



AMNESTY INTERNATIONAL

Index: MDE 23/8582/2024

Carrefour Group and Majid Al Futtaim responses to Amnesty International correspondence regarding their human rights due diligence processes and allegations of labour abuses suffered by contracted workers in Carrefour facilities in Saudi Arabia.

Amnesty International conducted research into the treatment of migrant workers contracted to work in Carrefour stores and warehouses in Saudi Arabia. As part of the research, Amnesty International contacted Carrefour Group and its franchise partner, Majid Al Futtaim, on two occasions to seek details about human rights due diligence they had undertaken into their operations and third-party supply companies, and to share allegations of labour exploitation amongst its contracted migrant workers. Carrefour Group's responses dated 31 May and 30 August 2024, and Majid Al Futtaim's responses dated 13 June and 16 September 2024 are attached.



[REDACTED]
Executive Director of Engagement
Carrefour Group

[REDACTED]
Deputy Director, Head of Economic
Social and Justice Team
Amnesty International

31 May 2024

Dear [REDACTED]

You recently contacted Carrefour Group, and our CEO Mr Alexandre Bompard, to share your concerns regarding human rights protection and the situation of migrant workers in Saudi Arabia, where Carrefour franchise partner Majid Al Futtaim operates.

First of all, I would like to thank you for reaching out to Carrefour and for sharing with us the content of your research work in that field. I highly respect Amnesty International's fight for human rights promotion and I welcome this opportunity of dialogue. The protection of human rights is a challenge for which we must work collectively whether at local and international level. We already work with the FIDH, the CGF, the IFS or the CSSP and we welcome this occasion of dialogue with you.

Secondly, I hereby reaffirm that respect for human rights is a high concern for the group. It is both an issue of prime importance and a great challenge. Carrefour seeks to identify risks within its operations and throughout its supply chain, and strives to implement corrective measures and crisis management in case of alert related to human rights. Following your request, you will find below our answers to your questions regarding the specific situation of Saudi Arabia.

In the meantime, I invite you to consult our dedicated report on human rights, publicly available at the following address ["Respect for Human Rights"](#) and our ["Duty of Care"](#).

My team and I remain available should you have any other questions.

Yours sincerely,

[REDACTED]



1. How many people in total are currently working in Carrefour's franchise sites in Saudi Arabia?

a. How many of these are working in supermarkets or hypermarkets?

In the Kingdom of Saudi Arabia, the number of staff varies between 2000 and 3000 employees. 1000 to 1500 persons work in the stores.

b. How many of these are deployed to fulfillment centers or 'dark stores'?

Almost 500 persons are employed in dark stores.

c. How many of these are directly employed by Carrefour/its franchisee and how many are contracted workers supplied via third-party contracting companies?

A third of the workers - depending on business needs- are outsourced i.e. provided by our service providers.

d. Please could you provide a list of the third-party contracting companies supplying workers to Carrefour's franchise operations in Saudi Arabia ?

In the Kingdom of Saudi Arabia (KSA), MAF has two (2) external service providers: (1) Al Mutairi, and (2) Bodoor Najd Company BNC. These companies provide the company with staff to perform duties such as cleaning, security, and e-commerce fulfillment (pickers).

Both service providers have signed contracts containing provisions of compliance with the Employment Conditions Policy and the Supplier Code of Conduct as well as provisions pertaining to the Ethics Hotline.

Both service providers' contracts agreement clearly stipulate working hours, leave entitlement, break times, and compensation for overtime consistent with our policies. Both service providers have collaborated with previous audits and have taken measures to implement corrective actions to improve their state of compliance.

e. Can you please provide Amnesty International with copies of your franchise agreement with Majid Al Futtaim (MAF) Holding company in Saudi Arabia and specify whether this is Carrefour's standard franchise agreement and/or how this agreement may differ from agreements your company has with other franchisees in other countries insofar as human rights and/or sustainability concerns?

