.

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## B. Temporary work as a risk factor for abuse

Economic development or “vision” plans in the UAE and other Gulf states have provided a regionally linked framework for various labour market policies and reforms. This regional pathway to economic development depends upon migrant labour because local workforces are insufficient to meet the needs of these plans. To activate National Vision Plans in the UAE and across the region, Gulf governments have advanced policies to establish a ready migrant workforce that can be hired and fired by employers at will, in line with the surges and dips in the market demand for labour. As described in the sections that follow, in this context, GCC nationals are legally set up to wield significant levels of control over migrant wage workers through the kafala system and labour market deregulation. Migrant workers have no pathway to inclusion within the GCC as citizens, and instead hold a contingent status with fewer labour protection and less access to state social protection than those of nationals.

## C. Kafala and fixed-term employment as a risk factor for abuse

Across the GCC countries, migrant workers gain entry and permission to work under kafala programs: an employer-sponsorship model that ties workers to a single employer as a condition of entry, right to work, and legal stay in the country. This practice of tying workers to a single employer violates ILO standards under the Employment Policy Convention, 1964 (No. 122), which calls for freedom of choice of employment irrespective of national and social origin (Article 1). While each of the six GCC states has separate local laws, the overall kafala system functions as a regional paradigm that authorises employers to restrict workers’ job mobility, freedom to enter and exit the country, and negotiating power. Under the kafala system, the sponsor can be a placement agency, company, or individual who issues an employment contract and bears full responsibility for the employee. The sponsor controls the worker’s salary, working conditions, and movement.

As research for this report shows, this imbalanced power dynamic in favour of the employer over the worker undermines the ability of large numbers of workers to exercise labour rights, advocate for recognition of further rights, or address labour exploitation despite initiatives over the last five years to

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loosen employer control in Qatar, Bahrain, and Saudi Arabia. This structural dependence enables an environment where abuse is perpetrated with frequency and impunity.

The UAE has issued a series of labour reforms beginning in 2015, including removing the requirement of obtaining an employer's permission to change jobs (No Objection Certificate) or leave the country (Exit Permit), and increasing access to grievance and labour dispute mechanisms. These recent reforms to the kafala system have somewhat loosened the control that a sponsoring employer can exercise over a worker, addressing a key factor in many cases of worker exploitation and occasionally trafficking in persons cases.

#### D. Inadequate labour standards as a risk factor for abuse

Equidem acknowledges the improvements in formal labour protections in the UAE in recent years, both through the passage of laws and improvements in implementation and enforcement. The effective implementation of major labour reforms in a country with 8.79 million migrants is a challenging endeavour requiring the coordination of multiple stakeholders in government, business, and others.

However, labour protections applicable to migrant workers still fall below international conventions and standards as measured against a wide range of rights benchmarks. Trade union participation remains illegal. Moreover, the evidence gathered for this report indicates that there continue to be significant gaps in the implementation and enforcement of labour reforms. For instance, wage protections are a key device for ensuring workers are justly compensated. However, the UAE does not have any minimum wage protections for migrant workers employed in the private sector.

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## V. Failure to Protect Freedom of Association and Collective Bargaining as a Risk Factor for Abuse

In the UAE, although article 33 of the Constitution guarantees freedom of association within the limits of the law, unions are banned, and all public gatherings require government permission. Accordingly, migrant and other workers in the UAE cannot exercise freedom of association or join trade unions, clear violations of the country's international human rights obligations. As a first step towards remedy, Equidem calls on the UAE government to commit to recognizing the rights to freedom of association, including labour freedom to join or form a trade union irrespective of nationality, identity, or background.

The status of freedom of association and collective bargaining as fundamental principles and rights at work has been well established among ILO member states. Freedom of association is recognized as a fundamental right in every international and regional human rights instrument, from the Universal Declaration of Human Rights and related international covenants to regional human rights charters and governing documents of international organizations. Freedom of association is also guaranteed by most national constitutions.

Freedom of association is fundamental to the development and enforcement of workers' rights. The freedom to associate creates the conditions for worker-led organizations to fight rights violations and promote better standards in their workplaces and beyond. Independent and democratic trade unions provide government's a partner in the enforcement of labour standards and a permanent voice for the improvement of those standards. Our investigations demonstrate that the initiatives taken to provide rights protections to migrant workers in the UAE will remain inadequate until workers are free to exercise their human right to collective representation.

### Collective action in response to wage decrease

Workers employed by a food delivery company recounted the success of their strike during Eid 2022 to protest a cut in their wages.

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A South Asian worker employed by a subcontractor for a food delivery company recounted the worker's strike:

Last year, around EID, there was a strike as a result of a decrease in our wages. The workers then refused to work. We didn't even deliver orders on Eid. Then the [company] representative said they did not even know this wage decrease had happened and they reverted their decision. They sent an email saying "I don't even know how the rate was reduced. You will get the same rate. You continue your work." I think the wage was fine but decreasing it was unfair.

A Pakistani national employed by another contractor for a food delivery company explained that the company had decreased the rates per delivery while the price of petrol was increased. Consistent with the previous account, the worker explained that after workers struck on Eid, the company brought the rates back to their original level:

Around the same time last year, [the company] reduced the rate of commission per order from 10.25 dirhams to 8.75. Petrol had risen up to 5 dirhams per liter so they were spending up to 50 dirhams a day on petrol, 15-18 dirhams on residential costs, and 20 dirhams on food costs. The workers went on strike on Eid, and they agreed to bring them back to the original rate.

#### Retaliation for collective action and reporting rights violations

Workers in the delivery service sector in the UAE reported that there are strict consequences for collective action in response to unfair working conditions: termination and deportation.

A Nepali national employed by a subcontractor for Talabat described the disciplinary action faced by hundreds of Pakistani workers who, in May 2022, called for increased delivery fees to match the rising costs of fuel:

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After the fuel prices increased, some Pakistani nationals protested in the company demanding to raise the per delivery rate. They were instead sent back to their home country. This incident is around 7 months old. There were 300-400 Pakistani nationals protesting and they were all sent home.

## VI. Rising Temperatures and Heat Stress

Climate related impacts have significant consequences for workers employed in the industrial and service sectors, especially in the UAE where the climate is dry with subtropical desert conditions. During the summer, temperature and humidity levels are at their peak and rainfall is scarce. Between April and September, temperatures can reach 55°C (131°F) even in the shade, with humidity exceeding 80 percent.

Exposure to excessive heat levels can lead to chronic kidney injuries and heatstroke with potentially fatal outcomes. Workers in all sectors are affected, but certain occupations are especially at risk because they involve more physical effort and/or take place outdoors. These jobs are typically found in construction, emergency repair work, transport, delivery services, security services and agriculture. In addition to direct health impacts of heat exposure, heavy physical activity during extreme heat can cause distraction (due to discomfort), extreme fatigue and psychological strain. Heavy work in high temperatures can also decrease cognitive and behavioural performance and can increase accident rates by affecting reaction time, attention, and memory. The impacts of heat stress are accentuated for migrant workers from countries with different climate profiles, leaving them less acclimatized to the harsh UAE weather.

The UAE has laws to protect workers from heat stress, including a midday break between the hours of 12:30 pm to 3:00 pm that is implemented from 15 June through 15 September. This law prohibits any

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outdoor work during the hottest hours in the summer with violations punishable by fines or business closures. This policy is limited in scope, however, since temperatures are still extremely high outside of the banned hours. Moreover, as climate change increases the frequency and intensity of heat waves, fixed hour-based restrictions are insufficient to protect workers from heat stress. Limited labour inspection and enforcement, furthermore, undermines the policy's effectiveness.

The United States Occupational Safety and Health Administration (OSHA) recommends that employers should consider any Wet Bulb Globe Temperature (WBGT) reading of over 25°C (77°F) as a trigger for acclimatized workers to stop and take a break from strenuous work. Additionally, recent research also recommends that workers, with no acclimatization and work intensity of 400kcal/h requirements, need to rest 75% of each hour; and when the workload is moderate(300kcal/h), the workers will need to rest 30 min per hour. The failure of the UAE to prohibit any outdoor work, in their highly migrant-dominated sectors, when the WBGT rises beyond 25°C (77°F), results in workers suffering extreme heat exposure, leading to chronic heat conditions.

#### Health impacts due to heat exposure among workers employed in the renewables sector

Many workers in the renewable sector are forced to engage in heavy physical activity under extreme heat. Each type of renewable energy production process (construction/ installation, operation, and maintenance) has its own associated occupational hazards. Even when populations are adapted to local climates, ozone layer loss and corresponding spikes in solar radiation further increase risks associated with heat exposure. Negative health impacts linked to prolonged exposure to hot environments include heat stress leading to dehydration, heat fatigue, heat rash, heat syncope, heat cramps, rhabdomyolysis, heat exhaustion, heat stroke and death. Many of these conditions have been reported to Equidem by workers in UAE's renewable sector.

A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported health impacts associated with prolonged heat exposure:

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Working outside in the park exposes me to heat stroke during summer and I am afraid I will get skin cancer if I do this job for too long since the temperatures can really go up during summer.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard described heat stress associated with her work:

This job causes very serious health issues. Sometimes I am made to stand more than 10 hours in the scorching sun, and this gives me a constant headache all the time. I take pain killers to cool down which isn't good for my health.

A worker from West Africa employed by a subcontractor for Siemens Energy reported health impacts associated with working long days in the heat:

Illnesses include heat rash and heat stroke since half of the time at work I spend working outside under the sun.

A worker from South Asia employed by a subcontractor for a major infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park described the impact of working long hours in the sun:

I am exposed to high temperatures in the park which leads to heat rashes and heat strokes from working under the sun. I often have skin rashes due to excessive sweating.

A Pakistani worker employed at the Sir Bani Yas Wind Farm project also reported heat stress leading to skin rashes and itchiness:

Since I am working under the sun, I am constantly visiting the doctor for consultations. My skin gets rashes and itches a lot.

A Bangladeshi worker employed by a subcontractor as a crane operator at Noor Abu Dhabi Solar Plant reported dehydration due to the heat:

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I only have one tea break and one lunch break during my working hours. We don't have breaks to drink water and I am dehydrated all the time because I am working in a very hot environment.

A worker from West Africa employed as a solar equipment delivery driver reported health consequences from delivering parts in the heat and then returning to an AC truck:

The weather in the UAE is harsh. I make deliveries in the heat but otherwise I am in the car with an AC all the time. It is not good for my respiratory system.

A worker from East Africa employed at Mohammed bin Rashid Al Maktoum Solar Park described the impact of working in the heat:

I work in the heat, so I get heat strokes and heat rashes.

A migrant worker employed in the quality control department at Al Dhafra Solar PV explained that his workload was harder to manage due to the heat in the UAE:

The [workload] was hard for me, but I have learned to manage. In the UAE it is so hot as you know so that is what makes it so difficult to work here.

A worker from East Africa employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described the toll of working in the heat:

It is very tiring standing outside in the heat. I finish in 12 hours without any time off. Standing for long hours in the sun gives me back pain. I am more at risk of many types of sickness due to the harsh weather in UAE.

A worker employed as an electrical technician at Al Dhafra Solar PV described further health impacts:

The humidity causes sore throats and colds and coughs because my job includes going in and out of the air-conditioned building at the solar plant several times a day. I make lots of visits to the hospital to check my health. My body aches in the night after I finish my work.

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## Health impacts due to heat exposure among workers employed in the delivery sector

Delivery workers are particularly vulnerable to extreme heat exposure as they spend long hours exposed to the heat while riding motorbikes. In many cases they lack a company-mandated health insurance policy. Dehydration, heat exhaustion, and even heat stroke, which are often undiagnosed or untreated and can be fatal. An Indian delivery driver employed by a subcontractor for Talabat recounted falling from his bike due to heat stroke while on duty:

I had picked up a delivery from Diera City Centre at around 1 pm and was on my way to Naif. While nearing the area, I felt dizzy. I parked my bike. And while taking out the bottle from the container, I felt awkward and collapsed. It was people around there who carried me to the shade, sprayed water on my face, which woke me and brought me back to consciousness. The medics diagnosed that it was heat stroke.

The vulnerability of delivery workers is heightened by lack of access to shade, water, and restrooms during the deliveries.

Despite these risks, delivery agents do not have the choice to turn down deliveries or decide which deliveries to take and when. Instead, algorithms are used to supervise and measure the worker's movements, including the time taken to accept and deliver an order. These timings impact access to future work. Platforms use customer rating, disciplinary action, incentive pricing and surveillance to push delivery agents to work a certain number of hours, however extreme the temperature. This process severely aggravates the risk of heat stress as workers may be forced to work longer hours and prioritize deliveries over their own well-being. Moreover, the lack of access to fair dispute resolution mechanisms to contest or appeal poor ratings compounds pressure to perform against all odds for migrant delivery workers.

A Bangladeshi delivery service worker employed by a subcontractor for Talabat reported extreme difficulty driving in the summer:

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The weather here is very hot. In the summer we ride at 80 to 100 speeds. This makes us sick sometimes.

A Nepali delivery service worker employed by a subcontractor for a food delivery company reported looking for shade in between work to escape the heat.

The climate is too hot during the summer season. It will reach 50 degrees. I cannot stand it. As soon as I have any free time, I go to restaurants and markets where I can get cold air. Sometimes when I wait, I go under building shade or tree shade.

A Pakistani delivery service worker employed by a subcontractor for a food delivery company described health impacts of moving between extreme heat outdoors and air conditioning indoors up to 40 times a day:

The heat is extreme in the summer. Sometimes the temperatures are as high as 45 degrees. The temperature inside the mall fluctuates between 20 and 24 degrees Celsius. Throughout the day, we experience this temperature shift at least 30 to 40 times, and it makes us sick.

A Nepali delivery service worker employed by a subcontractor for a food delivery company reported difficulties driving in the sun:

It is too hot in the summer season. We have to take care of ourselves. I can adjust while driving but if there is a traffic jam, I feel too hot. My face itches because of dust and hot air. I have also been getting dark circles around my eyes. This is normal. All of us who work in deliveries face the same thing here.

While the impacts of extreme heat are well studied in construction and agriculture work, the vulnerability of delivery workers is less well understood and they are often left out of the category of 'vulnerable' populations. It is important to recognise vulnerability to heat stress among delivery workers and take regulatory action to ensure that pressure to fulfil assignments and secure ratings does not compromise their health and wellbeing.

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## VII. Exploitation in the Renewables Sector

### Race and nationality-based hierarchy and discrimination

Article 1 of the Convention on the Elimination of All Forms of Racial Discrimination (CERD) expressly prohibits state exclusion based on national origin that nullifies or impairs human rights. UAE law also prohibits discrimination and hatred on the basis of caste, race, religion or ethnic origin. In September 2019, the Government amended the labour law to prohibit discrimination which prejudices equal opportunities in employment, equal access to jobs and continuity of employment. Article 4, Equality and Discrimination, of Federal Decree-Law No.33 of 2021, currently in force, holds:

Any discrimination on the basis of race, colour, sex, religion, national or social origin or disability which would have the effect of nullifying or impairing equality of opportunity, or prejudicing equal treatment in the employment, the maintenance of a job and the enjoyment of its benefits, is prohibited. Employers are prohibited to discriminate against workers in jobs involving similar tasks.

Unfortunately, this provision does not specify what types of discrimination are prohibited and does not meet the concerns which have been repeatedly raised by the ILO. In both 2017 and 2021, the ILO Committee of Experts urged the UAE Government to:

... take the necessary steps to ensure that the amendments to Federal Law No. 8 of 1980 on the regulation of labour relations include a specific provision defining and explicitly prohibiting both direct and indirect discrimination on all the grounds set out in Article 1(1)(a) of the Convention covering all workers, including non-nationals, and all aspects of employment and occupation

This gap in legal protection, together with inadequate enforcement of Federal Decree-Law No. 33 of 21, however, continues to leave discrimination unchecked.

