

Via email to [info@equidem.org](mailto:info@equidem.org):

**Equidem**

**Global Labor Justice – International Labor Rights Forum**

26 August 2022

To whom it may concern:

Thank you for your letter regarding the research that Equidem and Global Labor Justice – International Labor Rights Forum (GLJ-ILRF) carried out between February 2020 and June 2022 regarding working conditions for migrant workers employed at hotels ahead of the FIFA World Cup Qatar 2022.

We note that you have explained that due to a technical error on your side we were not originally contacted as part of your outreach to hospitality companies as mentioned in your research. However, on becoming aware of your report we reached out to you to obtain further information and are now in progress of carrying out a review into the matters raised in your research.

At IHG Hotels & Resorts, we are committed to conducting business responsibly, including respecting labour and human rights. We take all reports concerning labour and human rights issues within our hotels and supply chains seriously and are committed to ongoing human rights due diligence. As a global leader in the hospitality and tourism sector, we strongly believe that we have an opportunity to affect positive change, which includes the advancement of human rights through our business activities. In line with this, we are reviewing all of the items identified in your report.

We note the following regarding our policies and approach to the risk areas identified in the locations covered in your research. In addition, we have provided information on our review so far into the specific concerns raised although noting that in some cases this is still in progress.

*Covid impacts:*

The global Covid-19 pandemic created unprecedented circumstances for the hospitality industry. Travel around the world significantly slowed or, in many places stopped, which led to a number of



IHG-branded hotels closing temporarily or significantly reducing operations. This in turn had a corresponding impact on the employment of colleagues. The closures and reduced operations led to some redundancies, although colleagues have been and continue to be re-hired as travels returns and hotel operations are scaled up again.

Redundancies were carried out in accordance with local labour laws. In a number of hotels, employees who were made redundant opted to remain in staff living accommodation with free food and medical assistance until they found new employment and/or decided to return to their home countries. Where employees decided to return home, hotels funded the cost of repatriation. Hotels also supported the re-deployment of former hotel employees into other work opportunities. To preserve as many jobs as possible, in some locations, a number of employees entered into unpaid leave agreements for limited periods of time as an alternative to redundancy. These employees continued to be provided with accommodation, meals and medical assistance during their periods of unpaid leave and continued to be paid in accordance with the number of days they worked, including any applicable overtime.

Hotels follow IHG guidance on health and safety measures related to Covid-19, as well as local government guidance. IHG's global Covid safety guidance covers topics including cleaning and disinfecting procedures, use of Covid-19 protective equipment, and Covid-19 infection control hotel risk assessment and procedures. Guidance was also applied to staff living accommodation, and examples of changes undertaken during the pandemic include regular deep-cleaning and disinfection of staff living accommodation in accordance with enhanced Covid-19 protocols; segregation of any suspected cases; facilitation of social distancing; reduced seating capacity and use of floor markers in common areas; limits on shuttle bus capacity; and increased communication and awareness to workers such as posters, notices and staff forums.

#### *Discrimination and Harassment:*

IHG does not tolerate any form of discrimination, harassment or bullying in the workplace, whether it be from a colleague, guest or anyone else. Employees are encouraged to report any concerns to supervisors or hotel management so they can be addressed, and IHG maintains a confidential reporting hotline where employees can report any such concerns. Our Code of Conduct and training sets out our expectation for managers to create an environment where colleagues feel able to raise issues and concerns and to always follow up when these are raised. Where concerns are raised, they are promptly investigated.

IHG is also committed to providing equality of opportunity without discrimination. Hotels follow the local labour laws and in addition IHG pay/salary tools, which are developed using external benchmarking and annual salary survey information, are used to help set salary levels for different roles.

#### *Recruitment fees:*

Our human rights policy clearly sets out that no worker should pay for a job and that fees and costs associated with obtaining employment should not be paid by workers. We have guidance and training for hotels on this topic, including covering carrying out interviews with workers to help check if fees or costs have been paid during the recruitment process. We continue to develop policies, processes

and requirements for hotels to help better understand and address this risk area. This ongoing work includes due diligence to understand where potential issues may occur as well obtaining input from external organisations to better understand the recruitment journeys of migrant workers and the types of fees and costs they may incur to help continually improve and update our guidance and training for hotels.