Carrefour is in the process of integrating a CSR appendix within Majid Al Futtaim's contract. This CSR appendix contains the purpose of the Carrefour Group and the commitment to implement policies and procedures to comply with due diligence. One section deals with the operation of complaints and alert mechanisms. Finally, the last sections present the CSR roadmap that Carrefour shares with its partners. This



roadmap lists a selection of sustainability priorities for Carrefour partners to implement. The implementation of these subjects is constantly monitored and studied during annual reviews. Please find [this appendix in attachment](#).

2. In addition to publicly available documents, please could you share further human rights-related policies or procedures that are relevant to Carrefour's franchise operations in Saudi Arabia, including the company's human rights risk assessment before engaging in business in Saudi Arabia and any ongoing assessments produced thereafter.

When signing new contracts in new territories, a compliance study of practices as well as support (training, recruitment, etc.) is carried out with the partners of Carrefour.

Carrefour Partenariat International has worked for more than 20 years with Majid Al Futtaim (MAF) who is committed to meet Carrefour's standard and expectation on human rights.

Within the aforementioned CSR appendix, Carrefour requires the following from its franchise partners : "Map human rights & health and safety risks and define a risk mitigation plan".

Majid Al Futtaim (MAF) has a company-wide comprehensive sustainability strategy focused around three pillars:

- 1) Rethinking Resources (environmental sustainability),
- 2) Transforming Lives (social sustainability aimed at external stakeholders), and
- 3) Empowering Our People (social sustainability aimed at our own employees).

One of the strategy's material focus areas, is Human Rights and Employment Conditions whereby the long term vision is to "Lead by example by requiring all employees and direct (tier 1) contractors to comply with the International Labour Organisation's eight core conventions" under which, there are three sustainable business commitments, namely:

1. Develop and implement a value chain human rights approach that encompasses risk-specific due diligence, standards and requirements for suppliers and partners, training & engagement, assessment and reporting
2. All Operating Companies, brand partners, tenants and first-tier suppliers to participate in or independently assess against the Corporate Human Rights Benchmark (CHRB) methodology and achieve a top-quartile score
3. All contractors and on-site suppliers, including staff accommodation, to adhere to ISO 45001 occupational health and safety management standard requirements and reduce the frequency rate of physical and mental H&S incidents among their employees

Find attached the published 2022 ESG Report which details MAF strategy [here](#).

MAF's sustainability strategy is enforced by several policies, including but not limited to the attached policies:

- 1- [Employment Conditions policy](#).
- 2- [Responsible Procurement policy](#).

The Employment Conditions policy of our partner MAF was established in 2019 and revised in October 2022. It was developed in accordance with international best practices, namely



the International Labour Organisation (ILO) Core Conventions and UN Global Compact Principles, and addresses topics like:

- child labour / forced labour,
- basic rights,
- remuneration,
- working hours,
- health and safety, and
- accommodation.

The Responsible Procurement Policy of MAF ensures that the supply chain abides by and incorporates all applicable codes of conduct and policies, including the Employment Conditions policy. The “Minimum Sustainability Requirements” of the policy, applicable to all Tier 1 suppliers, include socio-economic metrics such as human rights, occupational health and safety, anti-corruption and transparency, in addition to other environmental metrics on energy, water, and waste. The policy clearly states that Tier 1 suppliers (defined as the “top 100 spend suppliers based on the contract value or merchandize procurement value”) must adhere to all requirements.

You will also find in these links the [supplier code of conduct](#) and the [MAF Code of Conduct](#).

3. Who, at the global, regional and country management level, is responsible for assessing and monitoring of human rights risks and overall implementation of human rights policies and procedures in Carrefour's franchisee in Saudi Arabia, including throughout the whole value chain?

The Governance section of MAF's Employment Conditions policy outlines that the responsibility for the delivery of this policy and the associated processes and procedures rests with the MAF Holding Sustainability team, in collaboration with MAF Retail's Human Capital & Sustainability team, Risk and Compliance, and Health & Safety with oversight from the Board of Directors.

This policy is cascaded down to country level where local Human Capital & Sustainability leads as well as country Risk and Compliance team monitor implementation.