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40% of the Asian and African migrant workers employed in the renewables sector interviewed by Equidem for this report described experiencing widespread discrimination on the basis of race and nationality. Forms of employment discrimination reported by workers include discrimination in hiring and termination, lower wages, payment delays, extended working hours, selectively granting leave to workers of particular nationalities, and derogatory comments from supervisors.

A woman worker from Southern Africa employed as a sales representative for Siemens Energy described discrimination in hiring and termination:

Racial discrimination is evident during hiring. White people dominate the office and they get higher salaries than Africans. I have also seen lots of Africans lose their jobs when the business is not doing well.

A worker from East Africa employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described nationality-based discrimination in assigning salaries between workers employed in the same role:

There is a lot of discrimination. Asians and Africans have different salaries for the same job.

A worker from West Africa employed as a solar parts delivery driver reported that African workers receive lower wages and delays in payment than other workers:

There is discrimination here. I only hear Africans complain of low wages and delayed salary payments. Arabs are very okay. They have better working conditions than we do.

A Pakistani worker employed at the Sir Bani Yas Wind Farm reported experiencing wage discrimination, discrimination in allocation of work, and assignment of longer hours based on nationality:

The Asians get less wages than the Arabs which does not make any sense since we are both working the same jobs but getting different salaries. They also discriminate against us in terms

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of work division. We work longer hours. Arab workers come to work later, but if we are late they reduce our salary.

A Bangladeshi worker employed by a subcontractor in construction at Noor Abu Dhabi Solar Plant described nationality-based discrimination in the form of selectively granting leave to workers from certain nationalities:

There is discrimination here. Certain nationalities, like Indians, make up for more of the workforce in the company and they have more influence and closeness to the owner. Sometimes they won't show up for work, but they won't be questioned like those of us from countries considered inferior.

A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park reported nationality-based discrimination in determining promotions:

The division of work is based on racism. Most Africans are assigned more duties compared to Asians and Arabs. Only particular nationalities are promoted. We Africans are always in the junior positions' year in and year out, even when we are more skilled than Arabs. There is also wage discrimination.

A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park also described nationality-based discrimination in promotion and wages:

There is discrimination. I feel I have been in the company for long but there is no promotion or salary increase whereas when they hire other people from Europe, they get a higher salary than I do.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard also reported nationality-based discrimination in assigning promotions:

There is discrimination between African Arabs like Egyptians and the other Africans. They are given priority when there is a promotion within the company.

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A worker from West Africa employed by a subcontractor for Siemens Energy as a security officer reported nationality-based discrimination in assigning working hours:

There is racial discrimination. The North Africans get more time off and less hours than some of us do. They are usually released to go home by the supervisor even before they finish their shift. I am the one who is left to stay and finish my 12 hours.

A worker from South Asia employed by a subcontractor for a major infrastructure company as a driver delivering solar systems described nationality-based discrimination in assigning schedules and working hours:

There is discrimination. I don't see the Europeans and Arabs being overworked the way they overwork Asians. Their schedules are a bit flexible, and they can be changed if they request a change. This is a privilege we don't have.

A worker from East Africa employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park also described nationality-based discrimination in scheduling and receiving leave:

I feel afraid sometimes due to discrimination. My schedule is always very tight and whenever I ask to change it my supervisor declines, saying he knows I am looking for another job. This demotivates me. My supervisor is Indian, and my Asian colleagues get very flexible shifts where they have enough rest. I am always very tired after twelve hours at work and sometimes my body just can't take it.

A worker from Central Africa employed as a solar panel installer at Mohammed bin Rashid Al Maktoum Solar Park described feeling unhappy and insecure as a result of experiencing racial and nationality-based discrimination:

Discrimination is evident. Arab workers are treated differently—unlike Africans who are constantly reminded of the poverty they left at home. This makes us feel unhappy and insecure that we may lose our jobs at any time.

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Lack of opportunities for promotion

Structured opportunities for advancement link promotion to experience and skill upgradation rather than nationality-based preference. Clearly defined, skills-based pathways for advancement facilitate diversity among higher skilled employees, and ultimately increase job satisfaction and worker productivity.

Asian and African workers in the renewables sector in the UAE, however, described barriers to advancement, even after long periods of employment.

A Bangladeshi worker employed by a subcontractor in construction at Noor Abu Dhabi Solar Plant reported that he was promised training that he never received, restricting his prospects for advancement:

They promised training and to promote me from being a construction worker and driver to an engineer, but they have never trained me. My salary is very low considering the work that I do. I felt stagnant when I thought I would have a chance to develop, grow, and improve my salary.

A woman worker from Southern Africa employed as a sales representative for Siemens Energy reported that she did not receive the promotion promised in her contract:

They promise promotions every year in the contract, but I have been in the company for a long time and still have not received any promotions.

An Indian worker employed at an energy company explained how race was a prominent factor in determining promotions:

Discrimination is very evident as promotions are based on colour. New workers join the company and are promoted very fast. We have been in the company for a long time and no promotions are coming through.

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The absence of skill-based pathways for promotion in the renewables sector in the UAE demonstrates the need for further efforts by global renewable sector companies, their subcontractors, and the UAE authorities to extend good practices for expanding equal opportunities.

Exploitative hiring practices

### Recruitment fees

UAE law requires recruitment costs to be borne by the employer:

The employer is prohibited from charging the worker for the fees and costs of recruitment and employment or collecting them from him, whether directly or indirectly.

The UAE Worker Welfare Policy and accompanying Assurance Standards call for employers to perform due diligence measures, including checking whether recruitment fees have been paid or providing employees with written information on their rights at work. UAE legislation, moreover, prohibits recruitment agencies from soliciting or accepting any fees from workers.

Despite these protections, 73% of the African and Asian migrant workers employed in the renewables sector that Equidem interviewed for this study reported paying illegal recruitment fees, ranging from USD 250 to USD 1,300.

A worker from East Africa employed by a subcontractor as a solar installer at Al Dhafra Solar Plant reported paying 600 USD in recruitment fees.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard reported paying USD 400 in recruitment fees.

A worker from East Africa employed as a sales representative for Siemens Energy reported paying USD 400 in recruitment fees.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard reported paying USD 450 in recruitment fees.

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A worker from East Africa employed by a subcontractor for Siemens Energy as a driver reported paying USD 300 in recruitment fees.

A worker from West Africa employed by a subcontractor for Siemens Energy as a security guard reported paying USD 400 in recruitment fees.

A worker from East Africa hired as a sales executive by Siemens Energy reported paying USD 450 in recruitment fees.

A worker from South Asia employed by a subcontractor for a major infrastructure company as a driver delivering solar systems reported paying USD 450 in recruitment fees.

A worker from Central Africa employed by a subcontractor in construction for a major infrastructure company at Mohammed Bin Rashid Al Maktoum Solar Park reported paying USD 300 in recruitment fees.

A worker from South Asia employed by a subcontractor for a major infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 400 in recruitment fees.

A worker from East Africa employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 350 in recruitment fees.

A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 250 in recruitment fees.

A worker from South Asia employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 350 in recruitment fees.

A worker from East Africa employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 500 in recruitment fees.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park reported paying 500 USD in recruitment fees.

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A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported paying USD 350 in recruitment fees.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV reported paying USD 300 in recruitment fees.

### Understaffing and over work

Asian and African migrant workers in the UAE described understaffing in their departments, requiring them to complete physically intensive work for extended hours and days on end without a break.

#### Understaffing

A South Asian migrant worker employed packing solar equipment for a company in Abu Dhabi described overwork:

The company treats all the workers like animals. There is a lot of work here and there is a shortage of workers. I work for twelve hours a day. If I do my work comfortably, the work will not be finished and if the work is not finished, the supervisor will shout at me. Even my salary can be cut. There is so much work that I do not get even a minute's rest. I get time for lunch at 2 pm, but that too for half an hour and then I have to get back to work. I only get leave after seven in the evening.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV described understaffing and overwork:

We are a team of 15 technicians in the Al Dhafra solar plant. I don't think they have hired enough workers for the project because most of the times I am struggling and asking for help because I need a second hand to help me with the installations—the solar panels are heavy. I try my best to complete my allocated tasks in time, but the workload is not manageable.

A worker from East Africa employed by a subcontractor for Siemens Energy as a driver, reported being required to do the work of two people in unloading solar systems:

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We are a group of 10 drivers in the busy city. This is not enough people to manage the amount of work. I always find myself doing the work of two people - from delivering the systems to offloading then without getting help.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard explained that due to understaffing, she was required to work continuously without a day off—sometimes for an entire month:

We are a small group of 10 security guards. There are not enough people hired to work. Sometimes I work without an off day for an entire month.

A worker from West Africa employed by a subcontractor for Siemens Energy as a security officer reported working extended hours and days on end without a break:

We are a small group of ten security guards, and I don't think [the company] has hired enough guards. I am always on overtime hours and sometimes I don't get my day off because there isn't anyone to relieve me. It is not manageable. I do not want to work longer than ten-hour shifts and sometimes I must work on my day off which is very tiring.

A worker from South Asia employed by a subcontractor for a major infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park described inability to complete the assigned work on time due to understaffing in his department:

In my department we are a team of 15 installers. I don't think we are enough. They should add another 15 men because most of the time I am straining to carry and fix the heavy panels alone. I need a second man to assist with lifting the solar panels. It is not manageable alone and I get delayed in finishing on time.

A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park reported that his workload was becoming increasingly unmanageable with the growing demand for solar panels:

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The demand for solar panels is becoming high as electricity prices have gone up. The workload is not manageable. Sometimes I have to call for help from my supervisor and he will send for other technicians, but only when he feels like helping me with my allocated assignments. Otherwise, I must complete the work alone.

A worker from Central Africa employed at Mohammed bin Rashid Al Maktoum Solar Park described being unable to complete daily assignments on time due to understaffing in his department:

There are 15 workers [in my department] and I don't think this is enough. Sometimes the workload increases, and we are not able to complete the daily tasks given by our seniors. The workload is not manageable. We are supposed to be two of us per station, but I usually find myself working alone which becomes difficult to be efficient in completing the panels on time.

A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported that he was made to work unpaid overtime hours when unable to complete work assignments:

Sometimes I cannot manage to finish on time, and I am forced to extend for an extra hour without pay.

An Indian national employed at an energy company described his workload as unmanageable:

The [workload] is not manageable. I constantly need help which I rarely get. I can't complete my work on time.

### Extended hours

Under UAE labour law, normal working hours for the private sector are eight hours a day and workers may not work for more than five consecutive hours without a break of not less than an hour, two overtime hours a day, or more than 144 hours during a single three-week period. Despite these protections, due to understaffing across the renewables sector, Asian and African workers reported

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working more than ten hours a day, six days a week without overtime pay—with some workers reporting that they worked up to 84 hours a week.

A migrant worker employed in the quality control department at Al Dhafra Solar PV reported working 12-13 hours a day, 6 days a week—amounting to between 72 and 80 hours a week.

A Bangladeshi worker employed by a subcontractor in construction at Noor Abu Dhabi Solar Plant reported working 11 hours a day and 60-70 hours a week.

A worker from West Africa employed as a solar parts delivery driver reported working 12 hours a day and 72 hours a week without receiving overtime pay.

A worker from East Africa employed by a subcontractor as a solar installer at Al Dhafra Solar Plant also reported working 10-11 hours a day and around 66 hours a week.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard reported working 72-80 hours a week.

A worker from East Africa employed by a subcontractor for Siemens Energy as a driver reported working 12 hours a day and 72-80 hours a week.

A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park reported working extended hours: "I work 9-10 hours a day and 54-60 hours a week."

A worker from South Asia employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported working 60-70 hours a week.

A worker from East Africa employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported working 12 hours a day and 84 hours a week.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park reported working 11 hours a day and 66 to 70 hours a week.

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A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported working 10 hours a day and 6 days a week for a total of 60 hours per week.

A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported working 11 hours a day.

An Indian worker employed as an IT technician reported working continuously up to 12 hours.

A migrant worker employed as an electrician at Al Dhafra Solar PV reported working 10-11 hours a day and up to 66 hours a week.

#### Wage theft

Denial of wages and employment benefits, whether under written or unwritten employment agreements, has a devastating impact on workers across the global economy. These well documented practices of denying workers owed wages are called “wage theft.” Across the renewables sector in the UAE, our research found rampant wage theft practices.

The ILO Protection of Wages Convention, 1949 (Convention 95) protects all persons to whom wages are paid or payable. Convention 95 calls for all wages to be paid directly to the worker, unless otherwise established under national laws, collective agreements, or agreements between the worker and employer. Wages are to be paid regularly, and a final settlement of all wages due is required upon terminating an employment contract. The UAE has not ratified Convention 95.

UAE law requires employers to subscribe to the Wage Protection System (WPS) and pay wages as per the due date. Federal Law No.33, moreover, does contain some significant reforms including the introduction of a minimum wage—although this is left for further definition by the cabinet—and a requirement that the end-of-service payment must be made even if the employee resigns, or their contract is terminated.

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These protections, however, were diluted significantly by Resolution No. 279 (2020), introduced at the start of the pandemic, permitting companies to reduce migrant workers' wages temporarily or permanently, with the agreement of the employee. This practice is clearly discriminatory as it only applies to migrant workers and allows companies to implement prejudicial wage policies while operating in full compliance with the UAE's labour laws.

Consistent with this government sanctioned disregard for protecting migrant worker wages, African and Asian workers in the renewables sector reported widespread wage theft including non-payment and underpayment of owed wages, irregular and delayed payments, underpayment of contractually promised wages, and wage stagnation.

#### Non-payment and underpayment of overtime

Article 19, Federal Decree-Law No.33 of 2021 regarding the Regulation of Employment Relationship pertains to overtime payments. It stipulates the following:

- "The employer may ask the worker to work overtime, provided the number of extra hours does not exceed two hours in one day.
- If the nature of the work requires the worker to work beyond the normal working hours, then he will be entitled to a pay equal to normal working hours' remuneration (which is based on basic salary) plus 25 per cent of that pay. It could increase to 50 per cent if overtime is done between 10 pm and 4 am. This rule does not apply to workers who work on the basis of shifts.
- If the circumstances require the worker to work on his off day, as specified in the labour contract, or work regulations, then the worker will be entitled to a substitute rest day, or to a pay equal to normal working hours' remuneration (which is based on basic salary) plus 50 per cent of that pay."

Despite these recent advances in legal protection of overtime wages, the African and Asian migrant workers employed in the renewables sector reported non-payment and underpayment of overtime.

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A Bangladeshi worker employed by a subcontractor in construction at Noor Abu Dhabi Solar Plant reported working 11 hours a day and 60-70 hours a week without receiving overtime payments:

They don't pay overtime even though I work extra hours and they promised they would pay me extra.

A worker from East Africa employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park also reported non-payment and underpayment for overtime hours:

They pay overtime sometimes and sometimes they don't pay at all—and it's very less compared to the overtime rate in the UAE.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park also reported working unpaid overtime hours:

I have never received any overtime payments despite working overtime since I joined the company.

A worker from West Africa employed by a subcontractor for Siemens Energy as a security guard reported holding a contract, but losing trust in his employer due to violations of the contract, including failure to pay overtime as promised:

Most of the contract promises have been broken. I no longer have trust in my employer. They promised to pay ten dollars for every hour of overtime but they only pay five dollars an hour. They also promised to adjust our food allowance every year and they have not even though life has become very expensive in the UAE.

A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported non-payment of overtime:

They don't give overtime but sometimes when it's not busy they send me home earlier to cover for the extra hours.

