

Date: 02<sup>nd</sup> May 2023

Dear Mr. Stephen Cockburn,

Greetings!

We are hereby responding to your letter dated 6<sup>th</sup> April 2023 that “Teyseer Security Services” have abused and violated the migrant labors rights during their employment with us during FIFA world cup, 2022.

We would like to express our deep concern regarding the allegations that have been brought to our attention. We are appalled at the allegations, and we take every one of them very seriously.

We want to make it clear that our company has a zero-tolerance policy towards any form of harassment or discrimination, and we are committed to providing a safe and inclusive workplace for all employees. We believe that every employee (either on a long term or on a short term) should be treated with respect and dignity, and any behavior that falls short of this standard will not be tolerated. This is our code of conduct principles and in which we operate on.

We are herewith responding to your questions and the allegations raised by the employees that have been laid out in your letter:

1. **What policies and procedures does Teyseer have in place to identify, prevent, mitigate, and account for how it addresses labour abuses of the type alleged by workers in the annex during the World Cup?**

Our ethical principles are of Loyalty, Transparency, Respect for People, and Business Integrity.

And in regard to Ethical Recruitment, Teyseer Security Services is one of the first companies to adopt a policy banning the charging of recruitment fees to migrant workers. In this regard, we have stringent policies and recruitment agency service agreements to recruit workers from overseas to adopt ethical recruitment practices, including carrying out due diligence on the recruitment agencies they hire across all their supply chain.

Teyseer Security Services set out to review our Welfare Standards to forbid these unethical practices. Our HR policy stipulates that a worker is not to be charged any Recruitment or Processing Fees including any upfront deposits or security-payments for the provision of recruitment services, at any time.

To stand by our cause, TSS emphasizes and ensures by various risk-mitigation checklists are affirmed and religiously followed right through the entire process – from job advertisements placed by the recruitment agents until the workers onboarding process into our Company is entirely complete.

Our commitment towards recruiting the right people for the right security jobs with nil recruitment fees helps to create strong working relationships between the staff and management.

We have our recruitment agencies’ contracts penned in ways that all the aforementioned points are captured, and fair practices are followed and adhered to.

2. Please describe how Teyseer monitored compliance with Qatari law and international labour standards during the World Cup. What measures, such as inspections, did the company take to identify the type of labour abuses outlined in this letter, specifically regarding (a) payment of unlawful recruitment fees and related costs (b) inadequate overtime pay, (c) denial of promised bonus, (d) lack of weekly day off? If such inspections were undertaken, how often did they happen during the World Cup, who carried them out and what had been the results and actions taken? Are the results of these inspections made public? If so, where? If they are not public, would you be willing to share the results with Amnesty International?

- A) Payment of unlawful recruitment fees and related costs:

We strictly follow ethical recruitment processes & standards, and all our agencies abide by them. We have developed a company policy designed to protect and respect workers' rights and freedom and ensure that the policy is communicated & implemented appropriately.

We engaged ethical recruitment agencies for our employment needs by conducting research on the agencies our company uses.

We had recruited the FIFA project employees of about 2500 from countries like – India, Nepal, Kenya, and Ghana. We had informed the candidates of our recruitment process in advance to set their expectations, also ensure all the details of the role are shared with the candidates in advance through advertisements, briefing before and during the interview process, etc.

During the hiring process in each country, we have had a big banner capturing all nuances regarding ethical recruitment and also our Teyseer representatives explained all candidates about nature of the roles, safety aspects and the working and living conditions in Qatar, and explicitly informed that they are not required to pay any Recruitment or Processing / Service Fees, etc. to agents or to any third parties.

All candidates were treated fairly, all through the recruitment steps, we had clearly communicated, emphasized on zero recruiting fees.

This was also captured in our offer letters for their ready reference during their acknowledgement of offer acceptance.

We had also organized HR & Welfare induction upon their arrival and this question regarding the fees was also asked and none came up claiming so.