Given that suppliers and service providers play a determining role in MAF's activities, it is intrinsically important in the mutual interest of all parties to integrate them on the path to sustainable development by providing them with the means and enabling them to meet the highest standards that MAF strives to apply in its operations.

Towards that goal, MAF has taken measures to ensure that the Employment Conditions Policy extends beyond direct employees to apply to manpower hire of all direct service providers and contractors.

4. What due diligence steps does Carrefour take to ensure that its franchisee's business relationships such as with contractors and sub-contractors have an adequate human rights record and safeguards in place prior to engaging them to ensure that workers do not risk facing human rights abuses in the lead up to and while working with Carrefour and its franchises in Saudi Arabia?



Within Carrefour group, Carrefour Partenariat International (CPI) is responsible for ensuring that the franchised stores of international partners are committed to the food transition for all. This commitment is underpinned by the following levers :

- The Human Rights Charter signed by all the Group's international franchise partners: appended to the franchise partner contracts, the charter sets forth a number of social obligations. It describes the control methodology in place and specifies the existence of an Advisory Committee.
- The CSR appendix now included in all new contracts since 2022: by signing this appendix, each partner undertakes to define quantified and time-bound commitments aligned with the Carrefour group's CSR priorities.
- The annual strategic review: involving CPI and the CSR department, on the one hand, and franchise partner managers, on the other, the review enables strategic priorities to be defined with each partner.
- The franchise partner CSR manager network: through this network, the Group shares rules, best practices, innovative solutions, projects and concepts that franchisees can implement on a voluntary basis.

As answered in the second question, Majid Al Futtain undertakes that:

- All Operating Companies, brand partners, tenants and first-tier suppliers to participate in or independently assess against the Corporate Human Rights Benchmark (CHRB) methodology and achieve a top-quartile score
- All contractors and on-site suppliers, including staff accommodation, to adhere to ISO 45001 occupational health and safety management standard requirements and reduce the frequency rate of physical and mental H&S incidents among their employees

5. If/when Carrefour identifies risks or instances of human rights abuses in its franchisee's business relationships, what steps does the company take to mitigate and address such risks both prior to and once the supplier is engaged in Saudi Arabia?

Carrefour conducts risks analysis of its own and requires its partners to conduct more specific risk mapping, based on their specific knowledge of the context they operate in. CSR priorities are dealt with based on the Human Right Charter and as part of the annual review in place with each partner.

In addition to risk identification and mitigation, the 3rd requirement "Grievance and alert mechanism" of the CSR Appendix that will be include in MAF franchise contract states : "The Franchisee sets a grievance and alert mechanism to enable stakeholders to raise their concerns regarding non-compliance with social, environmental, competition and ethics rules. In case of media or stakeholders alerts, the Franchisee sets up an appropriate action plan to solve any non-compliance. The Franchisee informs Carrefour of the content of the media or stakeholder alert and the associated information within 24 hours, for the purpose of



Carrefour's own communication. The Franchisees and Carrefour will work together to develop an action plan."

6. What steps does Carrefour take to identify, prevent and mitigate risks or instances of labour abuses within its franchisee's operations in Saudi Arabia, including with regard to issues such as:

Please see answer in previous questions.

a) the recruitment process, including any fees and costs borne by migrant workers,

As indicated in MAF Employment Conditions Policy, the main terms of the employer and employee relationship, details of pay, leave, discipline, and grievance systems shall be freely agreed. Terms of employment shall be provided in a language understood by the employee. Where a third-party recruiter is used, all fees and expenses shall be covered by the employer and shall not be reclaimed from the employee at any time. All the answers to question 6 are taken from this MAF Employment Conditions Policy.

b) access to full information about where migrants will be working and under what conditions,

In accordance with MAF processes, the same conditions apply to migrant workers.

c) pay and overtime working terms and conditions,

In accordance with MAF processes, overtime should be voluntary and properly compensated for, according to local regulations.

d) working hours and adequate rest,

In accordance with MAF processes, employees shall not be required to work more than 48 hours per week, or the legal limit on regular working hours where the legal limit is lower, unless formally agreed.