An Indian worker employed by an energy company reported that he is never paid for overtime duty.

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They haven't paid my overtime since I joined the company and I have been doing extra hours.

A migrant worker employed as an electrician at Al Dhafra Solar PV reported that he received overtime, but at half the rate he agreed to:

There is no proper system in place for paying overtime. Whatever hours of overtime I do, only two hours in overtime fees are added to my salary—that's 60 dirhams.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV reported working two hours of overtime daily but without fair compensation:

I work for 11 hours a day—9 hours basic and two hours overtime. They pay overtime but they only pay me half of my contract says I am supposed to make in overtime.

#### Irregular and delayed payments

Under UAE law, wages are to be paid in accordance with Ministerial Resolution No. 598 of 2022 Regarding Wages Protection System:

The employee's wages are due from the first day of the month following the expiry of the period for which the wages are specified in the employment contract. If the period is not specified in the employment contract, the employee must be paid at least once a month. The employer is in default of paying the wage if he does not pay it within the first 15 days after the due date, unless a shorter period has been agreed in the employment contract.

Despite these legal guidelines governing wage payments, African and Asian migrant workers employed in the renewables sector reported irregular and delayed payments.

A Kenyan worker employed by a subcontractor for Siemens Energy as a security guard reported significant delays in receiving her salary:

They delay my salary up to two to three months. When I ask why it's delayed, they will at the most pay half of what they owe. My overtime is delayed together with the salary.

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A worker from East Africa employed at Mohammed bin Rashid Al Maktoum Solar Park also reported receiving payments up to two months late:

Our salary is supposed to be paid by the 27<sup>th</sup> of every month but sometimes they delay up to two months, leaving me with debt all over.

A worker from East Africa employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park also reported delays in receiving his salary, even up to two months:

My salary payment is always delayed up to two months and this is really depressing since I have bills to foot every month.

A worker from East Africa employed by a subcontractor for Siemens Energy as a driver, reported receiving his salary payments up to a month late:

My salary payment is always delayed. I receive my salary on the 10<sup>th</sup> of the month instead of the first and sometimes there is even a full month delay.

A worker from South Asia employed by a subcontractor of a major infrastructure company as a driver delivering solar systems described receiving salary payments two weeks late:

My salary payment is always delayed. In the contract it's mentioned that I will be paid on the 29<sup>th</sup> or 30<sup>th</sup> of every month but they pay me on the 15<sup>th</sup> of the next month instead.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park reported delayed salary payments:

The salary is always delayed. Instead of being paid on the 27<sup>th</sup> of every month they pay us on the 10<sup>th</sup> of the next month.

A worker from West Africa employed as a solar parts delivery driver described challenges related to managing family finances and maintaining food security:

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My salary payment is not paid on the same date. Sometimes they pay me on the 15<sup>th</sup> of the month and sometimes 20<sup>th</sup> of the next month. This is inconvenient for my wife and kids back at home. They are forced to wait for a long time before they can have a decent meal or pay the bills. My food allowance is also delayed together with my salary which makes it difficult for me to afford food. Sometimes I go to bed hungry.

A worker from West Africa employed by a subcontractor for Siemens Energy as a security officer also described the impact of late salary payments on his family and reputation:

My salary is supposed to be paid on the 27<sup>th</sup> of every month as written in the contract but they delay sometimes up to 5<sup>th</sup> of the next month. This makes my bill payments late for everything and makes me look bad to my family also since they depend on me.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park reported delayed salary payments:

The salary is always delayed. Instead of being paid on the 27<sup>th</sup> of every month they pay us on the 10<sup>th</sup> of the next month.

A migrant worker employed in the quality control department at Al Dhafra Solar PV reported delays in receiving his salary:

I have not been paid for the last two months of work.

### Wage Stagnation

Despite rising costs of living across the UAE and globally, African and Asian migrant workers employed in the renewables sector in the UAE reported stagnant wages—with some receiving the same wages in 2023 as they did in 2018. A worker from Southern Africa employed at Mohammed bin Rashid Al Maktoum Solar Park reported that his salary had not been raised in five years:

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They pay the salary on time, but it's been the same for the last five years I have worked with them. There has been no increment or anything like a bonus or extra even if we reach the target as a team.

A South Asian worker employed by a subcontractor of a major infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park reported being promised a raise in 2020 that has yet to be implemented:

They promised me a salary raise which they haven't implement for three years now, since I started working with them.

A South African woman worker employed for Siemens Energy Products reported that she did not receive the pay increase she was promised:

Siemens promised a pay increase every economic year but since 2018 they haven't increased the wages and life has really gone up in the UAE.

An East African worker employed by a subcontractor of Siemens Energy as a security guard reported that he had been promised a wage increase each year but has not been given a raise since 2017:

They promised a pay raise every financial year which I never saw over the years I worked there from 2017.

An East African worker employed as a sales representative for Siemens Energy also reported that she did not receive the salary raise she was promised:

They promised an increment every financial year but they haven't increased it yet, so I am still waiting.

A South Asian worker employed in construction at Mohammed bin Rashid Al Maktoum Solar Park also reported that his wages had not been increased as promised:

The salary is very low. They promised an increase in every financial year, but this is something I haven't seen since I started working for them.

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A Bangladeshi worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park confirmed stagnant wages:

They pay our salaries on the 30<sup>th</sup> of every month and they promised to increase our salaries, but we are still waiting since I joined the company.

An Indian national employed at an energy company reported that his allowance was not increased as promised.

They promised an increase in the allowance after every financial year which has not happened ever since. I have worked there for 4 years now.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV reported that he was promised an annual raise that has yet to be implemented:

They promised a 6% increase in my salary every financial year which hasn't been implemented.

#### Workplace violence

Article 14, Federal Decree-Law No.33 of 2021 regarding the Regulation of Employment Relationship prohibits sexual harassment, bullying, and verbal, physical, and psychological violence:

Sexual harassment, bullying or any verbal, physical or psychological violence committed against the worker by the employer, his superiors at work, colleagues or the persons who work with him, are prohibited.

Despite these protections, however, workers reported workplace violence—including one case of sexual violence and rampant verbal abuse.

#### Sexual harassment at work

An East African worker employed by a subcontractor for Siemens Energy as a security guard described sexual harassment at work:

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My supervisor is always approaching ladies sexually and if I refuse his advances, he might not give me my weekly off which I feel is unfair.

### Physical violence

A South Asian migrant worker employed packing solar equipment for a company in Abu Dhabi reported physical violence, especially targeting new workers:

If a worker does not listen to the officer or is found resting during work, the officer gets angry and sometimes he slaps in anger. Once a worker who worked with me burnt his hand and was sitting and resting. Then the supervisor came and slapped him without asking anything and was shouting abuses at him. This mostly happens with new workers.

### Verbal abuse

Asian and African migrant workers employed in the renewables sector described verbal abuse taking the form of regular and relentless yelling, abuses in Arabic, racism, and public humiliation:

An Indian national employed at an energy company reported being called racist names at work:

My supervisor is a racist he calls us names which really demean us. One time he called my workmate a stupid monkey simply because he found him using a phone during work hours. He didn't even ask what his reason was for using his phone. My colleague was checking on the new energy technology in the market.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV described racism from his supervisor:

My supervisor is rude when he speaks. He keeps on telling us that we are losers and that's why we are working in his country and not ours. One time I fixed the solar panel wrong and instead of correcting me, he yelled and made me feel demotivated to even complete the day.

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A South Asian worker employed by a subcontractor as a crane operator at Noor Abu Dhabi Solar Plant described being yelled at by his supervisor and fearing that he would be slapped:

My supervisor is rude and mean to us. One time, I dropped the sand in the wrong place, and he yelled at me the whole day. I thought he would slap me, but he didn't.

A West African worker employed as a solar parts delivery driver reported being spoken to rudely and yelled at for arriving late due to challenges at his employer-provided accommodation:

I get yelled at and spoken to rudely often. One time I got to work late because there was a long queue of my roommates who were ahead of me before I could take a shower. I was one hour late, and my supervisor was very upset at me and didn't even want to know the reason why I came late. Instead, he just went ahead and yelled the whole morning. It is very common for [my supervisor] to yell and be rude, especially if a mistake happens.

A South Asian worker employed at the Sir Bani Yas Wind Farm project as a turbine and windmill transporter reported being yelled at and abused in Arabic:

The treatment here is not good at all. They abuse me and yell at me and my fellow workers in Arabic which is very discouraging.

An East African worker employed by a subcontractor for Siemens Energy as a security guard reported that it was very common to be yelled at and spoken to rudely by supervisors:

Getting yelled at and spoken to rudely is very common. My supervisor even goes to the point of saying we are the poorest people in the world. He says it jokingly, but he wants to drive a negative point home. Facing people every day who don't appreciate the work I do and see me as uneducated really breaks my heart.

Another East African worker employed by a subcontractor for Siemens Energy as a security guard described verbal abuse at work:

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My supervisor yells all the time, even if there is no need to. I think he has racism issues too. Most of the time, he yells for simple things—like not greeting him in the morning. He will yell at the top of his voice.

A West African worker employed by a subcontractor for Siemens Energy as a security officer described being yelled at by his supervisor:

I do get yelled and screamed at by my supervisor at work sometimes, like when a customer walks into the building without being checked if I am busy with another customer. Also, when I try to check a customer and they don't want to be checked he screams at me..

A South Asian worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park described being publicly humiliated and told he was stupid for asking how to install new pipes:

It is very common for my supervisor to speak to me rudely. He yelled at me in front of everyone when I asked him a question on how to install the new pipes. He said I am stupid and asking him stupid questions during busy times.

A South Asian worker employed by a subcontractor for a major infrastructure company as a driver delivering solar systems described being publicly humiliated for making a mistake:

One day, I forgot some solar systems in the office, and I had to come back for them. My supervisor was waiting for me and was yelling all over the place telling everyone that I was useless, and I couldn't take simple instructions. Sometimes I feel bad and feel like walking out, but I hold myself and push for the sake of my family.

A worker from Central Africa employed by a subcontractor for a major infrastructure company in construction at Mohammed Bin Rashid Al Maktoum Solar Park described being cursed at in Arabic:

The supervisors are often abusive, and yelling is something they have really perfected. They speak rudely and even curse during working hours. My supervisor curses in Arabic and is very loud when giving instructions.

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An East African worker employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described getting yelled at and being spoken to rudely as common:

Getting yelled at and spoken to rudely at work is very common. [My supervisor] is very arrogant and rude when addressing me. He is always shouting and doesn't have respect for ladies. He shouts at everyone below him. One time a construction worker took some items out of the solar park, and he made a very big issue out of it. He almost got me fired from my job even after explaining to him that I was busy doing something else and I was alone.

A worker from Southern Africa employed as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park described verbal abuse:

A lot of the time I get spoken to rudely. My supervisor is arrogant and says he has been in the company for a longer time than us. In one instance, a customer complained that I didn't fix the solar panel in time, and he was in a hurry to leave his apartment. I tried to explain to my supervisor that I needed to finish the work properly but still he yelled at me all over the office.

A South Asian worker employed by a subcontractor in construction at the Mohammed bin Rashid Al Maktoum Solar Park described being screamed at and accused of working slowly:

[My supervisor] is always yelling. At first, I was afraid of him, but nowadays I just hear and continue with what I was doing. He screams at me saying I am slow and that he needs me to increase my speed.

An East African worker employed by a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported tolerating abuse from his supervisor based upon his migrant status:

[My supervisor] talks very rudely to me – to the point that one feels like slapping him, but I keep reminding myself I am in a foreign land. One day I got very late because of a technical problem in the metro. I tried to explain but I just got abuses from him instead of him being empathetic towards me.

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A Central African worker employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park described facing rude behaviour from his supervisor daily:

[He] has been my supervisor for a long time. I can't remember a day at work when he was polite. He can't control his loud voice and he is always shouting and yelling when he wants to say something. One time I asked him for something nicely, but he shouted at me and told me I can't be asking. I felt very offended because he got the attention of all of the workers on the site.

A migrant worker employed as a supervisor in the quality control department at Al Dhafra Solar PV described verbal abuse on site:

I have not faced verbal abuse because I am a supervisor, but I have seen other workers treated poorly. Many supervisors yell at them and cut their salaries if they don't complete tasks.

#### Health and safety risks

Under UAE labour law, an employer is obliged to provide a safe and appropriate work environment to employees. Employer obligations are as follows:

- provide the necessary means of protecting workers from the hazards of occupational injuries and diseases that may occur during work
- place instructional boards with awareness materials
- provide appropriate training to workers to avoid such risks
- conduct periodic evaluations to ensure that all parties to the employment contract comply with and meet the requirements of occupational health and safety.

Establishments with 50 or more workers must have a special system for monitoring work injuries and occupational diseases. The system should include a mechanism to:

- carry out health examination of workers engaged in hazardous activities
- report incidents of work injuries and occupational diseases within the firms

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- investigate incidents of work injuries, occupational diseases and necessary measures to protect other workers
- obtain a report from the competent medical committees that shows the level of disability in the event of a work injury or occupational diseases

Additionally, the employer should:

- provide the worker with proof of his employment in the firm performing such a hazardous job
- inform the medical authorities as soon as becoming aware of the occurrence of a work injury or suspecting an occupational disease
- report immediately to the competent police station, in the geographic location of the firm, any work injury or occupational disease.

Migrant workers in the renewables sector interviewed by Equidem, however, reported exposure to occupational health and safety risks without getting the benefits of these legally mandated protections. A migrant worker employed as an electrician at Al Dhafra Solar PV described the risks associated with his daily work:

The solar panel installation area is an area where there are chances to have accidents, so we must follow safety guidelines very strictly. We run the risk of getting an electric shock if we touch dangerous power areas. In the morning, no one works on the lines with our hands. On the night shift, we switch off the power supply generator, spread out the wires and we work hard.

A South Asian migrant worker employed packing solar equipment and making eco-friendly ply sheets for a company in Abu Dhabi reported risks of being burned while making eco-friendly ply:

The risk is high while working on a ply sheet, and it harms the body. Mostly there is a possibility of getting burnt, and new workers get hurt most often because they are not given training before work. I was burnt by fire many times and had blisters on my hands. During that time, I was not even given money for treatment, and I was not even given leave to rest. I complained

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about this to the company official but instead of solving my problem the official started shouting at me and said that I got hurt due to my carelessness. After that, no other worker can complain because we are afraid.

### Mental health impacts

An East African worker employed as a security guard at Mohammed bin Rashid Al Maktoum Solar Park described the impact of long working hours on her mental and emotional health:

I am not okay mentally and emotionally. I work many hours without rest, and I don't have time to live a normal life. I don't get to socialize as I am almost always working.

A Southern African worker employed as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park described being unable to find the time to speak to loved ones due to long working hours:

My mental health is at risk since it's a demanding job and I don't have enough time to even chat with my loved ones.

A South Asian worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park also described feeling socially isolated:

Socially, I don't have a life as I am always working and when I am not working, I am sleeping. There is no time to meet with my friends due to my busy schedule.

An Indian national employed at an energy company reported stress associated with his work environment

Socially, I am not okay. The working environment seems to get worse every day.

### Denial of paid sick leave

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UAE labour law protects the rights of workers to paid sick leave following probationary periods. A worker may be entitled to a sick leave of not more than 90 continuous or intermittent days per year, where the first 45 days qualify for paid sick leave. During the first (15) fifteen days a worker is entitled to full pay; during the following thirty days they are entitled to half pay; and the final forty-five days can be unpaid.

Despite these protections, African and Asian migrant workers reported inability to access paid sick leave. A West African worker employed as a solar parts delivery driver reported inability to access sick leave except for in cases of accidents:

Sick leave is given only when there has been an accident. In other cases, they tell me to report to work first and see how I feel as the day goes by.

