

## HUMAN RIGHTS WATCH

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September 28, 2020

Mr. Wissam Khalaf  
Executive Director  
Imperial Trading and Contracting Company L.L.C  
Doha, Qatar

Dear Mr. Khalaf,

I am writing to you with regards to the issue of migrant workers' salaries in Qatar, including those employed by Imperial Trading and Contracting Company L.L.C (ITCC). We wish to inquire about steps that ITCC has taken or will take to address workers' rights in Qatar in consistent with companies' responsibility to respect human rights, including labor rights, under the UN Guiding Principles on Business and Human Rights.

Human Rights Watch is an independent, nongovernmental organization that monitors and reports on human rights in more than 90 countries worldwide. We have been monitoring the human rights of migrant workers in the Middle East, particularly in the Gulf states, for many years. In previous reports we have documented widespread abuse of migrant workers' rights arising from restrictive immigration policies, exorbitant migration and recruitment fees, a lack of legal protections in countries of employment, and inadequate enforcement of those protections that do exist. We have urged reform of government policies and practices that enable workers' rights abuses in these countries and have likewise called for private actors to ensure that they uphold and respect workers' rights.

In August 2020, Human Rights Watch published a report on companies and employers' failure to pay migrant workers on time and in full. This is a problem which often heads the list of workers' grievances in Qatar. We have found a variety of instances of wage issues that include delayed and unpaid salaries, lack of overtime payment for workers for

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over 8 hours of work duty, arbitrary deductions, and failing to pay gratuity upon the workers' departure.

We are aware that unpaid and delayed wages for migrant workers, especially in the construction industry, are partly driven by delayed payments from entities higher up in the often-long supply chains to subsidiary contractors, a phenomenon exacerbated by an economic downturn and the absence of legislation to promote prompt payment.

We understand through your website that some of your recent and current projects include construction for the Qatar Olympic Committee, ASHGAL, Katara Commercial Plaza and Children's Mall and residential villas across Doha, Qatar. We interviewed 6 employees working for ITCC who said that they did not receive wages in full or on time.

Interviewees said that at least 480 ITCC employees have not received regular and timely salaries or food, rent, and petrol allowances. ITCC employees told Human Rights Watch that have not been paid their monthly wages for up to 10 months; for some employees, the most recent monthly salary they received was for October 2019, others have been paid up till December 2019. We have reviewed memos sent by ITCC management to employees through 2020, asking them to keep working despite the delayed and unpaid salaries.

Employees have also reported receiving delayed salaries throughout 2018 and 2019. Employees also told Human Rights Watch about 150 ITCC employees who resigned in March 2019 but have not yet received their end-of-service benefits, payment in lieu of vacation days, and tickets to home country. ITCC employees said they are only paid for 8 hours of work a day, despite them putting in at least 10 hours of work a day.

We would appreciate your response to the following questions, as well as any additional information you wish to provide.

1. Could the company explain the circumstances that led to late payments to ITCC workers through 2018 and 2019, and could it elaborate on the reasons behind the current 10-month delay in payments?
2. How many employees currently have not received all the payments they are owed to date?
3. How many employees have filed formal complaints and how has the company responded?

4. Has the Wage Protection System helped flag the delayed and unpaid wages to the government? Has the government made efforts to address the problem of delayed and unpaid wages?
5. Could ITCC elaborate on how it addressed delays in workers' salaries from 2018 through 2019?
6. Could ITCC provide information on how many staffers and workers are facing delayed and unpaid salaries as of September 2020?
7. Could you outline the overtime payment policy for ITCC staffers?
8. Could ITCC provide details about its human rights policies and procedures that apply to its workers?
9. What factors lead to delays in payment? For example, is ITCC being paid in a timely manner from clients? Could ITCC provide its payment policies?

We would welcome an acknowledgement of this letter and your reply by September 28, 2020, in order to reflect ITCC's position on these important issues. Thank you for your attention to this matter. We are happy to receive your answers to the above questions by email. We are also happy to discuss over the phone or in person if that is your preference. Should you have any questions relating to this matter, you can reach my colleague Maham Javaid by email at [REDACTED] or by phone at [REDACTED].

Sincerely,

Michael Page  
Deputy Director  
Middle East and North Africa  
Human Rights Watch

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Mr. Israr Ahmed, Operations Manager, Gallopers Group,  
Mr. Gorfu Sitotaw, General Manager, Lalibela Cleaning &  
Services

[Redacted]  
Via e-mail: [Redacted]

Dear Mr. Ahmed,

I am writing to you with regards to the issue of migrant workers' salaries in Qatar, including those employed by Gallopers Group, the parent company of Lalibela Cleaning & Services (Lalibela). We wish to inquire about steps that Lalibela has taken or will take to address workers' rights in Qatar consistent with companies' responsibility to respect human rights, including labor rights, under the UN Guiding Principles on Business and Human Rights.