- In connection with the expenses paid by the employees, we confirm that the candidates only paid a certain amount for obtaining attested police clearance certificates from MOFA (as it was employees' scope to avail themselves of their good conduct certificates). All other expenses were fully borne by our Company.

- B) Inadequate overtime pay:

- Every employee was paid the appropriate amount for the hours worked over and above the regular working hours as per the labor laws or the employment contract. We know it is important to comply with the labor laws related to overtime pay and also it is their right to wages, hence we always ensure that our employees are fairly compensated for their work.

- All Teyseer security officers deployed in FIFA projects were paid as per their contractual / offer basis and there was no unfair / bias / discrimination treatment in regard to wages. All wages were made as per stipulated Wage Protection System (WPS) in the state of Qatar irrespective of nationality, ethnic or religious factors.
- C) Denial of promised bonus:
  - Please be informed that the claim is nonspecific, not true and is not based on facts. There was no mention of any bonus in the employment contract. They have had a preconceived notion about bonuses that differs from the contract that they signed at their time of acceptance. When a few of the employees enquired about this, we from our side communicated clearly with the employees to clarify any misconceptions about it and ensured that everyone was on the same page.
  - All short-term employees were paid in full with overtime and other allowances for complete three months even though they worked only during FIFA match (33) days, according to the law they should be paid only with basic salary for non-working days, however we paid them over and above the offer and bonuses were not part of this discussion.

(D) Lack of weekly day off?

- We provide weekly day off to employees as it is their entitlement, a legal requirement and also provide them with a break from work and time to rest. And in this context, all our employees were by default granted weekly rest days.

Maintained Open Lines of Communication:

We have had our teams (comprising Quality Inspectors, PMs, other relevant department) available in each accommodation to assist and meet the needs of our employees. We put in more communication channels and strategically put plans in motion to ensure all staff are apprised on every detail.

Our management team also regularly visited the accommodations and at the sites met all the staff to meet and greet our employees to ascertain their wellbeing. We also explained and cleared their queries regarding their short-term employment contingents. The communication processes commenced since the staff landed in Qatar (thru inductions, all hands meet, one-one meetings, etc.) and all queries / concerns were heard upon and actioned.

Contract Conditions:

We would like to express our sincere disappointment about the subject of deception in our recruitment, this claim is completely false and unacceptable. Under no circumstances, we provided wrong commitment about their employment. All were thoroughly informed that they will be employed by “Teyseer Security Services” only for a short period (up to three months) and not directly work with FIFA. Job-specific conditions, rules and requirements surrounding the employee's responsibilities, wages and benefits were described, and only upon their consent to these conditions, they were hired.

Ethical business practices are the core company values of our company. All recruitment dealings were carried out on a conscious commitment to fairness, treating all employees equally.

All employees were explicitly informed about:

- This contract is with Teyseer Security Services and that they will be working specifically only for FIFA projects.
- The short-term contract is for up to three months. This special visa was granted by MOI with three months validity and hence Teyseer emphasized that there will be not an extension of their contract (to permanent positions) upon completing their short-term contract, this was captured in the offer letter as well.
- Wages will be paid as per their position in the contract, and it was clearly mentioned during the interviews and in the job advertisements.
- The working hours are 10 hours / day for six days with one day off in a week in line with Qatar Labor Law (with two additional hours payment).
- An experience certificate will be provided upon completion of their employment.

Working Condition Allegations:

We did not have any projects in Al Khor as mentioned in your letter. Teyseer deployed guards were only working in Central Doha (areas – Corniche, AL Bidda Park, Souq Waqif, Doha port) for 10 hours a day (wherein some areas the working hours were reduced from ten to eight hours per shift). The maximum hours that they worked was only 10 hours including 1 hour and 45 minutes break in their shift.

The shift handover / take over was also part of ten hours, and it takes minimum of 30 minutes to a maximum of 45 minutes of travel from their sites to the accommodations.