A migrant worker employed as an electrician at Al Dhafra Solar PV also reported that sick leave was only given by the company in accident cases:

Sick leave is only given when one gets in an accident, but normal illnesses aren't taken seriously.

A Central African worker employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park also reported denial of paid sick leave, except in instances of workplace injuries:

Sick leave is only given when one gets in an accident while working. For the rest of our illnesses, they don't give sick leave and they mark us absent.

An East African worker employed by a subcontractor of Siemens Energy as a security guard described denial of paid sick leave:

Sick leave is not given and if it is given one will not receive the pay for that day.

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A South Asian worker employed by a subcontractor for a major infrastructure company as a driver delivering solar systems reported that they did not receive paid sick leave:

Sick leave is perceived as an absence. No one is paid if they fall ill and don't come to work.

An East African worker employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported that workers were denied paid sick leave:

Sick leave is given when one is very ill, but it is unpaid. They consider one absent from work.

A Southern African worker employed as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park reported company failure to provide paid sick leave:

Sick leave is given but without pay in most cases. So, when we fall sick, we prefer to come to work and try to push ourselves to at least get that day's salary.

An East African worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported company failure to provide paid sick leave:

Sick leave is given unpaid. If one takes sick leave the pay for that day is considered lost.

A migrant worker employed as a quality control inspector at Al Dhafra Solar PV reported that his salary was cut if he did not attend work due to being sick:

They cut our salaries if we are sick.

#### Good practice- procedures for granting sick leave

A South Asian worker employed by a subcontractor in construction at Mohammed bin Rashid Al Maktoum Solar Park reported company practices that include granting workers paid sick leave:

Sick leave is given when one is injured at work and visits a known hospital. Then they need to bring a copy when they come back to work after their sick leave. [The company] pays for the treatment and consultations. We pay for the transport and for the sick certificate.

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## Inhuman living conditions

African and Asian migrant workers employed in the renewable sector described completing long days at work and returning to overcrowded accommodations. They also described inability to afford nutritious food.

### Overcrowded and unhygienic accommodations

Ministerial Resolution No.44 of 2022 Regarding Occupational Health and Safety and Labour Accommodation mentions that establishments with 50 or more workers, where each worker earns less than AED 1,500 per month, must provide accommodation for its workers.

The Ministry of Human Resources and Emiratization also provides detailed guidelines on permissible accommodations:

“Accommodations must be well-lit, air-conditioned and well-ventilated. Each person should be allocated at least 3 square metres of space.

1. Maximum number allowed for one-bedroom ranges from 8 to 10 persons, while maintaining the commitment to the area allocated to each person.
2. Bedroom ceiling height should not be less than 7 feet.
3. A bed space should be available for each worker, even during working hours.
4. Each worker must be provided with a bed, side table and a lockable cupboard of 2 m height.
5. Distance between each bed should not be less than 36 inches from all sides. The height of the bed must not be less than 12 inches. In case of bunk beds, the distance between each bed from all sides should not be less than 48 inches from all sides, provided that the distance between the upper and lower beds is not less than 27 inches. Three-bunk beds are not allowed.
6. In case of shared bathrooms, one toilet must be allocated for each 8 persons. Number of toilets should not be less than 2 in each shared bathroom.

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7. One urinal must be allocated for each 25 persons. Urinals must have sufficient quantity of water required for flushing and cleaning purposes.
8. There must be one place for bathing and one washbowl for each 8 persons.”

In stark violation of legally prescribed living conditions, African and Asian migrant workers described living in rooms with up to 19 other migrant workers, sometimes with no space except to sleep. Workers described their accommodation as unsanitary and inadequately ventilated. They reported inadequate access to toilets and showers.

A migrant worker employed as an electrician at Al Dhafra Solar PV described the camp where he lives:

The accommodation is not good. I share with about ten people There are sixteen rooms like this in the building where my co-workers live. 8000 workers live in the same camp.

An East African worker employed by a subcontractor for Siemens Energy as a driver reported sharing with nearly four times the number of workers specified in his contract:

My accommodation is shared among 19 people, and this is extremely congested. My contract says I will be sharing with only 5 workers.

A South Asian worker employed by a subcontractor in construction at Noor Abu Dhabi Solar Plant described overcrowded accommodations:

Our accommodation is pathetic with 19 people in a single room. The hygiene standards are really bad.

A West African worker employed as a solar parts delivery driver reported overcrowded and unsanitary accommodations:

I am sharing with 18 people – we live in a small room and the sanitation is not good. It is overcrowded. I have to wait for my roommates to shower so I must wake up very early to get ready for work. There is not enough ventilation, and it is hard to breathe.

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A Southern African worker employed as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park described health risks associated with overcrowding:

My accommodation is not up to standard. I am forced to sleep with eight people in a single room with decker beds. This exposes me to airborne diseases. I also share toilets with ten people, so if someone is sick, they can easily transmit their illness to me.

A South Asian worker employed by a subcontractor for a major infrastructure company as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park explained that besides resting and sleeping, there is no room in his shared accommodation for anything else:

Accommodation is provided in a small apartment shared with 15 men in a single room. We are limited to resting and sleeping. There is no space to do anything else.

An East African worker employed by a subcontractor for Siemens Energy as a security guard reported living in a room with nearly three times the number of workers intended for the space:

Our accommodation is a shared accommodation with 16 ladies inside a very small room which is supposed to accommodate only 6 people.

A West African worker employed by a subcontractor for Siemens Energy as a security guard reported crowded accommodations and inadequate access to toilets:

Accommodation is shared. I live in a small room meant for 6 people and I am sharing the room with 14 workers. It's a big challenge. Sometimes I have to wait for the toilet or the bathroom when I need to leave for work.

A South African woman worker employed as a sales representative for Siemens Energy Products reported sharing her accommodation with more than twice the amount of people stated in her contract:

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My accommodation is shared with seven other ladies in a single flat, and in the contract, it is written that I will share with three colleagues.

An East African worker employed by a subcontractor for Siemens Energy as a security guard described sharing with more than double the number of colleagues specified in his contract:

I share with five colleagues instead of two which is mentioned in the contract.

A West African worker employed by a subcontractor for Siemens Energy as a security officer reported sharing with nine other workers:

Our accommodation is unbelievably full. I must share with nine people in one small room.

A South Asian worker employed by a subcontractor for a major infrastructure company as a driver delivering solar systems reported sharing with sixteen other workers:

My accommodation is shared between sixteen workers, which is double the number there is supposed to be. We have bunk beds which makes it very difficult to even keep my things together.

A woman worker employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described sharing with almost double the number of women specified in her contract:

According to my contract, I am supposed to share with five ladies, but I have ended up sharing a small room with nine other women.

A South Asian worker employed in construction by a subcontractor at the Mohammed bin Rashid Al Maktoum Solar Park also described overcrowded accommodations:

Our accommodation is congested with 20 people in a squeezed room and bunk beds. This is something I have never seen in my life. Even in my country it's never shared like this.

An East African worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described overcrowded accommodations:

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Our accommodation is fully occupied with 15-20 workers inside a small room meant for only five people.

A worker from Central Africa employed as a solar panel installer at Mohammed bin Rashid Al Maktoum Solar Park also described sharing a room between 20 people:

Our accommodation is a shared room with many people living inside. The room which is meant for nine people is shared by up to twenty workers.

A South Asian worker employed in construction at Mohammed bin Rashid Al Maktoum Solar Park through a subcontractor described overcrowded accommodations:

Our accommodation is a small room with twenty workers that is meant for eight people, I sleep on the double decker bed, and we share three units of toilets outside of our rooms.

An Indian national employed as an IT technician by an energy company described his accommodation as not only small and overcrowded, but also unhygienic:

The rooms are small. No keys for lockers. Light is low in the room. The restrooms are untidy. The mess looks unhygienic. Mattresses are old.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV described overcrowded accommodations:

The accommodation is crowded. I share a small room with nine fellow workers and the facilities are limited. The room is only meant for six people and the toilets and bathrooms are only three units each. This makes it inconvenient to make it to work on time when I don't wake up early enough.

### Inadequate food and food allowance

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African and Asian migrant workers employed in the renewables sector described inadequate access to nutritional food due to low food allowances. All 102 workers Equidem spoke to across three sectors and 54 companies, including sub-contractors, reported that they did not have cooking facilities in their accommodations and therefore had to either buy prepared food or eat in the company canteen. Some workers described food in company canteens as unpalatable. To manage, workers reported skipping meals and buying food on credit. A West African worker employed as a security officer through a subcontractor at a Siemens store reported an inadequate food allowance:

Our food allowance is very low compared to the food costs in the market and it cannot take me through the whole month. I have to skip some meals. To make it worse, we are not allowed to cook or bring food from outside, making it even more difficult to store food.

An East African worker employed as a driver for Siemens Energy LLC, through a subcontractor, reported that his food salary is so low that he skips meals:

The food allowance is not enough. I can't afford decent meals. I have to eat and manage on very basic food. Sometimes I end up skipping meals due to the high cost of living in the UAE.

A South Asian worker employed through a subcontractor as a solar panel installer for a major infrastructure company at the Mohammed bin Rashid Al Maktoum Solar Park also described his food allowance as insufficient to cover the cost of meals:

The food allowance is not enough to take me through the whole month. This makes me skip some meals in order to afford the next meals. I can't afford good food because my allowance won't allow me to. Food prices in Dubai have really gone up and my company hasn't made any adjustments on the food allowance.

Another South Asian worker employed in construction at Mohammed bin Rashid Al Maktoum Solar Park through a subcontractor described his food allowance as inadequate:

The food allowance they give us together with the salary is not enough to push me through the month as food prices have gone up and the company hasn't added to the food allowances. I

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can't afford to buy healthy food. I can only afford to buy cheap and low-quality food with my allowance.

An East African worker employed as a security guard by a subcontractor at Siemens Energy reported going into debt by buying food on credit since her food allowance is inadequate:

Our food allowance is very small compared to what I spend on food. I am forced to take food outside on credit.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV also reported that his food allowance was insufficient to meet monthly food expenses:

A food allowance is given with my salary but it's not enough to carry me through the month. Due to the increase in food prices in the UAE, I can't afford to buy healthy food with my allowance. I am forced to eat low quality foods.

Another East African worker employed through a contractor as a security guard in a Siemens Energy Shop reported that her food allowance only allowed her to afford food from the company canteen:

My wages don't allow me to get regular and good food. I can't cook my own food. I have to buy from the company mess as this is what I can afford.

A South Asian worker employed as a crane operator by a subcontractor at Noor Abu Dhabi Solar Plant described substandard food:

They prepare very disgusting food, but we have to buy it because it is all that we can afford. The food here gives me diarrhoea and stomach pain.

An East African worker employed as a security guard at Siemens Energy through a contractor described difficulties maintaining a balanced diet:

The food allowance is very little and I cannot cook where I live. That means I have to keep buying food which is expensive and makes it difficult to maintain a balanced diet.

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Another East African worker employed as a security guard by a subcontractor at Siemens Energy described being unable to afford healthy food:

I cannot afford healthy food. I am forced to buy food outside since I am not allowed to bring food inside my accommodation. This makes my food expenses even higher.

A worker from Central Africa employed by a subcontractor in construction for a major infrastructure company at Mohammed bin Rashid Al Maktoum Solar Park described his food allowance as inadequate to support the cost of meals:

I can't afford sustaining food as my food allowance runs out before the end of the month. The cost of meals is expensive in Dubai and buying three meals a day makes it very expensive for me to cope during the month.

A West African worker employed by a subcontractor as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park also described his food allowance as insufficient to meet his needs:

The food allowance is very little compared to food needs. Sometimes I have to skip meals to avoid overspending on my meals. I can't afford healthy food due to the rising costs of living in Dubai. My food allowance has never been increased.

A migrant worker employed as an electrician at Al Dhafra Solar PV reported that the food provided by the company was not of good quality:

The food provided by the company is not good quality. I am not given any extra food allowance and my salary is not enough to afford healthy food.

A migrant worker employed in the quality control department at Al Dhafra Solar PV reported a decrease in his energy levels related to the quality of food he can afford:

I feel weak because I can only have simple food.

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### Late payment of food allowance

African and Asian migrant workers not only reported that their food allowances were insufficient to cover their medical needs but also reported receiving their food allowances late. A worker employed as a security officer by a subcontractor at Mohammed bin Rashid Al Maktoum Solar Park reported that due to delays in receiving his food allowance he had gone into debt:

Our food allowance is paid together with our salaries, but it is way too little compared to the food prices in Dubai. I cannot afford healthy food and on top of that my food allowance is late and I am forced into debt for food.

A South Asian worker employed in construction by a subcontractor at the Mohammed bin Rashid Al Maktoum Solar Park described his food allowance as inadequate:

My food allowance is very low compared to the food cost in the UAE which makes it very difficult for me to enjoy decent meals even after working so hard. When I break for lunch, sometimes I just want to rest and not eat because I can't afford the meal and I only take water. Sometimes I am embarrassed to watch others eat when I don't have food for my breaks.

An East African worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park described skipping meals in response to delays in receiving his food payment which he described as below market rates:

Our food allowance is very low compared to the market food allowances in many companies and this is also delayed sometimes with the salaries. I start guarding the gate from 6.15 am to midday. When I break for lunch sometimes I skip eating because I don't have enough money to afford a decent meal. Then I get back to work from 1pm to 6pm. I can't afford healthy food due to the delay in pay and the high costs of living in the UAE.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park reported that their food allowance is inadequate to support their nutritional needs:

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Our food allowance comes in late with the salary. It is very low compared to the rate of the cost of living in the Emirates which has really gone up. They have been giving us the same food allowance for a long time and this makes it difficult to get good food with the rising costs of living.

A South Asian worker employed as a driver through a subcontractor delivering solar systems for a major infrastructure company described his food allowance as not only inadequate to cover the cost of meals but also delayed:

My food allowance is delayed together with my salary. I skip meals due to the high cost of meals.

#### Barriers to seeking relief

Migrant workers in the renewable sector reported barriers to seeking relief in cases of rights violations. These include holding worker identity documents, inadequate grievance mechanisms within companies, retaliation for reporting rights violation, and threats of termination.

#### Holding identity documents

UAE law prohibits employers from confiscating employee passports. According to the ILO Special Action programme to Combat Forced Labour, retention by an employer of worker identity documents is an indicator of forced labour because in many cases without identity documents, a worker will not be able to obtain other jobs.

Despite laws preventing employers from holding worker passports, African and Asian workers employed in the renewables sector in the UAE reported that employers hold their passports, preventing them from leaving their jobs and seeking new employment opportunities. This inability to seek alternate employment provides workers with a disincentive for reporting rights violations.

A South Asian worker employed as a crane operator by a subcontractor at Noor Abu Dhabi Solar Plant reported that the company held his passport to ensure he could not leave the job:

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They are holding my passport as security. That way, if I wanted to run away from this work they could prevent me from doing so.

A migrant worker employed as an electrician at Al Dhafra Solar PV reported that his passport was held by his employer, restricting his ability to leave the country:

My passport is with them. [The company] is holding our passports. They give it back to us once in two years. If we have any emergency in between, we can go, but they cut the salary of the days we go for emergencies. They also cut the extra costs such as visa, food, accommodation, and transportation.

Another South Asian worker employed in construction by a subcontractor at the Mohammed bin Rashid Al Maktoum Solar Park reported that his passport was held by the company:

They hold my passport in case I decide to leave the company without notice.

An East African worker employed as a security guard at Siemens Energy through a contractor reported that the employer was holding his passport:

They are holding my passport. They say it is not safe to keep it with me due to security reasons.