Human Rights Watch is an independent, nongovernmental organization that monitors and reports on human rights in more than 90 countries worldwide. We have been monitoring the human rights of migrant workers in the Middle East, particularly in the Gulf states, for many years. In previous reports we have documented widespread abuse of migrant workers' rights arising from restrictive immigration policies, exorbitant migration and recruitment fees, a lack of legal protections in countries of employment, and inadequate enforcement of those protections that do exist. We have urged reform of government policies and practices that enable workers' rights abuses in these countries and have likewise called for private actors to ensure that they uphold and respect workers' rights.

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In August 2020, Human Rights Watch published a report on companies and employers' failure to pay migrant workers on time and in full. This is a problem which often heads the list of workers' grievances in Qatar. We have found a variety of instances of wage issues that include delayed and unpaid salaries, lack of overtime payment for workers for over 8 hours of work duty, arbitrary deductions, and failing to pay gratuity upon the workers' departure.

We are aware that unpaid and delayed wages for migrant workers, especially in the construction industry, are partly driven by delayed payments from entities higher up in the often-long supply chains to subsidiary contractors, a phenomenon exacerbated by an economic downturn and the absence of legislation to promote prompt payment.

We understand through your website that Gallopers Group has various companies including Lalibela Cleaning & Services, Global Car Wash, and Roxy Contracting, providing cleaning and laundry services in Qatar.

We have written to your previously on June 19, 2020, regarding three workers who raised concerns about underpayments, delay of monthly wages, and a lack of end-of-service benefits and residence permits among other concerns detailed below. In September 2020, we interviewed three more Lalibela employees who have raised concerns about delayed and unpaid salaries.

Interviewees said that at least 10 Lalibela employees have not received regular and timely salaries or food allowances. Lalibela employees told Human Rights Watch that they have not been paid their monthly wages for four months, since June 2020; they also reported not having electricity in their company-provided accommodations.

Moreover, they reported not having received Qatar identity cards, health cards or ATM cards, despite having been employed by Lalibela since 2019. The employees we spoke to said they are only paid for 8 hours of work a day, despite them putting in at least 10 hours of work a day.

We would appreciate your response to the following questions, as well as any additional information you wish to provide.

1. Could the company explain the circumstances that led to late payments to Lalibela workers since May 2020, and could it elaborate on the reasons behind the current 4-month delay in payments?
2. How many employees have filed formal complaints and how has the company responded?
3. Is Lalibela registered with the Wage Protection System? If not, has the company attempted but failed to register?
4. Could Lalibela provide information on how many staffers and workers are facing delayed and unpaid salaries as of September 2020?
5. Could you outline the overtime payment policy for Lalibela staffers?
6. Could Lalibela provide details about its human rights policies and procedures that apply to its workers?
7. What factors lead to delays in payment? For example, is Lalibela being paid in a timely manner from clients? Could Lalibela provide its payment policies?

We would welcome an acknowledgement of this letter and your reply by September 28, 2020, in order to reflect Lalibela's position on these important issues. Thank you for your attention to this matter. We are happy to receive your answers to the above questions by email. We are also happy to discuss over the phone or in person if that is your preference. Should you have any questions relating to this matter, you can reach my colleague Maham Javaid by email at [REDACTED] or by phone at [REDACTED].

Sincerely,

Michael Page  
Deputy Director  
Middle East and North Africa  
Human Rights Watch

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October 16, 2020

**HE Yousuf Mohamed Al Othman Fakhroo**  
Minister of Administrative Development, Labour and  
Social Affairs,  
Ministry of Administrative Development, Labour and Social Affairs,  
Doha, Qatar

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Nabeel Rajab  
Vicki Riskin  
Charles Shamas  
Sussan Tahmasebi  
Christophe Tanghe

Via Email: [REDACTED]

**Re: Wage Abuses**

Your Excellency,

I write to express our appreciation for your government’s engagement with Human Rights Watch and to inquire further about widespread and longstanding wage abuse at two Qatar-based companies.

Human Rights Watch has promoted workers’ rights around the world for more than 20 years, including across the Gulf countries. As you will know, Human Rights Watch issued a report in August 2020 on workers’ right to fair and timely wages in Qatar in which we discuss how reforms introduced to tackle wage abuse have largely failed and look into the larger framework in Qatar that enables wage abuse.

We welcome Qatar’s recently introduced reforms, under the agreement with the International Labor Organization (ILO) that establish a non-discriminatory minimum wage for migrant workers and make it possible for them to change employers without employer permission before the end of their contracts.

In our previous communication with you on September 28, we brought to your attention the widescale delayed and unpaid wages at Imperial

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Trading and Contracting Company L.L.C and Lalibela Cleaning & Services.

