

Date: 08 November 2022
Our ref. Q11017-0100D-EDM-CON-LTR-00001



Tel No.: [REDACTED]

Email ID: [REDACTED]

Attention: Mr. Mustafa Qadri – Chief Executive Officer, Equidem

Project: Al Bayt Stadium Al Khor City– (Stadium, Auxiliary Building & Bridge) Package 2, Part 1 & Part 2 (SP/C/1610/14) and Energy Centre- Package 4, Part 1 and Part 2 (SP/C/1612/14)

Subject: Violations of Migrant Workers' Labour and Human Rights at Salini Impregilo

Dear Sir,

We write in reference to your letter dated 24th October 2022 (“**Your Letter**”), which was addressed to Salini Impregilo S.p.A (renamed Webuild S.p.A), regarding the above subject.

Together, Galfar Al Misnad W.L.L, Salini Impregilo S.p.A (renamed Webuild S.p.A) and Cimolai S.p.A constitute the Galfar Al Misnad W.L.L - Salini Impregilo S.p.A - Cimolai S.p.A Joint Venture (“**GSIC-JV**”). We know that Galfar Al Misnad received a similar communication from your side and We presume that the other Partner of the GSIC-JV also received one. We will therefore generally refer to such communications as (“**Your Letters**”). As a joint venture, we respectfully request that you please address the joint venture and not its individual entities, which cannot individually speak for the GSIC-JV without the participation and agreement of all partners.

As you are likely aware, in 2015, GSIC-JV was appointed by Aspire Foundation (“**Aspire**”) to be the main contractor for the construction of the Al Bayt Stadium (the “**Al Bayt Stadium Project**”) in Al Khor, a city about 50 km North of the capital Doha.

Your Letters state that Equidem has come across workers employed by our JV that you believe are being subjected to labour exploitation. We take the statements made in Your Letter regarding our workers very seriously and respond for and on behalf of the GSIC-JV Partners as follows.

A Joint Venture operating as:
Galfar Al Misnad – Salini Impregilo –Cimolai–JV



The Al Bayt Stadium Project is a mega multi-million dollar construction project, and it involves a complex matrix of Main Contractors, more than 150 separate sub-subcontractors, and by extension, several thousands of direct and indirect workers, as well as numerous independent entities, which GSIC-JV does not contractually or directly control, supervise, manage, pay or oversee.

Nonetheless, GSIC-JV takes great pride in its role as the main contractor on the Al Bayt Stadium Project and uses its best efforts and all leverage at its disposal to ensure that all its workers and subcontractors' workers associated with the Al Bayt Stadium Project are treated humanely, with dignity and respect, and are paid their full wages on time, without delay and in accordance with Qatari legal requirements, as well as international labour and human rights standards. We outline below some of the policies and practices we have adopted on the project to protect workers' rights.

Although GSIC-JV does not customarily share project-related information with third parties unless necessary, we will on this occasion share some information with Equidem, given the circumstances, in a good faith effort to address and alleviate the concerns raised in Your Letters, and to demonstrate our commitment to protect and uphold the safety, welfare and payment rights of the workers involved in the Al Bayt Stadium Project.

1. Compliance with Workers' Welfare Standards:

GSIC-JV uses its best efforts and all leverage at its disposal to ensure that all its contractors and subcontractors on the Al Bayt Stadium Project comply with and adhere to the requirements of the Supreme Committee (the "**Supreme Committee**") for Delivery and Legacy's Workers' Welfare Standards ("**Workers' Welfare Standards**"), which cover health and safety, employment, working and living conditions, the provision of grievance mechanisms and other issues, and which include the obligation to pay workers, procure required residency permits and health cards and prohibit charging workers recruitment fees. GSIC-JV believes these objectives are not only essential and mandatory, but also crucial to the protection of workers' rights and the fostering of a safe, efficient and productive work environment.

In fact, we can confirm that the Qatar 2022 Workers' Welfare Standards Edition II are being adopted on this Project and are committed to adhere to various employee treatment standards including, amongst other things, fostering a healthy and safe work environment, protection of dignity, compliance with labour standards, maintaining acceptable living conditions, avoid excess working hours, payment of wages on time and prohibiting retaliation against workers for expressing grievances.