Another East African worker employed as a driver for Siemens Energy, through a subcontractor, also reported that the company was holding his identity documents:

They are holding my identity documents for security purposes. Where I live, it is not safe to keep my ID with me.

#### Retaliation for reporting rights violation

An Indian national employed as an IT technician for an energy company described the consequences workers face for reporting rights violations:

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Workers have been terminated in the past for reporting labour violations. There are many cases that are still pending in labour courts related to this type of situation.

A South Asian migrant worker employed packing solar equipment for a company in Abu Dhabi described being unable to report rights violations at work:

There are many problems here, but I cannot report them because the worker does not have the right to complain. Even if I go to complain, I will not be heard. Whatever the officers here say will be accepted. Here, action is taken against the person who complains, or he is fired.

#### Inability to seek relief through employer mechanisms

The African and Asian migrant workers we spoke to in the renewable sector reported a range of challenges in seeking relief for rights violations and other workplace issues within their companies. Workers described a lack of clear pathways to report rights violations, lack of faith in the fairness and efficiency of these processes, and fear of approaching seniors. Workers who did make complaints reported that they did not get relief through company channels.

Workers in the renewables sector reported that they were not aware of company channels for reporting rights violations and other workplace issues. An East African worker employed as a driver for Siemens Energy LLC, by a subcontractor, also reported that there are no clear grievance procedures:

There are no clear protocols on how to report issues. Even if one reports to the managers, the issues are not addressed properly so I don't find a need to report the issues I face.

A migrant worker employed as an electrician at Al Dhafra Solar PV also reported that he did not know of any places to report rights violations on site:

There are no places to report that I know of.

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Another South Asian worker employed as a crane operator by a subcontractor at Noor Abu Dhabi Solar Plant reported that he did not know where he could report rights violations:

There are no procedures in place here to report our problems. I only know my fellow workers and my supervisor. I don't know where I can report any violations.

A West African worker employed as a solar parts delivery driver reported that there are no clear company procedures to report violations at work:

There are no clear procedures in place to report mistreatment at work. The only procedure I am aware of is the government labour offices. This is a waste of time. It is a small office, and they will always take the side of the employer.

A West African worker employed as a security officer through a subcontractor at a Siemens store explained:

There are no procedures to report abuses since we are working for a sub-contractor. They didn't give me guidelines on reporting abuses, and I have never seen anyone do it, so I don't trust that there is any procedure. I did make a complaint about the number of hours I work but I am yet to get feedback on this issue.

Where procedures for reporting rights violations exist, workers explained that they did not have faith in either the fairness or efficiency of these processes.

A South Asian worker employed in construction by a subcontractor at the Mohammed bin Rashid Al Maktoum Solar Park reported that grievance mechanisms are ineffective:

There are no clear procedures to report rights violations at work. Grievance mechanisms exist, but they are not effective.

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A worker employed in construction at Mohammed Bin Rashid Al Maktoum Solar Park explained that relationships between top management and company seniors undermined opportunities for relief:

Consequences depend on the people involved. Most of these seniors are related to the top management and this makes it difficult for them to be given any form of discipline even if they are abusive.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park also reported feeling that company leadership would listen to supervisors and be unlikely to take workers' complaints seriously:

There are procedures, yes, but at the end of the day the person who makes the complaint is always on the losing end because the leaders on top listen to the supervisors more than the junior employees. I made a complaint about the warning letter issued to me, but no one was willing to assist me with my case, so I just let it go.

An East African worker employed as a security officer at Mohammed bin Rashid Al Maktoum Solar Park explained that she did not have faith in the channels for reporting rights violations:

I can report violations, but before action will be taken by higher level management I will have given up on the case. They take a very long time to investigate, and I don't have faith that these investigations will work.

Workers also reported being fearful of their supervisors and therefore being unwilling to make complaints.

A West African worker employed by a subcontractor as a solar panel technician at Mohammed bin Rashid Al Maktoum Solar Park described ineffective grievance mechanisms:

There are no clear procedures to report violations at work. I haven't made a complaint because the environment doesn't allow me to. Most seniors in my department aren't approachable and it scares me a lot even to approach them.

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Another West African worker employed as a solar parts delivery driver reported being afraid that if he complained, he would lose his job: I have never made a complaint as I fear being victimized and losing my job.

Workers who did engage with company mechanisms report that they did not get the relief they required. An East African worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park reported failure to get relief through company grievance channels:

I made a complaint about my salary delay to the management. They only acted once. The rest of the time they never did. Most of the time there is no response.

An Indian national employed at an energy company described reporting unfair treatment to the human resources manager but being provided with no solution:

There are procedures, but I don't have faith in them as they don't really listen to us unless it's a really pressing issue. I once spoke to the human resources manager about the way they treated us, but there was no proper solution provided. She said she will investigate, and it's been a while since she promised to look into it.

A migrant worker employed as an electrical technician at Al Dhafra Solar PV lodged a complaint about only receiving half the overtime pay he was promised in his contract, but at the time of interview, he had yet to see any results:

I made a complaint about overtime to higher management, and they said they will look into it and get back to me. It has already been three months and I am still waiting for feedback.

Inadequate government inspections

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A South Asian worker employed through a subcontractor as a solar panel installer at the Mohammed bin Rashid Al Maktoum Solar Park reported effective government inspections:

The government inspector comes to the park and checks how the new project is going. The inspector asks us how the company is treating us and what we think can be done to improve the working conditions.

The opportunity to engage with government inspectors, however, is not common for workers in the renewables sector in the UAE. A migrant worker employed as an electrical technician at Al Dhafra Solar PV described how working conditions changed during government inspections:

They come once in three months to check the working conditions and ask us how the management is treating us. During the inspections a lot changes. For instance, we are served nice food in the workplace. Then, after the inspection is done, things go back to normal.

A security guard employed at Siemens Energy described government inspections as inadequate because they fail to address working conditions:

There are government inspections, but they're mostly focused on the machinery and equipment we use on the premises. It's not really useful to the workers but to the consumer and the company as a whole.

An East African worker employed through a subcontractor as a security officer at Mohammed bin Rashid Al Maktoum Solar Park noted that government inspections did not adequately address working conditions:

The Government does inspections once in a while, but they are not very thorough and do not give thought to the workers, making them less effective.

A worker from Central Africa employed as a solar installer at Mohammed bin Rashid Al Maktoum Solar Park also reported that government inspections did not consider working conditions:

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There are government inspections, but they only check the standards of the systems we put in place instead of checking what we go through which isn't effective for us.

A South Asian worker employed as a crane operator by a subcontractor at Noor Abu Dhabi Solar Plant reported that government inspections did not include working conditions:

The government makes sure the building to be erected is in an appropriate location. They don't check the working conditions.

## VIII. Exploitation at Expo City Dubai

Expo City Dubai—the main site of Expo 2020 and the upcoming site of COP 28—is a 438-hectare area (1083 acres) located near Dubai's southern border with Abu Dhabi. The building has been described by COP 28 organizers as a “state-of-the-art destination built to promote sustainability and circularity principles.” As part of their sustainability commitment, Expo City Dubai has installed renewable energy systems with a combined total capacity of 5.5 megawatts on all permanent building projects across the site. Expo City Dubai has also invested heavily on minimizing carbon footprint, reducing water consumption, using sustainable materials and ensuring sustainable events and operations management.

Addressing long drawn criticisms on labour violations in the UAE, the Expo City Dubai has also developed a ten-principle worker welfare policy that all employers working within the Expo City Dubai are required to follow. Since Expo City Dubai is a free zone, the workers are governed by employment rules and regulations set by the free zone authority, and not by UAE Labour Law.

The 10 principles of the Expo City Dubai Worker Welfare Policy state that all employers must:

- Ensure fair and free recruitment

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- Ensure that employees understand the terms and conditions of their employment
- Treat employees equally and without discrimination
- Protect and preserve the dignity of employees and not tolerate harassment or abuse of any kind
- Respect the right of employees to retain their personal documents
- Pay employees' wages and benefits on time and in full
- Allow employees freedom to exercise their legal rights without fear of reprisal
- Provide a safe and healthy working environment
- Provide access to grievance mechanisms and remediation
- Ensure that bonded, indentured, forced, or child labour is not used

Despite the worker welfare policy, research by Equidem has documented violations of almost all ten principles by multiple employers, and a continued prevalence of illegal recruitment fees, withholding of wages and benefits, and a lack of knowledge about grievance mechanisms among migrant workers employed at Expo City Dubai.

#### Nationality-based discrimination and racism

Despite the anti-discrimination clause in the Expo City Dubai worker welfare policy, workers reported to Equidem that companies still prioritize a candidate's nationality over their skills. A West African worker employed as a sales assistant described nationality-based discrimination:

There is discrimination towards Africans. Europeans always get good stations and new products to sell while we Africans are mostly allocated slow moving stations to push for old items in the store.

A migrant worker employed in food services at Expo City Dubai described discriminatory treatment from his supervisor:

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There is colour discrimination. I see white workers get better treatment from my boss. You can really tell when he's under pressure from the customers, but I don't hear him yelling at the European workers.

A migrant woman worker employed in food services at Expo City Dubai reported that her wages had not been increased as promised:

I feel there is racial discrimination as the only black lady in the team. They are always hiring light skinned ladies to the same position.

A migrant worker employed as a bartender at Expo City Dubai described facing racism at work:

There is racing among my colleagues. It sometimes gets too much. One time staff from the same country made a tribal chart and left me behind looking at them and laughed at the top of their voices.

#### Recruitment fees

Although the principles of the Expo City Dubai Worker Welfare Policy call for employers to ensure fair and free recruitment, migrant workers employed in Expo City Dubai, continue to pay hundreds of dollars in illegal fees to recruitment agents to secure their jobs. The practice of charging recruitment fees allows companies to pass on the costs of recruitment to workers, leaving many deep in debt. Most workers interviewed by Equidem said they were required to pay recruitment agents in their home countries, with the average fee being around USD 400.

The true costs of recruitment, however, is likely to be significantly higher, as these figures may not include additional costs such as medical tests, or the interest paid on loans taken out to pay recruitment fees.

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A migrant woman worker employed as a waitress in Expo City Dubai reported paying USD 300 in recruitment fees:

I paid USD 300 to register with the agent, for my medical forms, and in recruitment fees. I did not know that these costs should be paid by my employer.

A worker employed in the service sector at Expo City Dubai described taking a loan to pay recruitment fees

I paid 400 USD in fees for a medical exam, recruitment, and air tickets. I took a loan at 7% interest to pay these fees.

In fact, paying recruitment fees as a common feature of the employment process for numerous workers holding a range of jobs in Expo City Dubai. A security guard from Africa employed through a subcontractor for Siemens Energy reported paying 400 USD in recruitment fees. A West African worker employed as a sales assistant reported paying USD 450 in recruitment fees. An East African worker employed as a cleaner through a subcontractor reported paying USD 400 in recruitment fees. Another East African worker hired as a sales executive by Siemens Energy reported paying USD 450 in recruitment fees. A migrant worker employed delivering newspapers in Expo City Dubai reported paying USD 300 in recruitment fees.

#### Understaffing and extended working hours

The Expo City Dubai Workers Welfare Policy calls for a safe and healthy working environment. Equidem research found, however, that migrant workers in Expo City Dubai work long days, sometimes lasting up to 12 hours each day, with only one day of rest each week. Although some workers said their shifts technically ran for 12 hours, they tended to start their workdays much earlier than their designated working hours. Many workers spent up to an hour or two before their shift began preparing for work as they needed to get ready in overcrowded accommodations and be at their transport points to be fetched by the subcontracting companies—adding up to an additional two

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hours to their already long 12-hour shifts. Workers reported feeling extreme fatigue because of the extended work hours. A security guard from Western Africa employed through a subcontractor, described understaffing and overwork:

In my department, there are 20 security officers. The company hasn't hired enough. Sometimes I need a reliever to take a break and I don't get one. I have to work extra hours and even work without days off. It is not manageable. I usually work 12 hours a day and the normal working hours in the UAE are supposed to be 9 hours a day

An East African worker employed as a cleaner through a subcontractor described understaffing in his department, making it difficult to complete assigned tasks:

We are a small team of five workers in my department, and I don't think we are enough to do the tasks they give us. It is very tiring. The supervisors work us like donkeys. At times I feel like I will faint from exhaustion.

A South Asian worker employed as a driver through a subcontractor delivering solar systems reported understaffing and overwork:

We are a team of 10 drivers. I think they can add more drivers. I pack the systems alone. It would be much better if I could get help to load and off-load the systems. By myself, it is hard for me to complete the work in the allocated amount of time.

A migrant woman worker employed as a waitress in Expo City Dubai reported working two hours of overtime each day:

I work 11 hours a day and 66 hours a week with two hours of daily overtime.

A migrant worker employed in food services at Expo City Dubai reported working extended hours six days a week

I work 12 hours a day and 72 hours a week. 3 hours are extra hours.

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## Verbal abuse

The Expo City Dubai Workers Welfare Policy calls upon employers to protect and preserve the dignity of employees and not tolerate harassment or abuse of any kind. Violating this policy, workers reported verbal abuse from their supervisors. A security guard from West Africa employed through a subcontractor, described verbal abuse:

My supervisor is very rude. He even swears and calls me names that I can't even mention here – it is very common

Another worker from West Africa employed as a sales assistant described verbal abuse at work:

My supervisor is the worst person I have ever worked with. She is racist and yells at African workers more. One time she yelled at me because I mistakenly charged the customer twice. I can't stand being shouted at. Mentally, it has drained me, and I am not psychologically the same as I used to be.

A migrant woman worker employed as a waitress in Expo City Dubai described rude treatment from her supervisor:

My supervisor is rude. When it's very busy, then the supervisor panics and starts ordering people around and demanding things from us in a rude way.

A migrant worker employed in food services at Expo City Dubai reported verbal abuse by his supervisor:

In the kitchen, when we are busy my supervisor shouts at the top of his voice. It happened recently when the kitchen was full, and orders were flying [my supervisor] was still shouting at me as if the orders were delayed.

A migrant woman worker employed in food services at Expo City Dubai also described being yelled at by her supervisor:

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It is very common for my supervisor to yell at me when it's very busy or when I make a mistake. There was a day I made a wrong reservation in terms of the number of guests. My supervisor was very upset, and he really yelled at me at the top of his voice.

### Wage theft

The Expo City Dubai Worker Welfare Policy calls for employers to pay employees' wages and benefits on time and in full. Violating this policy, African and Asian migrant workers employed in Expo City Dubai reported withheld overtime payments in violation of contractual agreements, delayed payments, wage stagnation, failure to provide sick leave, and delayed and inadequate food allowances.

### Unpaid or underpaid overtime

An East African worker employed as a cleaner through a subcontractor described not receiving the overtime payments he was promised in his contract:

They don't pay overtime, and, in the contract, it is mentioned that they will pay overtime. Instead of overtime payments, they sometimes give us an extra day off, but it's not guaranteed.

A migrant worker employed in food services at Expo City Dubai reported regularly working overtime but not receiving full overtime payments:

They pay us overtime but not in full since they say business hasn't stabilized due to the end of the Expo.

### Delayed payments

A security guard from West Africa employed through a subcontractor, reported delayed food allowance and salary payments:

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Our salary is paid but late. In the contract it is mentioned that it will be paid every 25<sup>th</sup> but they sometimes delay it up to the 5<sup>th</sup> of the next month. Food allowance is given together with the delayed salary. This is frustrating because I am forced to ask for food on credit from my regular vendor until I get my allowance.

Another West African worker employed as a sales assistant described irregular salary and food allowance payments:

Our salary payment is made every month, but they don't have a specific date to pay the salary. They are always delaying the salaries up to the sixth and even sometimes the tenth of the month. This really delays my bills, and I am forced to pay extra for the same services.