All were adequately provided with two water bottles of 1.5 litre and hot meals (through coupon system) and they had their break for 15 minutes per two hours in addition to the 45-minute lunch & dinner break on a daily basis.

In connection with the trainings, all officers were provided on the job training by the client project team, in addition to it, online portal trainings were also provided. One of the project's officers were trained in their home countries about their respective roles, assessment was made by the concerned projects authorities and only then they were approved for deployment.

Crowd management was not our scope of operations and none of our officers were exposed to safety risks as indicated in the letter. Also, please be informed that the weather conditions during the FIFA World Cup was very amiable, calm, and pleasant with low temperature. All our officers were provided with proper PPE to weather any unforeseen conditions (if any).

We assure you that all our employees were given the utmost care in maintaining legal working hours, safe and healthy working environments, access to sufficient breaks, snacks, meals (according to nationality) with beverage during their shifts at designated places. Sufficient supervision was in place by implementing, monitoring their well-being, and allowing them to accommodate the needs of individual guards. Our goal was to ensure that our employees' work experience with our company is as seamless and stress-free during their employment with us. All the above was also rigorously invigilated by the clients' representatives on a day-to-day basis.

#### Employee Engagement:

Taking care of our employee well-being is an essential aspect of our day-to-day business and our employee welfare programs typically go beyond the basic requirements of Qatar labor laws and regulations and focus on providing additional benefits and services that contribute to the well-being of employees.

We made it a priority to keep all our employees engaged by providing them work-life balance facilities, program comprising social and recreation activities – seahline trips, fun events, motivational gifts, staff parties etc. All employees resided in a first class accommodation with complete welfare and recreation facilities with highest standards.

#### Legal Abidance:

As a Company, we respect and follow labor laws and human rights in order to create a safe and fair work environment for our employees, by complying, we respect and promote human rights, including ethical recruitment, wage laws maximum working hours, and workplace / accommodation safety standards.

We have been continuously audited by various governing bodies like Supreme Committee, Qatar Foundations, IMPACTT – UK (on behalf of Supreme Committee) etc. Our principles levels are tracked and measured through employee’s survey, regular Ethical Recruitment and Accommodation standards audit, interviewing employees, etc. And time again, we have proven and built a good relationship with our customers.

We would like to apprise Amnesty International that we have been (& are) fair with all our employees in all our welfare standards as it is our fundamental belief that a positive and productive work environment can be created by prioritizing compliance with labor laws and human rights. And, we have never strayed in our Company’s ethical principles and code of conduct.

“Teyseer Security Services” firmly believe that ethical behavior is a crucial component of a business's success and employee trust and accordingly we follow and adhere to ethical practices with zero compromises. And herewith in conclusion, we have presented our explanations in full transparency and honesty and wherefore, we request Amnesty not to print / publish any information related to us without our consent.

Best Regards.

**Teyseer Security Services**  
Doha – Qatar

Date: 31<sup>st</sup> May 2023

Dear Mr. Stephen Cockburn,

We would like to acknowledge receipt of your letter dated 18th May 2023. At the outset, we reiterate the responses we provided as per our reply dated 4<sup>th</sup> May 2023 which cover most of the points related to the allegations raised by the workers.

We, without prejudice to the aforesaid, herewith state our response to the additional allegations raised in your above letter.

**1. Recruitment Fees and related costs, training in home countries:**

As previously informed, Teyseer Security covered all recruitment expenses except for the police clearance certificates. Covid-19 tests were conducted for all employees at the Company's expense upon arrival in Qatar. Medical fitness expenses were included in the recruitment cost, and there was no charge levied upon for the candidates.

We reiterate that we have completely borne the cost of their recruitment process as part of our hiring policy. All selected candidates were informed to be cautious and vigilant when encountering any requests regarding payment during the recruitment process, and to contact our Company if they encounter such situations. We have made it very clear to all candidates before starting the interview and during the interview and also put a big banner in front of our interview room, highlighted in the offer letter and handbook, not to pay any single money.