The above high standards are evident in the accommodation and living conditions that GSIC-JV have provided to our workers at the **Al Bayt Village Camp Accommodation**, the quality of which are of far above the industry norms.

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2. Ensuring Full and Timely Payment of Salaries and Wages:

As you are likely aware, the Qatar Labour Law requires all employers, including GSIC-JV (directly or through the Partners), to pay all employees in Qatar through the automated Wage Protection System (“WPS”) in order to ensure that all workers in Qatar are paid their salaries (including severances, or Final Settlement as called in the Middle East Countries) through an electronic salary transfer on time and without delay.

The WPS enables the Ministry of Labour to continuously monitor and track salary and final settlement payments and to thereby ensure the timely and full payment of salaries/severances and compliance with the provisions of the Qatar Labour Law. The WPS also assists the judiciary in issuing judgments and settling labour disputes concerning employee payments and entitlements. Knowing that salary payments to workers are being tracked and monitored forces employers to pay their employees and workers on time and without delay, absent exceptional circumstances.

3. Compliance with Health and Safety Guidelines:

GSIC-JV prides itself on having an extremely efficient HSE Management Plan in place to look after the necessary welfare and hygiene requirements of all staff and workers on the Al Bayt Stadium Project in accordance with Qatar 2022 Workers Welfare Standards Revision 2.

In line with the GSIC-JV HSE Management Plan and following Qatar Ministerial guidelines, GSIC-JV has employed all necessary safety measures to ensure that the health of all workers employed on the stadium have not been at risk during the period Covid 19 pandemic.

4. Ethical Treatment of all Workers:

GSIC-JV has employed multiple nationalities during the construction of the Al Bayt Stadium, all of which have been treated the same without any discrimination to race, religion or ethnicity. GSIC-JV has adopted a strict Code of Ethics policy which ensures that all are treated without any discrimination and provided equal work opportunities based on professional qualifications and performance.

Additionally, GSIC-JV promotes the advancement and career promotion of our staff and workers as can be evidenced by some of our people who have been with the company for several years. Employer change and release of No-Objection Certificate as well as Employment Certificate are also integral part of the JV Policy to ensure a fair and reasonable treatment of all employees who wish to transfer to any other Company.

5. Workers' Grievance Mechanisms:

As part of our efforts to protect workers' rights, we continuously inform workers that they can anonymously report grievances. To that end, we display flyers on various notice boards, which includes a Toll-free Workers' Grievance Hotline telephone number, and which is publicized in more than one language to be readily accessible to workers.

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The flyer informs workers that: *"All grievances are anonymous and will be handled efficiently and confidentially by a member of the Supreme Committee for Delivery & Legacy. You can also reach out to your Workers' Welfare Officer or elected Workers' Representative, and ask them to raise your complaint during a Workers' Welfare Forum."*

GSIC-JV therefore used its best efforts to keep workers informed and appraised of how they can express any grievances or concerns, anonymously or through a representative, and which agencies they can approach to seek redress for their grievances without fear of reprisal.

6. GSIC-JV's Position:

GSIC-JV has indeed used its best efforts to ensure that it fully comply with the Workers' Welfare Standards and, in particular, with their obligations to pay all workers involved in the Al Bayt Stadium Project on time and without delay.

Besides being constantly monitored by our Employer, the Supreme Committee and various other Ministerial Departments, we are constantly monitoring our compliance with the Workers' Welfare Standards and their contractual obligations, and as noted above, we also put grievance mechanisms in place in order to provide a platform that enables workers to express grievances without fear of reprisal, and to address such grievances.

We therefore strongly reject any allegations contain in Your Letters and We trust that the above is responsive to the concerns raised in Your Letters. We also wish to point out that Webuild is only involved in the Design and Construction of the Al Bayt Stadium Project and that Webuild S.p.A. has no involvement in the Khalifa International and Al Rayyan Stadiums, as wrongly mentioned in Table 3 of the Report.

Finally, we respectfully note that any use of the information contained in this letter that is inaccurate, misleading, taken out of context and/or which may defame GSIC-JV and/or harm its reputation will be considered to be actionable. We respectfully reserve our legal rights in this respect.

For and on behalf of GSIC-JV.

Yours faithfully,
GSIC Joint Venture

For and on behalf of Galfar Al Misnad:

Mr. Hemachandran

For and on behalf of Webuild S.p.A:

Mr. Leonardo Blanda