An East African worker employed as a cleaner through a subcontractor described delayed payments-sometimes up to two months:

They pay my salary with up to two-month delays. This really impacts my monthly bill payments and I look bad in front of my landlord and family.

### Wage Stagnation

A worker employed in food services reported stagnant wages since 2021, despite inflation in the UAE:

I can't afford healthy food. My wages have been the same since 2021 but since then life has really gone up in the UAE with inflation in most basic commodities.

A migrant worker employed in food services at Expo City Dubai reported not getting the wage increases he was promised

They promised a pay rise every financial year which I don't see them implementing.

A migrant woman worker employed in food services at Expo City Dubai reported that her wages had not been increased as promised:

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They have promised a salary increment every year but I haven't seen it in my account.

#### Failure to provide paid sick leave

A security guard from Western Africa employed through a subcontractor reported that he did not get paid sick leave:

Sick leave is given unpaid, so we prefer to report to work sick and persevere, so we don't miss the day's wages.

An East African worker employed as a cleaner through a subcontractor described being denied paid sick leave:

Sick leave is not given unless one is injured at work and furthermore it is unpaid.

#### Occupational health and safety

Although the Expo City Dubai Workers Welfare Policy calls for a safe and healthy working environment, workers on the site are exposed to heat stress while working outside for long hours in extreme temperatures.

#### Heat Stress

A migrant woman worker employed as a waitress in Expo City Dubai reported exposure to the heat since her workstation is outside:

I am exposed to excessive temperatures and heat since I work in an open venue.

A migrant woman worker employed in food services at Expo City Dubai described being fearful of getting skin cancer due to high levels of exposure

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I am exposed to the heat which is a problem and can cause skin cancer if I work there for a long time.

#### Exposure to toxic cleaning materials

An East African worker employed as a cleaner through a subcontractor described allergic reactions to the cleaning materials used at work:

The chemicals I use to clean cause allergic reactions to my skin - and this will cost me money to see a doctor and get treatment.

#### Overcrowded and unhygienic accommodations

In stark violation of the commitment made in the Expo City Dubai Workers Welfare Policy to a safe and healthy working environment, African and Asian migrant workers living in employer-provided housing reported crowded and unhygienic accommodations. A West African worker employed as a sales assistant described living in overcrowded and poorly ventilated accommodations:

I share a room with 15 other workers. This is not healthy. There is no proper ventilation in the room where I stay.

A security guard from West Africa employed through a subcontractor, reported overcrowded accommodations:

I share accommodation with 19 security guards instead of eight as was specified in my contract.

A worker employed as a tea girl and cleaner reported crowded accommodations:

Accommodation is shared between nine ladies although in the contract it says there will only be six girls in the small room.

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An East African worker employed as a cleaner through a subcontractor described overcrowded accommodations:

My accommodation is a real struggle. I am sharing with more than 15 other workers and it's difficult to get a decent sleep because there are so many different people in the same room.

A migrant woman worker employed as a waitress in Expo City Dubai reported that her accommodation had more occupants than was specified in her contract:

Accommodation is in a shared apartment, and I share a room with five ladies but in the contract, it was mentioned there would be only four in a room.

A migrant worker employed in food services at Expo City Dubai reported double the occupancy he was promised in his contract:

My accommodation is in a shared apartment, and I share a room with four others. In my contract it is mentioned we will be only two in a room.

A migrant woman worker employed in food services at Expo City Dubai described being unable to find any privacy in her overcrowded accommodation:

My accommodation is in a shared apartment. I am sharing with five other ladies and in the contract, it clearly states that I will share with only one other lady to make it two ladies per room. This makes the room congested without any privacy.

A migrant worker employed as a bartender at Expo City Dubai reported being unable to sleep due to overcrowding in his accommodation

I share my room with five people making us six in a room while in the contract it was supposed to be only four in a room. It gets noisy and at times and I can't sleep in peace after a long day at work.

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## Food insecurity

A migrant worker employed delivering newspapers in Expo City Dubai described his food allowance as insufficient:

My food allowance is given together with my salary, but they need to increase it since costs have really risen.

A migrant woman worker employed as a waitress in Expo City Dubai described inability to afford nutritious food:

I can't afford healthy food. I end up using my tips to buy food because they give us the same food all the time in [the restaurant] when we are working. They sell us food in the accommodation.

A migrant worker employed in food services at Expo City Dubai reported that his food allowance did not cover his monthly food expenses:

A food allowance is given monthly but it's not good enough to take me through the month.

A migrant worker employed as a bartender at Expo City Dubai described borrowing money to afford food:

My food allowance is given with my salary, but it is not enough. Sometimes I run out before the month ends and I am forced to ask for loans to facilitate my food. Otherwise, I have to skip some meals or eat from the staff area where the food is not very good.

An East African worker employed as a cleaner through a subcontractor described inadequate and delayed food allowance payments – sometimes up to two months – making it difficult for him to afford food in Dubai:

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The food allowance is really on the lower side. It is given together with the salary payment. This makes life difficult because sometimes it is delayed up to 2 months and I struggle to feed myself here in Dubai.

A West African worker employed as a sales assistant described her food allowance as insufficient to cover costs of food in the UAE:

My food allowance is paid together with my salary, and it is not enough for me for the month. Sometimes I skip meals.

Inadequate grievance channels at Expo City Dubai

An East African worker employed as a security guard described the benefits associated with the Expo City Dubai helpline:

For Expo City Dubai they have a helpline where your complaints can be logged in anonymously if you choose. It is managed by an external company (subcontractor). Complaints that are not anonymous tend to put you in a corner sometimes but those that I had were dealt with effectively and didn't require anonymity.

Workers hired directly by Siemens at Expo City Dubai also described effective procedures for reporting rights violations. A worker hired as a sales executive by Siemens Energy explained:

There are serious procedures for rights violations given by the Company. The violators will be punished and dealt with accordingly.

Workers hired through subcontractors on the same site, however, described a different experience. A worker employed in the service sector through a subcontractor described raising a complaint around her hours and receiving no relief:

I made a complaint about my schedule and spoke to my manager. He said he would see what to do, but my issue was never addressed. I am still doing the same long schedule to date.

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A migrant woman worker employed in food services at Expo City Dubai reported making a complaint about unpaid overtime but not seeing any results:

I made a complaint about not being paid for overtime even though I work at least one hour of overtime every day. The only feedback they gave me was that I need to wait a bit more so that they can implement overtime.

## IX. Exploitation in the Delivery Sector

Waiting in the UAE for employment

Workers employed in the food service delivery sector by subcontractors for food delivery companies including Talabat reported company practices of requiring workers to wait for nine to ten months within the UAE without employment due to delays in processing their licenses. A South Asian worker employed through a subcontractor for a food delivery company described waiting nine months for employment:

The first 9 months I had no work as I did not have a licence. I did not get paid. After that, I had to bear my own food and accommodation costs. They processed my licence and visa only after 6 months.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported a similar practice:

I have been in the UAE for 18 months now. For the first 10 months I was unemployed. The vendor (contractor) finally gave this job after waiting for 10 months. I had to bear all costs of food and accommodation for 10 months on my own.

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These practices allow delivery companies and their subcontractors to access workers who are on-call and ready to start working without bearing any costs until the period of employment begins. A South Asian worker employed by a subcontractor for a food delivery company reported waiting six months in the UAE without pay for employment:

I arrived in the UAE in December 2021 and resided in Sharjah for approximately two months without employment. The agent had initially sent me on a visit visa, for which I paid 45,000 Nepalese rupees [USD 339]. During the first two months, [the agent] provided food and accommodation. However, after this period, the agent ceased to provide these amenities. It wasn't until July 27, 2022, that I finally received my work visa.

Another South Asian worker employed by a subcontractor for a food delivery company reported that after fourteen months he was still waiting for employment. In response he pursued legal action through the labour court to obtain an employee ID. Although he received an employee ID, he reported that he was rarely assigned any deliveries and therefore unable to meet salary targets and send remittances home:

I arrived in the UAE 14 months ago. It took me three months to obtain my visa, and then an additional eight months to secure my license. Despite this lengthy period, I was not offered any job opportunities. In response, I pursued legal action by approaching the labour court because the company failed to provide me with any work. After I complained to the labour court, they provided me with login access to an existing employee's ID. Through that ID, I only got 3-4 orders a month. The company deducted 500 dirhams [USD 136], sending me only 2,000 dirhams [USD 544] a month. I have been living this nightmare for over a year now. I have no income to send to my family back home.

Forced labour indicators

[Debt to the employer](#)

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Delivery service workers employed by subcontractors for food delivery companies including Talabat reported taking loans from their employers to cover the costs associated with visa and licensing fees. They repay these loans through monthly salary deductions and are unable to leave employment with the company until the loans have been paid.

According to the International Labour Office Special Action Programme to Combat Forced Labour, workers incurring debt to cover recruitment, transport, or daily living expenses reflects an imbalance in power between the worker-debtor and the employer-creditor. This dynamic has the effect of binding the worker to the employer and does not resemble taking a normal loan from a bank or independent lender on mutually agreeable and acceptable terms. Accordingly, the ILO recognizes debt to an employer as an indicator of forced labour. A South Asian delivery sector worker employed by a subcontractor for a food delivery company reported that the expenses the company incurred on his behalf for food and accommodation were treated as an advance against his future salary:

I refrained from any work activities until I obtained my license and solely attended the license school during that period. As per my initial agreement, the company was responsible for providing me with food and accommodation until I obtained my license. However, the company now claims that the expenses incurred for food and accommodation were treated as an advance against my future salary.

Another worker employed by a subcontractor for a food delivery company reported going into debt with the employer to cover his visa fee and accordingly facing monthly salary deductions to repay this debt:

The company is deducting 500 dirhams [USD 136] each month from my salary for the visa fee.

A South Asian worker employed by a subcontractor for a food delivery company also reported monthly salary deductions to pay the debt he owes to his employer:

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I have not been able to send money to my family yet. My company is deducting my visa and license costs. I do not have enough money to send home. I must pay for accommodation, food, petrol and other things. It is very expensive.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported that he was required to take a loan from the company in order to cover the costs of his employment visa. In order to repay this loan, the company deducts 300 AED [USD 82] from his salary each month:

I paid 7,200 dirhams [USD 1,960] for visa expenses and 4,500 dirhams [USD 1,225] for my driving license to the company. Then they processed my visa. I paid the 4,500 dirhams for my license but the 7,200 was a loan from the company. I am still paying that amount. Every month the company deducts 300 [USD 82] from my salary.

Another delivery service worker employed by a subcontractor for Talabat reported monthly deductions from his salary to repay visa and license fees.

Each month, the company is deducting 500 dirhams [USD 136] from my salary for visa and license. I do not get a receipt to be sure.

Another worker employed by a subcontractor for Talabat also reported monthly salary deductions to pay off licensing fees:

The license costs 4,500 dirhams [USD 1,225], while the visa expenses amount to 7,000 dirhams [USD 1,906]. The visa fee is a one-time upfront payment, and the license fee can be paid in installments. The company deducts 300 dirhams [USD 82] from our monthly salary for the license.

A delivery service worker employed by a subcontractor for Talabat described being unable to leave his employment with his subcontractor until his debt was repaid:

Each month the company deducts 300 dirhams [USD 82] from my salary. I owe them 7,300 dirhams [USD 1,988] for my visa and license fee. We can go to other companies only after paying our visa and license fees.

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A fourth South Asian delivery service worker employed by a subcontractor for Talabat also reported not being able change his job without clearing his debt with the company:

I need to clear my dues before I can change jobs. If you ask the company to let you go, the first thing they will say is 'clear my money then do what you want to do'.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported not being able to change jobs or leave the country without clearing his debt with the company:

First workers must clear any debt they have. My friend had to pay his license fee. He could not go home because he had not cleared his debt.

#### Holding identity documents

Despite laws preventing employers from holding worker passports, migrant workers employed in the delivery sector in the UAE reported that employers hold their passports, preventing them from leaving their jobs and seeking new employment opportunities. This inability to seek alternate employment provides workers with a disincentive for reporting rights violations. A South Asian delivery service worker employed by a subcontractor for Talabat reported that his employer was holding his passport until he repaid the costs of his license fee:

My passport is with the employer. I will get it back after I have repaid my debt. The company paid for my license fee. I need to repay it before I can change jobs. I also need to show reason why I want to change my job.

Migrant workers in the delivery sector described being required to hand over their passports to their employers as common practice. Another delivery service worker employed by a subcontractor for Talabat reported submitting his passport as soon as he arrived in the UAE:

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I submitted my passport as soon as I landed in the UAE. They said my passport was required to start my visa processing. We can get it back if we have legitimate reasons like going back to our country, etc.

A Nepali national employed by a subcontractor for Talabat reported being unable to leave the country and moving around within the UAE using an Emirates ID:

My passport is with the employer. There is no passport to go home or other places. I have an Emirates ID, which helps me to move within the UAE.

A Bangladeshi national employed by a subcontractor for Talabat explained that handing over his passport was a condition of employment:

Our passports have been submitted to the company. Although government regulations suggest that we should retain possession of our passports, the company informed us that if we did not submit our passports, we would not be offered employment. We felt compelled to submit our passports to the company.

Another South Asian worker employed by a subcontractor for Talabat explained that all workers in the company are required to give their passport to the company:

My passport is with the company. We all have to give our passports. Without the passport the company cannot proceed to make our documents like licenses, visa etc.

While these subcontractors may initially require workers to hand over their passports to pursue licensing and visas, workers report that the company holds their passport long after these initial onboarding steps are complete. A South Asian worker employed by a subcontractor for Talabat reported that he was only given his passport when he travelled home:

I only get my passport back while going home.

Another South Asian worker employed by a subcontractor for Talabat explained that he would get his passport back when he resigns:

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My company is holding my passport. I did not ask to return it yet. When I resign, I will get that.

A delivery service worker employed by a subcontractor for a food delivery company reported that he would only be given his passport after he finished paying off the debt that he incurred to the employer for paying off his license and visa:

My company is in possession of my passport and I am unable to retrieve it without paying the full expenses for the license and visa, which amounts to 9,000 dirhams. The company insists on deducting these expenses from my monthly salary, and I can only reclaim my passport after these costs have been completely covered.

A South Asian worker employed by a subcontractor for a food delivery company also reported being unable to get his passport back until he paid off debt to his employer:

Yes, the company is holding my passport. I cannot get back my passport without paying the full expense of my license and visa. The company is asking me to pay a total of around 8,000 dirhams. Every month, they are deducting those expenses from my salary. After clearing those expenses, I will get back my passport.

A South Asian worker employed by a subcontractor for a food delivery company reported handing over his passport to the company as collateral for the company bike:

The bike is given by the contractor. When I take the bike, I need to submit the passport and when returning the bike, the passport is given back.

In this exchange, the company secures their asset by ensuring that the worker can neither seek alternate employment in the country nor leave the country. A South Asian worker employed by a subcontractor for a food delivery company reported filing a complaint in court to get his passport back from his employer:

Since my passport is with the company, I have filed another complaint at the court to get my passport back. I am hoping to get another job after I get my passport back.

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Another South Asian delivery service worker employed by a subcontractor for a food delivery company described the practice of holding worker passports to ensure they don't leave the job as a common practice across sectors in the UAE:

Before I joined [the company], my passport was with my initial employer. For emergencies that required travelling back home they used to take money as a security in case I don't come back from Pakistan. At [the company] too, my contractor has kept my passport.

#### Deceptive recruitment practices

Workers employed in the food service delivery sector by subcontractors for food delivery companies including Talabat described being presented with terms of employment during the recruitment process that were not upheld once they reached the UAE.