*Overtime:*

All IHG-branded hotels are required to comply with applicable laws and regulations regarding compensation and overtime.

*Labour providers:*

IHG's Supplier Code of Conduct sets out our expectations for suppliers including related to human and labour rights. Suppliers are required to comply with all applicable laws and regulations including those concerning hours, compensation, opportunity and working conditions. Where concerns are identified, we aim to work with suppliers to resolve any issues, however material breaches may lead to termination of the contract with the supplier. Hotels are provided with guidance and training on carrying out due diligence on labour providers.

*Reporting concerns:*

As noted above, we encourage colleagues to report any concerns or issues directly to their line manager, supervisor, local Human Resources representative or to another appropriate local manager. However, for certain matters, we recognise colleagues may feel more comfortable raising matters confidentially to IHG and in these instances, a confidential report can be filed through the IHG Confidential Reporting Hotline. This is an independent, confidential channel via the telephone or internet which can be used by our colleagues and any person with a relationship to IHG, including suppliers and their workers, to speak up and report concerns anonymously in their native language.

IHG does not permit retaliation against employees or workers employed by contractors making good faith reports of suspected breaches of the IHG Code of Conduct or IHG policies, even if it may result in a loss of business to IHG. We raise awareness of the confidential reporting line via our Code of Conduct and training, and hotels also raise awareness of the reporting line via posters on notice boards, during meetings/ briefings, etc. Further details on how to access the Confidential Reporting Hotline can be found at: <http://www.ihgethics.com/>

As explained above our review is still in progress however, below we have provided responses to a number of the items mentioned in your letter to us based on our review so far.

*InterContinental Hotel, West Bay, Doha, Qatar:*

As noted above we have clear policies that workers should not pay recruitment fees. We have requested further information from you to help identify whether the allegation concerns a particular company to enable us to investigate this further. With respect to the concern regarding harassment from guests, we are pleased that your research found that colleagues felt comfortable to report incidents to supervisors and that these were addressed. We understand this is an important issue and will continue to assess possible additional measures and resources.

*Crowne Plaza, The Business Park, Doha, Qatar:*

As noted above we have clear policies that workers should not pay recruitment fees. We have requested further information from you to help identify whether the allegation concerns a particular company to enable us to investigate this further. Regarding unpaid leave during the pandemic, as described above, in order to preserve as many jobs as possible, a number of employees entered into unpaid leave agreements for limited periods of time, proportionate to departmental business needs. Employees' pay continued proportionate to the hours worked, including any applicable overtime and accommodation, meals and medical assistance continued to be provided.

*Crowne Plaza West Bay, Doha, Qatar:*

We are sorry to hear that a colleague at this hotel did not feel comfortable reporting issues to their supervisors. While we encourage colleagues to report concerns to their supervisor or to local management or HR, we recognise that in some cases colleagues do not feel comfortable to do this. In these cases, concerns can be raised to IHG via our confidential hotline described above and this can be done anonymously. We continue to assess how to ensure colleagues are aware of the hotline and do this in various ways including displaying posters and through training.

*InterContinental Dubai – Festival City, UAE:*

Regarding the concern raised related to housing, we have requested further information from you regarding the provider of the accommodation to enable us to investigate this concern further.

As stated above, we take all reports concerning labour and human rights issues within our hotels and supply chains seriously, and we encourage third parties, including media channels, civil society organisations and others, to contact us directly with any concerns, either via our confidential reporting channel ([ihgethics.com](https://ihgethics.com)) or via the Ethics and Compliance team's email address ([ethicsandcompliance@ihg.com](mailto:ethicsandcompliance@ihg.com)).

For more information on our approach to labour and human rights risks please see our Modern Slavery Statement which includes information on our work in this area including collaborative projects we have engaged on. Our Modern Slavery Statement can be found here: [IHG Modern Slavery Statement](#)

We appreciate Equidem's raising these issues with us directly. We take seriously our commitment to operating responsibly and respecting human rights, and are continuing to review and address as appropriate the identified issues.

Kind regards,

**IHG Hotels & Resorts**