We would like to reemphasize that we adhere to strict ethical recruitment policies, which stipulate that workers are not charged any recruitment or processing fees at any time. As such, we do not condone any agency that violates this policy.

The same was rechecked while they were in Qatar, and none claimed that they had paid. It is really surprising that a few numbers of erstwhile employees are now claiming so.

Teyseer representatives were in the hiring countries right through all recruitment stages, selection of guards until the completion of training (imparted by the clients). During the selection process itself all training related information including the daily allowance were well communicated, as mutually agreed with candidates, Teyseer has paid 40 USD per candidate for covering their transportation cost from training venue to home. All trainees were provided with snacks, lunch, stationaries, and other necessary requirements, etc. during the training days.

**2. Discrepancies in Job Roles and Salaries:**

This is a mere allegation from employees which is completely incorrect. Interviews and recruitment were conducted according to the required number from the client for each job category. As indicated earlier, our Company followed fair and transparent selections where there were no discrepancies in job roles and salaries. We had clearly communicated with all our employees about the pay structure, employments terms and conditions, and there was no commitment to promotions of category mentioned anywhere during this process.

We processed their visas only after they accepted and signed the offer letters. Please note that we have approval on categories of employment, and we will be able to recruit based on the categories only.

### **3. Unaddressed Complaints:**

This also is a mere allegation from employees which is completely incorrect . Teyseer has an escalation procedure in place for employees to address any grievances they may have. We take any allegations seriously and thoroughly inquire them to ensure that our commitment to these values remains firm. We also believe that a healthy work culture is created wherein all our employees feel comfortable expressing their concerns in a safe and supportive environment.

For your information, only a few complaints were raised through Supreme Committee’s workers hotline, and they were clearly addressed with rationalization, to quote a few who had failed in the MOI medical and repatriation to their own country. Also, our client representatives were available in our accommodation 24/7 to look after their grievances / complaints, barring a few complaints no work condition grievances were raised with them.

We are unsure of any other unaddressed complaints that have been raised by them as all the raised ones were addressed in a fair and unbiased manner.

We assure you that none of our managers in our company has threatened nor threatens an employee for raising grievances. For your kind information – World Cup Organizers visited our accommodation exclusively to ensure that all our facilities and amenities are of standards, and they were content with the positive environment provided.

### **RESPONSE TO INFORMATION PROVIDED BY TEYSEER**

#### **1. Recruitment Fees**

As mentioned earlier and as above, Teyseer Security covered all recruitment expenses except for the police clearance certificate. We strictly follow ethical recruitment policy and standards right through all stages.

#### **2. Excessive hours and lack of Weekly Day Off**

To restate, all our employees were treated with respect, providing fair working conditions, specifically adhering to working hour regulations as set out in the contracts, thereby ensuring a positive and productive work environment. We understand that a few might have disagreed and have voiced out their perceptions when approached by third parties but with due respect, we confirm that all workers’ health and safety at work was considered with no compromises. All were paid with proper overtime, given proper time off, sufficient training to handle the site / project operations.

Teyseer has paid over and above to compensate their employees by providing additional pay, including a full salary for those who joined at the end of October and middle of November. All employees received three months' complete salary, along with a special allowance and overtime allowance for each month for any days they did not work.

#### **3. Deception**

It is disheartening to hear that our company has deceived by making false commitments or promises regarding the conversion of short-term workers to permanent positions, or of bonus payment. As clearly indicated earlier, we believe in transparency and integrity in our hiring or employment practices. We have been honest from the beginning and since this project was for a defined period, we were very clear in setting out our employment

terms and conditions wherein no guarantees or promises were made. We would like to express our sincere disappointment in this allegation set forth.