According to the International Labour Office Special Action Programme to Combat Forced Labour, an employer's failure to deliver what has been promised to the worker either verbally or in writing amounts to deception—an indicator of forced labour. In the delivery sector in the UAE, workers employed by subcontractors for food delivery companies including Talabat reported false promises regarding working conditions, wages, and access to paid food and accommodation. A South Asian service worker employed by a subcontractor for Talabat reported changes in the terms of his employment in violation of the written recruitment agreement that he signed:

I am not getting anything as agreed. They did not even give me a copy of the agreement after I signed it. I was supposed to get food, accommodation, fuel charges, and at least 500 deliveries per month. Now, I must pay for my own food and accommodation. I get 300-350 trips per month. I only get 7.5 dirhams [USD 2] per delivery.

A South Asian worker employed by a subcontractor for Talabat reported violation of the terms of employment presented by a recruitment intermediary—including the promise of a regular monthly payment rather than ride-based payments:

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I was informed [by an agent in Nepal] that the company would cover all expenses until I obtained my license. However, this was not the case, as I had to cover all the costs. I am not receiving what was agreed upon in my contract. The agent in Nepal made significant commitments, which led me to accept a visit visa. I was assured a monthly payment of 5,000 dirhams [USD 1,361]. I did not know that my earnings would be based on the number of rides I completed.

#### Excessive overtime and inability to take breaks

Under UAE labour law, normal working hours for the private sector are eight hours a day and workers may not work for more than five consecutive hours without a break of not less than an hour, two overtime hours a day, or more than 144 hours during a single three-week period. Violating UAE labour law, workers employed in the delivery sector, reported being required to work 12-to-14-hour shifts, 7 days a week. According to the International Labour Office Special Action Programme to Combat Forced Labour, situations in which an employee is made to work more overtime than is allowed by national law under threat from an employer suggest forced labour. A South Asian worker employed by a subcontractor for Talabat reported working excessive overtime under threat of incurring fines if he didn't reach delivery quotas:

In this workplace, there is no consideration of work hours. We are expected to work a minimum of 12 hours per shift, and sometimes it extends to 14 hours. If we make a mistake, and the supervisor happens to notice it during their rounds, we face suspensions ranging from three to seven days. Additionally, we are on duty seven days a week. Meeting a monthly quota of 350 deliveries is mandatory and failing to do so results in fines.

A South Asian worker employed by a subcontractor for a food delivery company reported working 16-hour shifts:

I do the full 16 hours of duty because my income depends on the number of deliveries I make.

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A South Asian worker employed by a subcontractor for a food delivery company reported working up to 15 hours a day to earn the wages he requires to support his family:

I make as many deliveries as I get to earn more money. I need the money to support my family. I work up to 15 hours a day.

A South Asian delivery service worker employed by a subcontractor for a food delivery company described the physical toll of 12 hours shifts without breaks to eat:

The schedule is 12 hours continuously on the road with no time to eat food. Today's duty was 7 am to 7 pm, tomorrow it will be from 12 pm to 12 am, and then again from 7 am to 7 pm. All of this leads to difficulty sleeping. I don't feel good at all. They tell us when to work. There are duty rosters. Even if I do a night duty, they will put us in a morning shift the next day.

Another South Asian delivery service worker employed by a subcontractor for Talabat described pressure not to take breaks because to do so would impact his performance ratings and income:

If I take a break, they will decrease my performance rating and I will not get good shifts. Talabat ranks the workers in four groups. Group one gets first choice in shifts. The shifts they reject will then go to group two, three, and four workers. Factors including how long I take for breaks, how often, how often I take leave, and how quickly I accept delivery offers all determine my performance rating.

A South Asian delivery service worker employed by a subcontractor for Talabat reported that taking breaks due to back pain resulted in odd shifts with fewer orders and, as a result, less pay:

If you take more time off, you will not get good delivery hours. You will have to work odd hours which others have rejected. I took breaks due to my back pain, but I ended up getting less orders.

As a result of these policies, workers in the delivery sector work 12-to-16-hour shifts without breaks under threats of penalty—an employment structure that suggests forced labour practices in the industry.

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### Withholding wages

According to the International Labour Office Special Action Programme to Combat Forced Labour, withheld wages are indicator of forced labour, especially when wages are systematically and deliberately withheld, and the worker is denied an opportunity to change employers. A South Asian worker employed by a subcontractor for a food delivery company reported that despite working 16-17 hours a day, the company did not pay him for ten months and then refused to return his passport unless he paid a fee—preventing him from leaving the job. He was able to leave the UAE with assistance of the Nepali Embassy but returned to Nepal without his passport:

I got my visa and license only on 15 October 2022. After that I joined [the company] as a delivery boy on 31 October 2022. I worked till August 15, 2023 but I didn't get any salary. I worked 16-17 hours per day. Then I asked them to return my passport. The company asked me to pay 8,000 dirhams [USD 2,178] to return my passport. I was not able to pay that amount, and I requested the Nepalese embassy in UAE, and they managed an out pass for me to leave the UAE. After preparing the out pass from the embassy, I came to Nepal without a passport.

In this case, the combination of debt to the employer, excessive overtime, withheld wages, and inability to leave the employment without outside intervention establishes a clear case of forced labour.

### Unfair recruitment practices

#### Recruitment fees

A South Asian delivery service worker employed by a subcontractor for Talabat reported being required to pay recruitment fees in Nepal as well as visa and licensing fees:

I am not getting anything according to my agreement. I had a verbal agreement with the recruitment agency in Nepal before I came to the UAE. They asked me to pay 420,000 (Nepalese) rupees [USD 3,159]. I was told that after paying that amount in Nepal, the company will pay for visa, license fee, food and accommodation. After I came to UAE, none of this

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happened. I am covering everything on my own. Upon that, the company is making me pay 7,300 dirhams [USD 1,988] for visa and license fees again.

A Nepali delivery service worker employed by a subcontractor for Talabat said he had taken a loan at a 60% interest rate to pay his recruitment fee:

The agency asked me to pay 480,000 (Nepalese) rupees [USD 3,610]. They would not process my visa without me making the payment first. I had to take a loan at 60% interest rate from a local money lender.

A Nepali worker employed by a subcontractor for a food delivery company reported being charged for an employment visa but receiving only a visit visa:

I visited the Recruitment Agency in Kathmandu, where I underwent an interview conducted by one of their representatives. During the process, the agency requested 400,000 (Nepalese) rupees [USD 3,008] for a visa and ticket, which I duly submitted. It was only after arriving here that I discovered that the visa provided was a visit visa, and not as initially represented.

Payment of recruitment fees was common among Nepali workers employed by subcontractors for food delivery companies including Talabat. A Nepali worker employed by a subcontractor for a food delivery company reported paying NPR 350,000 [USD 2,632] as a recruitment fee. Another Nepali national employed by a subcontractor for a food delivery company reported paying NPR 350,000 [USD 2,632] to a manpower company for his visa, tickets, and other fees. A Nepali national employed by a subcontractor for Talabat reported paying NPR 500,000 [USD 3,761] in recruitment fees. A Nepali national employed by a subcontractor for a food delivery company reported paying NPR 320,000 [USD 2,407] to a manpower company for his visa, tickets, processing, and other fees. Two Nepali nationals employed by a subcontractor for reported paying a sum of NPR 300,000 [USD 2,256] as recruitment fees.

#### Failure to provide a copy of employment contract

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A South Asian worker employed by a subcontractor for Talabat reported that the company did not provide the copy of the signed contract: I did sign a contract, but I did not get a copy.

A South Asian worker employed by a subcontractor for a food delivery company reported contract violations.

They had promised me a fixed salary of 2,750 dirhams for 8 hours of daily work, including weekly leave. My contract explicitly states that the employer should provide the visa, cover medical fees, and provide a ticket—none of this was fulfilled.

## Wages

### Delivery-based wages

A South Asian worker employed by a subcontractor for a food delivery company reported that he was only informed upon arrival in the UAE that his wages would be determined by the number of deliveries completed:

I am not getting anything as per my contract. I was promised a salary payment of 2750 dirhams [USD 749] food allowance and overtime. I am only getting 10 dirhams [USD 3] per delivery. My monthly income is dependent on deliveries.

A South Asian worker employed by a subcontractor for Talabat explained, however, that the number of deliveries a worker is given to complete each day can be controlled by the supervisor and that supervisors use this power to discipline workers for late deliveries:

If we are late, or if our delivery is late, then the supervisor will keep us on hold for 30 minutes. It means that we will not get any orders for deliveries of 30 minutes.

### Wage theft

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As explained in the previous section, denial of wages and employment benefits, whether under written or unwritten employment agreements, has a devastating impact on workers across the global economy. These well documented practices of denying workers owed wages are called “wage theft.” Across the delivery sector in the UAE, our research found rampant wage theft practices. A South Asian worker employed by a subcontractor for Talabat described unfair salary deductions:

I had a verbal agreement with the employer regarding my visa. We agreed that the company would facilitate the visa process and, in return, deduct 5,000 dirhams [USD 1361] from my salary over time with a monthly payment of 100 dirhams [USD 27]. I have already repaid this amount but the company continues to deduct 100 dirhams from my salary—now stating that it is for insurance.

A South Asian delivery service worker employed by a subcontractor for Talabat reported arbitrary salary deductions justified by the company with a range of false explanations:

Every month they take 100 dirhams [USD 27]. Sometimes they say it’s because I delivered to the wrong customer. Sometimes they say the order count is wrong. These are all false claims. They just want to pay us less and are inventing new ways to deduct from our salary.

Another South Asian delivery service worker employed by a subcontractor for a food delivery company also reported arbitrary salary deductions:

Initially, my contractor would make deductions from my salary for various reasons, claiming that my performance was worse or that I was working fewer hours. They deducted amounts like 500 [USD 136] and 400 dirhams [USD 109], leaving me with just 1,000 dirhams [USD 272], and even that was mostly consumed by expenses.

A South Asian delivery service worker employed by a subcontractor for a food delivery company reported that his employer made him sign a fraudulent document stating he had taken advance payment from the company—and used this document to systematically deduct 500 dirhams from his salary each month:

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The company made a fraudulent document saying that I had received 14,000 dirhams [USD 3,812] in advance payment from the company. I was asked to sign it inside in [the subcontractor's] office. I did not agree to this. They deduct 500 dirhams [USD 136] from my salary each month. They did not give me a copy of the document, nor are they providing any payment slips.

### Verbal abuse

Workers employed in the delivery sector for companies including Talabat reported verbal abuse from customers as well as supervisors. A South Asian worker employed by a subcontractor for Talabat described verbal abuse from customers:

Verbal abuse is quite normal here. Customers often misbehave with us. They shut the door in front of us. Sometimes the customer does not pick up the phone. Sometimes the customer does not want to eat if the food is late. If the food gets spoiled on the way back to the restaurants, then we must pay for the cost of the food. In some cases, the restaurant is late in preparing the food, but the customer does not understand.

A South Asian worker employed by a subcontractor for a food delivery company reported verbal abuse from the supervisor:

In instances where we experience delays due to heavy traffic, which is beyond our control, the supervisors shout at us.

### Threats of fines, suspension, and termination

A South Asian worker delivery service worker employed by a subcontractor for Talabat said that his employer threatened to suspend him if he refused to work during Eid:

Our company threatened us that if we don't do work in Eid, they will suspend us for 10 days.

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A South Asian worker employed by a subcontractor for Talabat reported that he worked under constant fear of penalty and employment termination:

We always have the fear of losing our jobs. I have no guarantee that I will not be suspended tomorrow morning. Here everything happens very suddenly. Actually, no human being is perfect. We also make mistakes and get punishment for it, that is not the problem. We also get punished if we can't work due to sickness or any other problem. We don't lose wages, but we get fined for any type of silly mistake.

Occupational health and safety

#### Risk of deadly accidents

A South Asian delivery service worker employed by a subcontractor for a food delivery company explained how his colleague died on the first day of duty due to lack of awareness of traffic rules:

Just a few months back, a new Pakistani rider died in an accident due to heavy traffic. He was new to traffic rules here. He died in his first day of duty.

Another South Asian delivery service worker employed by a subcontractor for Talabat described a high risk of deadly accidents for delivery workers on bikes facing congested and fast-paced road conditions:

This is a highly risky job considering the congested and fast-paced road conditions. Many Nepalese individuals have tragically lost their lives here. Being fortunate enough to survive a single week without an accident is considered a significant achievement, and for newcomers, the challenges are even more difficult.

A South Asian worker delivery service worker employed by a subcontractor for Talabat reported feeling unsafe during work:

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There is too much heat. The traffic is insane, especially during Eid and New Year. There is a high risk of death if you get in an accident. Many riders have died or had major accidents. I do not feel very safe with traffic. The bike is not very safe.

#### Health impacts—back pain, headaches, and dehydration

A South Asian delivery service worker employed by a subcontractor for Talabat said that he was suffering from back pain and dehydration due to long bike rides:

In the beginning, everything was fine. But when back pain started around one year back, my performance also declined. Now I do not earn any incentives as I am performing at an average. I am facing issues like back pain, dehydration, headache from riding long hours. I do not get proper sleep and cannot afford balanced diet. But what can I do? I need to take care of my family anyhow.

Another South Asian worker delivery service worker employed by a subcontractor for a food delivery company explained how riding bikes for long hours had affected his health:

Riding a bike for several hours is not good for health. I have back pain, piles and skin problems. Recently breathing issues have also started.

#### Denial of paid sick leave

Workers employed by subcontractors for food delivery companies including Talabat reported difficulty getting sick leave, and if they were granted sick leave, it was given as unpaid leave. A South Asian delivery service worker employed by a subcontractor for Talabat reported that he was not entitled to paid sick leave.

There is no sick leave. If I get sick, I let my supervisor know and do not go to work. I am not getting paid for the days I do not work.

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Another South Asian worker employed by a subcontractor for Talabat confirmed denial of paid sick leave, even in cases of injuries sustained at work:

We don't get any sick leaves. I had an accident and was confined at home for 20 days. I was not given any medical expenses or salary. I have borne all expenses myself. I have medical insurance, but it is only applicable in emergencies. Medical insurance does not cover minor accidents.

A South Asian worker employed by a subcontractor for Talabat reported that not only are workers denied paid sick leave, but they don't even get unpaid sick leave:

There are no sick leaves. What is paid sick leave then?

A South Asian worker employed by a subcontractor for a food delivery company reported that the company only gives leave in case of accidents:

Sick leave is granted solely in cases of accidents, with common illnesses not being treated as seriously. Since it's a commission-based job, there is minimal concern for our health and well-being, and the responsibility for our health lies entirely with us.

A South Asian worker delivery service worker employed by a subcontractor for Talabat reported that workers employed by the subcontractor do get sick leave, but it is not paid sick leave:

We get sick leave, but it is not paid.

Similarly, another worker employed by a subcontractor for Talabat reported that he can take leave if sick, but it is unpaid:

We get paid for the days we work. If I am sick, I just inform the company and do not go to work. There is no sick leave.

### Challenges in using health insurance

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A South Asian delivery service worker employed by a subcontractor for Talabat reported that he did not have a health insurance ID card or know which hospitals are covered despite paying for his insurance. He was also under the assumption that though he worked in Abu Dhabi he would have to travel to Dubai for his medical treatment:

I pay for my insurance, but the company has not given me an ID card. My insurance has also been done in Dubai so if I need any medical treatment, I need to go to Dubai. This is quite a distance to travel from Abu Dhabi. I do not even know which hospitals are covered by the insurance.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported similar difficulties in accessing health care:

I am based in Abu Dhabi, but my insurance only covers care in Dubai. To get care that was covered I will have to go all the way to Dubai.