Since then we have received updates that at least 400 workers at ITCC are still working without pay, the last month for which they received payment is October 2019 in some cases and November 2019 in other. A group of 50 workers was put on 'long leave' in August 2020 without being given their pending salaries or end-of-service benefits. And a group of 19 ITCC workers that resigned in June 2019 due to delayed payments are still waiting for their pending salaries and end-of-service benefits. It has been reported that ITCC managers are convincing this group of 19 workers to accept 30 per cent of their pending salaries and return to their home countries.

Human Rights Watch has also learned that ITCC's aggrieved workers submitted a complaint regarding their delayed wages to MADLSA on June 28, 2020. It has been reported that this complaint was not followed up on and concluded despite the Labor Dispute Resolution Committee's policy of passing verdicts on cases within 6 weeks.

Employees at Lalibela have also reported to Human Rights Watch that since our last letter to your Ministry and the Government Communications Office, on September 28, 2020, their situation has remained unchanged. It has now been 5 months since they received their monthly wages. Since September 2020, the company has not provided their accommodations with electricity. The company provides them with QR150 for food and water in an irregular and arbitrary manner.

Human Rights Watch is committed to fair and accurate reporting and seeks to understand the perspectives of the Qatari government. We have attached questions we have concerning government policies and actions, particularly what measures the Ministry of Administrative Development, Labour and Social Affairs (MADLSA) has taken – or will take – to prevent alleged wage abuse at ITCC and Lalibela and to make sure workers are fairly compensated.

We would be grateful for a written response to our questions in as complete a manner as possible by October 22, 2020 so that it can be reflected in our reporting.

Please reach out to my colleague Maham Javaid by email at [REDACTED] who will answer any questions you may have, and receive responses to the attached questions.

Thank you for your time and attention to this letter.

Sincerely,

Michael Page  
Deputy Director  
Middle East and North Africa Division  
Human Rights Watch

**Questions relating to Imperial Trading and Contracting Company L.L.C.'s alleged wage abuses against migrant workers in Qatar**

1. Has the ministry visited ITCC offices since September 28, 2020 to investigate the allegations of wage abuse? If yes, what has the ministry found upon these visits?
2. What actions have been taken since September 28 to provide the aggrieved workers with their pending salaries?
3. Did the investigations reveal that ITCC workers reported their grievances to the labor court on June 28, 2020?
4. If so, is the Ministry investigating how that complaint was followed up on?
5. Is ITCC registered with MADLSA's Wage Protection System (WPS)?
6. If ITCC is registered, has the WPS flagged any possible issues? If so:
  - a. What was the nature of the issues WPS flagged and when did it first flag them?
  - b. What actions if any have been taken to address the situation?
  - c. If MADLSA became aware of alleged unpaid wages at ITCC, did it investigate the underlying causes? If so, did it identify as the employer as the problem, or a breakdown in the supply chain, or another reason altogether?
  - d. Did the WPS detect that, prior to October 2019, workers were receiving delayed payments and did not receive payment for overtime worked?
7. If ITCC is not registered with the WPS, why has the company been able to work without registration?
8. What steps if any does MADLSA intend to take to ensure that workers receive any delayed wages, overtime payments, and end-of-service benefits?
9. When workers are paid any delayed and overtime payments, will these payments be made from the Workers' Support and Insurance Fund?

10. How will MADLSA ensure that any penalties imposed on the owner of ITCC and the company do not adversely impact the employees of ITCC who are still living in company accommodations, working at ITCC, and waiting for payments?

**Questions relating to Lalibela Cleaning & Services' alleged wage abuses against migrant workers in Qatar**

1. Has the ministry visited Lalibela offices and accommodations since September 28, 2020 to investigate the allegations of wage abuse?
2. What has the ministry found upon these visits?
3. What actions have been taken since September 28 to provide the aggrieved workers with their pending salaries?
4. Is Lalibela Cleaning & Services registered with MADLSA's Wage Protection System (WPS)? If so, has the WPS determined that Lalibela committed wage abuse? When did the WPS first become aware of Lalibela's alleged wage abuse?
5. If MADLSA has been aware of delayed and unpaid wages and below satisfactory living conditions, what actions have been taken to remedy the situation?
6. Has MADLSA successfully investigated the cause behind the alleged delayed and unpaid wages? Is the cause an employer, a breakdown in the supply chain, or another reason altogether?
7. Before June 2020, when workers were allegedly receiving delayed payments without their overtime payments, was the WPS able to detect that workers were not receiving overtime payments?
8. If Lalibela is not registered with the WPS, why is it that the company has been able to work without registration despite it being mandatory for a company of its size?
9. What steps if any does MADLSA intend to take to ensure that the workers receive any delayed wages, identity cards, health cards, overtime payments, end-of-service benefits, and passports?
10. When workers are paid any delayed and overtime payments, will these payments be made from the Workers' Support and Insurance Fund?
11. How will MADLSA ensure that any penalties imposed on the owner of Lalibela and the company itself do not adversely impact the employees of Lalibela who are still receiving timely payments?