#### **IN SUMMARY**

In addition to the agreed terms and conditions, TSS has provided additional benefits for the employees by enrolling group life insurance, private hospital for their health issue, free covid test, 24/7 medical care, Free SIM card with free international calling time, Free multi ethnicities food program, recreation facilities (Gym room, TV room, Gaming room), free internet service provided at their accommodation, welfare activities, gifts, and prizes etc.

At the end of their assignment, we received many requests from the workers to be employed by our company on a permanent basis and also large number of appreciations from them regarding on time payment of their salaries and welfare standards provided to them which shows their full satisfaction.

Fair Employment Practices, transparent communication, fair treatment are the principles that we work on, we assure you that we uphold these in all our work operations. We reaffirm and remain committed to upholding the highest standards of professionalism and ethical treatment of workers.

In regards to your clarifications, we have addressed all the concerns and questions presented by us dated 2<sup>nd</sup> May 2023. We provided comprehensive explanations, additional information and contents needed to address the issues related to operations, salaries, treatment of workers, etc.

Our responses were aimed to provide a clear understanding of our operations during the FIFA 2022.

We would like to inform you that the allegations raised by the erstwhile employees do not align with our Company's operations during the entire short-term project tenure. We have conducted our operations / business in line with the standards / legal requirements and in interactions with clients, stakeholders. All employees were treated with the highest standards of professionalism and ethical treatment.

We would like to clarify and inform that we indeed responded to all your queries that have been raised in your correspondence. We herewith request your kind office to refrain from publishing any information or articles that might not align with our reputation. We value your support, and we look forward to a continued positive guidance.

Thank you for your understanding and continued support, we trust that you will honor and consider our request.

Best Regards.

**Teyseer Security Services**  
**Doha – Qatar**





Stephen Cockburn  
Deputy Director, Head of Economic and Social  
Justice  
Amnesty International

Zurich, 5 June 2023

### **FIFA World Cup Qatar 2022™ and labour rights – Teyseer Security Services**

Dear Stephen,

Thank you for your letter dated 25 May 2023 with respect to FIFA's labour rights due diligence at the FIFA World Cup Qatar 2022™ and the situation of workers employed by Teyseer Security Services.

Let us first reiterate FIFA's firm commitment to human rights in line with FIFA's Human Rights Policy and responsibility under the UN Guiding Principles on Business and Human Rights. As you are aware, FIFA, in collaboration with its Qatari counterparts, implemented a far-reaching due diligence process with the aim to ensure that companies involved in FIFA World Cup-related construction and services abide by the Supreme Committee's Workers' Welfare Standards. We consider any non-compliance with these standards unacceptable and are actively following up when we learn about alleged breaches, using our leverage with third parties for the benefit of workers.

In that respect, FIFA has taken note of information on alleged abusive labour practices by the company Teyseer Security Services. Please find the below considerations in response to the questions raised in your letter.

#### **a) FIFA's due diligence for security workers operating at the FIFA World Cup Qatar 2022**

The due diligence process to identify and address labour rights risks associated with FIFA World Cup 2022-related security services was implemented in a joint effort with the Supreme Committee for Delivery & Legacy (SC). It included pre-contract due diligence, on-site audit and inspections in all stadiums and training sites during the tournament, as well as a compliance and enforcement arm in close collaboration with the Qatari Ministry of Labour. As part of that, FIFA provided the SC's Workers' Welfare Department a group of specialist auditors and FIFA's human rights team was directly involved in pre-contract due diligence and enforcement measures where a contractor was working based on a contract by FIFA or the FIFA World Cup Qatar 2022 LLC (Q22).