A South Asian worker employed by a subcontractor for Talabat reported that he was not given an insurance card and instead told to use a mobile app for verification. When he reached the hospital, he found that the app did not work, and he had to pay out of pocket:

I do not have an insurance card. Although I am insured, my insurance is not working. I got sick once and went to the hospital. I was told that the insurance will work through a mobile app. It did not. My friends also tell me that their insurance is not working. There is an app called 'Dubai Insurance App'. It does not work at all. We can access hospitals, but it is at our own expense.

Barriers to seeking relief in cases of rights violations

Inability to seek relief through company channels

A South Asian worker employed by a subcontractor for Talabat reported that despite reporting payments below the contractually agreed among, he got no response from the human resources (HR) manager or supervisor:

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I have complained to my employer. I did not get paid according to my written agreement. I submitted a complaint to the HR manager and supervisor. I complained but nothing happened. Since I paid a lot of money to come here, I have no choice but to keep working.

Another South Asian delivery service worker employed by a subcontractor for Talabat reported that he received no response when he lodged complaints through the subcontractor:

Several of us have registered complaints with the [subcontractor], but regrettably, they have not taken any action. We were explicitly instructed not to lodge complaints directly with Talabat. Instead, we were told to channel our complaints through the company, and they assured us they would forward the concerns to Talabat. Unfortunately, despite this process, no resolutions or actions have been taken to address our complaints.

A South Asian worker employed by a subcontractor for Talabat reported that neither the subcontractor nor Talabat would take responsibility for wage deductions from his salary:

I complained to my supervisor asking why the company is still deducting my money. I have not had the chance to follow up with my supervisor face to face. He said that he would get back to me but he has not. When I talk to Talabat, they say to talk to [the subcontractor]. [The subcontractor] too does not respond well.

Another South Asian worker employed by a subcontractor for Talabat reported challenges in seeking relief because aside from his supervisor, he had no other direct contact with company management in an app-based system where all other interactions were online:

If the supervisor imposes any form of punishment or takes disciplinary action, we are left with no option for filing complaints or seeking solutions. Given the entirely online nature of the system, we are unsure about who else we can approach with our complaints and the appropriate procedure to follow.

#### Challenges in seeking relief through government channels

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A South Asian delivery service worker employed by a subcontractor for Talabat explained that the time required to pursue complaints creates a financial burden since payment is determined by deliveries completed:

I never approached any court or police station. Usually, our complaints are settled between us. It is very difficult to submit a complaint here. There is this thing of added financial burden. In our work, payment is determined by time.

A South Asian worker employed by a contractor for a food delivery company recounted that even after receiving a favourable judgment, the employer did not remedy the rights violations:

Our passports are held by the company. The labour court ordered the company to return our passports, but we have yet to receive them.

## Recommendations

### United Arab Emirates government

#### Respect migrant worker human and labour rights

- Extend labour rights protections to all migrant workers.
- Ensure all workers are paid equally for equal work, regardless of their nationality or any other protected characteristic.
- Strengthen, implement and enforce the prohibition on discrimination as outlined in Federal Law No. 33, addressing both direct and indirect forms of discrimination and extend these protections to all workers regardless of their nationality or occupation. Consistent with ILO recommendations, ensure that the prohibition on discrimination includes a specific provision defining and explicitly prohibiting both direct and indirect discrimination.
- Allow migrant workers to switch jobs and depart the country without requiring their employer's consent, guaranteeing that all migrant workers can change jobs without

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prior approval, penalties from their current employer, or jeopardising their right to reside and work in the UAE.

- Provide long-term migrant workers with the opportunity to apply for permanent residency and citizenship.
- Protect migrant workers from paying recruitment fees for their employment and initiate investigations and legal actions against employers and recruitment agencies that impose such fees on workers.
- Permit independent observers access to the UAE to monitor the human rights situation in the country, including with respect to migrant workers, and issue an open invitation to all United Nations Special Procedures so that independent UN experts can review the UAE's compliance with its international human rights obligations.

#### Heat stress and other occupational health and safety risks

- Amend climate-related outdoor working hour bans to reflect real-time temperature, humidity and workload for all outdoor worksites.
- Safeguard workers from extreme heat exposure by enacting legislation that mandates employers grant workers breaks of appropriate duration in cooled, shaded areas when occupational heat stress is a potential hazard. These mandatory break times should consider both environmental heat stress risks and the physical demands of the job.
- Mandate that employers provide workers with easy access to water and refrigerated food storage facilities at work sites, along with fully air-conditioned accommodation and work rest areas.
- Ensure that migrant workers are comprehensively informed about these regulations and receive adequate training.
- Ensure that essential healthcare services for low-income migrant workers are provided free of charge, regardless of their immigration status or possession of identity documents.

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- Establish well-resourced clinics and emergency rooms near areas with significant populations of low-paid migrant labourers.

#### Freedom of association and collective bargaining

- Pass legislation recognising workers' right to freely associate, organise, bargain and form a trade union in line with international labour conventions.
- Ratify the International Labour Organization Conventions on Freedom of Association and the Right to Organize (No.87) and the Right to Organize and Collective Bargaining (No.98), as well as the 2014 Protocol to the Forced Labour Convention (No.29).

#### Forced labour

- Respect and take action to uphold migrant workers' right to freely change jobs without prior permission or penalties
- Proactively investigate indicators of forced labour and punish with criminal sanctions where appropriate. All breaches of the labour laws and the sanctions imposed should be published on a regular basis and be made publicly available.

#### Access to justice

- Publicly release labour complaint information through an independent and impartial mechanism.
- Ensure that those seeking redress through the Ministry of Human Resources and Emiratization (MOHRE) or the labour courts can access independent and professional advice and representation.
- Establish and enforce a whistle-blower protection law in line with international human rights law and standards.
- Bring to justice individuals and organisations responsible for the exploitation of migrant workers in line with international human rights standards.

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- Publish data on the number of people using the complaints procedures on a regular basis and make this publicly available. This information should be provided for cases addressed through both mediation and the labour courts and include the nature of the grievance and the outcome of the process.
- Take urgent action to ensure that all people in the UAE have equal enjoyment of their human rights, including the right to freedom of peaceful assembly and to freedom of association, and freedom from persecution, discrimination or exploitation.

#### Migrant worker country of origin states

- Enhance and enforce existing protections against deception, coercion, fraud and other forms of exploitation with respect to the recruitment of migrant workers.
- Enact and enforce prohibitions on the charging of fees to workers in their recruitment to the UAE, in line with and other international standards.
- Prosecute individuals and business within jurisdiction responsible for recruitment-related and other exploitation of migrant workers.
- Provide effective and adequate consular, social and labour claim support to migrant worker nationals subjected to exploitation in the UAE.
- Work with the UAE authorities, business and civil society to investigate complaints of labour exploitation and establish effective mechanisms for workers to safely lodge complaints from the UAE and when they have returned to their country of origin and obtain remedies and rehabilitative support.

#### Businesses in the United Arab Emirates

- Publicly commit to respecting human rights and labour rights and put in place adequate and transparent mechanisms to identify and prevent abuses due to business activities across the business and in supply chains.

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- Review business practices and policies to ensure that the company does not commit or materially assist in the commission of acts that lead to human rights or labour rights abuses.
- Require full disclosure from all partners, clients and suppliers, and publish a list of all contractors, suppliers and companies in value chains.
- Seek expert guidance, including that of civil society, to embed the United Nations Guiding Principles on Business and Human Rights (UNGPs) and other relevant international standards across business activities.
- Ensure workers can exercise their right to freedom of association, right to organise, engage in collective bargaining and collective representation, and freedom of speech.
- Actively develop and encourage industry bodies that seek to advance and implement international standards on business and human rights, including but not limited to protections for whistle-blowing and human rights defenders.

#### International Businesses and Investors in the United Arab Emirates

- Divest from projects and partnerships where partners in the UAE fail to address human and labour rights abuses including the practices documented in this report.
- Develop and implement policies and practices on business and human rights in line with the UNGPs and other relevant international standards that partners and contractors in the United Arab Emirates must respect as a legal requirement for doing business with you.
- Share specialist knowledge and expertise on business and human rights with counterparts and partners in the United Arab Emirates, including but with respect to the elimination of all forms of racial, gender, sexuality and other forms of discrimination.
- Seek expert guidance, including that of civil society, on how to identify, prevent and mitigate human rights risks due to business activities in the United Arab Emirates.

#### UN Framework Convention on Climate Change Secretariat

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- Ensure that at future COP summits there is a set of human rights and climate-related criteria that countries must fulfil to be appointed to the COP Presidency including respecting international human and labour rights and working towards the rapid, just phase-out of fossil fuels.
- Investigate all the instances of human and labour rights abuse documented in this report and ensure all victims can access justice and remedies and work with the UAE authorities to ensure those responsible face criminal and civil penalties as appropriate.

Appendix I: Full Text of Equidem Correspondence with Siemens and Expo City Dubai

#### Correspondence with Siemens Energy

- Response from Compliance Officer received on 13 November 2023; 5:28 PM GMT

Dear Mr. Qadri,

Thank you for bringing this matter to our attention. Siemens Energy takes all allegations of labor exploitation and human rights abuse very seriously, and we appreciate the opportunity to respond to your findings.

As a company, we are committed to upholding the highest standards of ethical conduct, including the protection of human rights and the prevention of labor exploitation. Our Code of Conduct for Suppliers (Copy enclosed for your reference) outlines our expectations for our business partners, and we take any violations of these standards very seriously.

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In addition, our human rights policy statement (Copy enclosed for your reference) clearly states our commitment to upholding the human rights of all individuals affected by our operations. We would like to conduct a comprehensive assessment of the situation and are looking forward to collaborate with you to address the concerns that have been raised.

However, we require the names of the subcontractors allegedly retained by Siemens Energy to take the potentially necessary remedial action(s). Once we have this information, we will take appropriate measures to ensure that the rights of migrant workers are protected within our operations in the United Arab Emirates.

Thank you for your cooperation, and we look forward to hearing from you soon.

- Reply from Equidem – 13 November 2023 6:46 PM GMT

Dear [Sir],

We have documented cases involving workers who said they were directly employed by Siemens Energy in the UAE and others who said they were employed by subcontractors on behalf of Siemens Energy. We note that you have not yet answered our questions, which do not require any further information from us. Specifically:

- Is Siemens Energy aware of any of the complaints made by workers set out below or other complaints of a similar nature?
- If so, what measures have been taken to remedy these practices and sanction individuals or entities responsible for them?

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Sincerely,

Equidem Team

- Response from Compliance Officer received on 14 November 2023; 1:34 AM GMT

Dear Mr. Qadri

As I am sure you understand, we cannot know whether we are aware of the specific complaints made by the workers in your report because we do not have their identities. To the extent we are aware of complaints of a similar nature as those alleged in your report, including whether and what remedial actions may have been taken in response thereto, would be information that is privileged and/or confidential and, accordingly, we are not able to comment further.

Please allow me to reiterate that, as a company, Siemens Energy is committed to upholding the highest standards of ethical conduct, including the protection of human rights and the prevention of labor exploitation. Once we receive the requested additional information from you, we will take appropriate measures to ensure that the rights of migrant workers are protected within our operations in the United Arab Emirates.

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Kemp House, 160 City Road,  
London, EC1V 2NX, United Kingdom

[www.equidem.org](http://www.equidem.org)



Correspondence with Expo City Dubai

- Response from Vice President Assurance - HSE & Worker Welfare: Expo City Dubai, Received on Mon 13 November 2023; 5:03 PM GMT

To:

Equidem

Dear Mr. Qadri,

I acknowledge receipt of your letter.

I wonder if there is a page missing. In it, you request we “assist the workers and investigate the companies named in the cases attached to the bottom of this letter”. Yet the only company mentioned by name is Siemens Energy.

Will you please share details of the companies and, where possible, the workers, in order for us to fully investigate and rectify any issues. As you are aware from your previous dealings with our Worker Welfare team, we have robust policies and procedures in place specifically to handle such cases. If the workers are not comfortable providing their names, they are encouraged to call the hotline (800 WORKER) in order for their complaints to be addressed. As a user of the hotline acknowledges on page 12 of your letter, “those [issues] that I have had were dealt with effectively”.

I look forward to receiving these details from you.

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- Equidem Response, 13 November 2023:

Dear [Sir],

Unfortunately we cannot share the names of other companies as the workers interviewed did not consent to publicly disclosing that information or for other reasons as we were concerned about the individuals facing reprisals for speaking to us, a significant risk in the UAE. We have provided information regarding workers in your supply chain and would be grateful for your response in relation to our findings, along with the specific questions raised in our letter of November 10th, 2023.

Sincerely,

Equidem Team

- Response from Vice President Assurance - HSE & Worker Welfare: Expo City Dubai, Received on Wed 15 November 2023; 5:03 PM GMT

Dear Mr Qadri,

Since 2020 when Equidem first contacted Expo 2020, we have asked you on numerous occasions – both in writing and during several phone calls with yourself and your team – for further details so we

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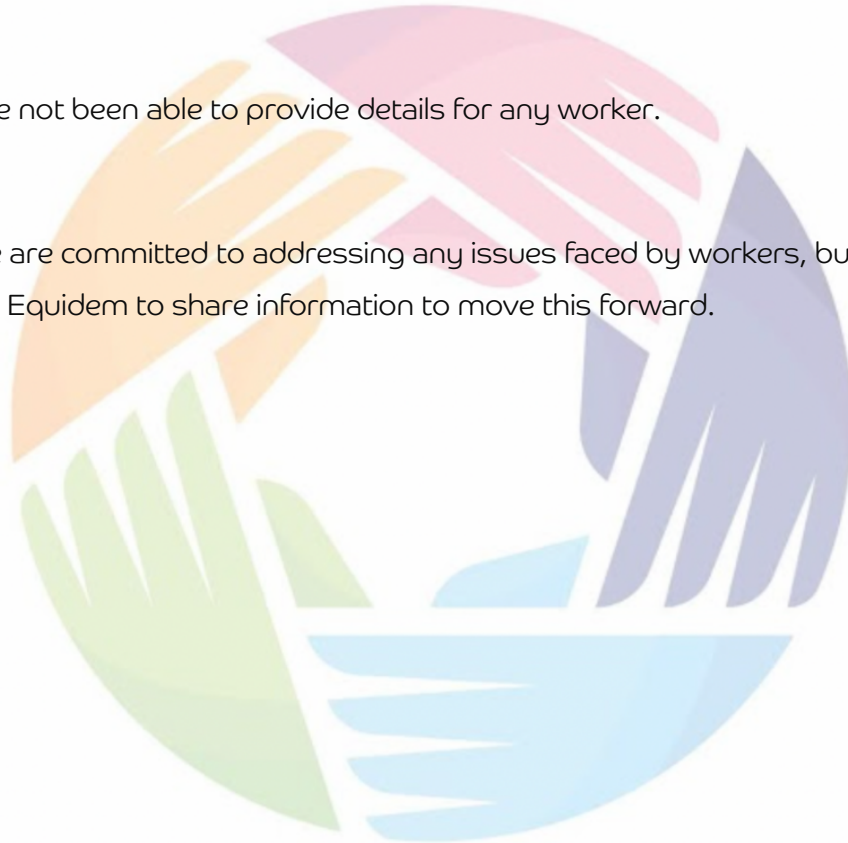




could investigate your claims. We have committed in writing to rectify any issues in line with our Worker Welfare policy. We have asked if the workers would permit Equidem to share their details with us, and requested Equidem remind them of the option of getting in touch via our Worker Hotline or through our Worker Connect app if they would feel more comfortable doing so.

To date, you have not been able to provide details for any worker.

I reiterate that we are committed to addressing any issues faced by workers, but for this to be possible we need Equidem to share information to move this forward.



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