As for the specific area of recruitment fees about which you inquire in your letter, the SC Workers' Welfare Standards include a dedicated chapter on ethical recruitment that reiterates the prohibition under Qatari law of payment of recruitment and processing fees by workers. Contractors under contracts with FIFA, Q22 or the SC were required to use recruitment agencies that are approved and



certified by the Ministry of Labour and ensure that all fees are borne by the recruitment agents. To reinforce its commitment to tackle the systemic challenge of recruitment fees, the SC has created the so-called Universal Reimbursement Scheme, through which it encourages contractors to reimburse recruitment fees to their workers irrespective of whether workers can provide substantiating proofs of payment.

For more information on these processes and programmes, please refer to the information published on the FIFA World Cup Sustainability Strategy reporting page ([here](#)), the reports published by the SC and its independent monitor Impactt Ltd (see [here](#)), or previous letters FIFA had shared with Amnesty International on the topic. Furthermore, updated information will be published as part of the overall tournament reporting on sustainability matters in due course.

#### **b) Teyseer Security Services**

Teyseer Security Services supported the last mile operations during the FIFA World Cup as a host country contractor. When FIFA received Amnesty International's first letter with allegations from Teyseer workers on 19 April 2023, FIFA has promptly inquired about the situation with the SC's Worker Welfare Department (WWD) in line with the established procedures. FIFA also inquired about the situation and steps taken to address it with the Doha Office of the International Labour Organisation ILO.

Based on these exchanges, we would like to share the following summary information:

- Teyseer was subjected to the due diligence process for service workers operating at the FIFA World Cup. As such, their workers were required to be recruited from approved recruitment agencies. We were also informed that the workers were hired through contracts that were compliant with the requirements under the Workers' Welfare Standards and that the company bore the cost of recruitment in line with their explanations cited in your letter.
- It is our understanding that all workers received, at a minimum, three months' worth of basic salaries. We were informed that Teyseer paid for salaries for the full month of October, even if most workers only arrived in Doha on 10 October 2022 or later. As short time workers, the workers were not entitled to end of service benefits or additional salary due to annual leave, and FIFA is not aware of any specific FIFA World Cup bonus programme.
- The workers from Teyseer were housed in Labour City, which is considered compliant with the Workers' Welfare Standards. Food, uniform, laundry, and transportation were managed by the company itself. FIFA is aware that workers raised some concerns regarding the accommodation including with respect to food and has been informed that these concerns were addressed by the company with support of their own Workers' Welfare Officers.
- As you mention in your letter, the SC Workers' Welfare Department received several complaints from Teyseer workers through its hotline and worked to address these together with Teyseer management. This included independent as well as joint reviews of the situation to validate the concerns and find solutions where required. The respective cases were closed in the weeks after the tournament.

FIFA understands that there are different perceptions and views regarding some of the above points. We will continue to be in contact with the SC's Workers' Welfare Department and other relevant stakeholders to obtain more clarity on these questions. Furthermore, we are investigating about the circumstances around the pre-deployment trainings that are mentioned in your letter.

To conclude, and as a general comment, we would like to restate that FIFA has taken significant steps, in collaboration with its Qatari counterparts, to prevent and mitigate adverse impacts for workers involved in FIFA World Cup 2022-related activities. Whilst this programme is widely recognised to have ensured a heightened standard for FIFA World Cup workers and helped catalyse the labour reforms in the country, its delivery has not been without challenges. It is the primary responsibility of the respective companies as well as the Qatari authorities to rectify possible adverse impacts on workers. As FIFA, we work to use our leverage with the relevant entities to promote the provision of remedy when we become aware of such allegations, in line with our responsibilities under international standards.

In that respect, we would also like to mention that the FIFA Human Rights & Social Responsibility Sub-Committee has undertaken to conduct an independent assessment on access to remedy for workers in the context of the FIFA World Cup Qatar 2022. It will assess whether the steps FIFA has taken to date are in line with FIFA's human rights commitments and responsibilities under relevant international standards. The Sub-Committee has started this process and we look forward to being in touch with Amnesty International to discuss these questions further.

We would like to thank you again for your letter and remain at your disposal for further exchanges.

Kind regards,