In cases where overtime is agreed upon, it should be undertaken in line with the requirements set out in the Remuneration section.

- Employees are entitled to at least one day off in every seven-day period, or what is required by the respective country labour law.
- No employee will work more than 5 hours without a break. Where applicable, regional requirements in this regard shall be observed.

e) working conditions, including occupational health and safety risks,

In accordance with MAF processes, employees shall be provided with a safe work environment that employs best practices for health and safety measures.



Health and safety audits should be performed bi-annually at all operations and developments.

Employees are trained for emergency protocols, in accordance with local regulations:

- First-aid training must be performed by a certified third-party training provider:
 - Less than 250 employees: 1 first-aider
 - Between 250 to 500 employees: 2 first aiders
 - More than 500 employees: 3 first-aiders
- Fire safety training must be performed by a certified third-party training provider:
 - At least 2 fire wardens per floor/department/area
 - Bi-annual fire drill
- Awareness campaign sessions with the Health & Safety team

There must be a dedicated health and safety manager / risk & compliance manager to oversee the management of health and safety across all operations and developments where required.

f) living conditions, including access to adequate housing and basic services and at what cost.

In accordance with MAF processes, where employees are provided with accommodation, accommodation will be required to meet the requirements laid out in the Majid Al Futtaim Employee Conditions Audit Checklist (which is included with the supplier's contract) or local regulations, whichever is more stringent.

This is also applicable for both Majid Al Futtaim employees and the direct service providers providing services on-site (e.g., security personnel, cleaners, trolley-boys, contractors).

- Employee accommodation audits should be performed bi-annually at all accommodation sites. Those who fail these audits will be expected to rectify the required measures within 30 days or as per the timeframes constituted in the Governance section, depending on the non-compliance. Failure to do so may result in termination of contractor/supplier contracts, as a last resort.
- In the case that an accommodation allowance is provided, the allowance should cover the costs for an accommodation that meets the requirements set out in the Majid Al Futtaim Employee Conditions Audit Checklist.

7. What company operational-level grievance mechanisms are available for workers involved in Carrefour's business relationships to report labor concerns and/or abuses or their working and living conditions in Saudi Arabia, especially given that the country's labor system is out of line with international human rights law and standards? How are they made accessible with adequate information and in the workers' own languages? What measures and safeguards are in place to ensure that there is no retaliation against those who report issues to be addressed?

To encourage an open reporting culture, MAF Code of Conduct provides a mechanism and a tool available to employees and any other external party to report ethical concerns. Whistleblowing is done anonymously via the Navex Hotline available [here](#) or by raising the concern directly with management. Ethics hotline is available in Arabic, English, Georgian,



and Urdu languages. Posters about the Ethics Hotline are available in all MAF stores and can be easily seen by any third-party hire working for the company. The Risk & Compliance resources conduct continuous compliance training extended to both direct hire and external employees in the stores and online.

The Carrefour Group has also deployed an ethics alert system allowing employees or stakeholders who wish to do so to alert on situations or behaviors in contradiction with the Group's Ethical Principles available [here](#). This is available for franchise partners.

8. Have any current or former Carrefour workers (including workers contracted by its franchisee) ever raised concerns related to labor abuses and exploitation while working at Carrefour in Saudi Arabia? If so, what were the complaints, when did the incidents take place, when was the complaint made and to whom, what actions were taken to address the situation, what was the outcome, and who oversaw the implementation of remedies, if any? Please provide as much detail as possible.

On this previously mentioned alert line of Carrefour, 5,909 alerts were received in 2022 and the majority of these alerts were reported through local ethics alert lines (82.3%), the others being able to be escalated through hierarchical channels, by email or post. However, no alert has been received from Saudi Arabia.

9. Please describe how Carrefour monitors its franchisee's compliance with Saudi Arabia's laws, international human rights and labor law and standards, as well as Carrefour's own human rights policies and standards. What due diligence measures, such as periodic reporting, inspections, training on human rights due diligence, does the company take to identify and address elevated risks of labor abuses in Saudi Arabia?

a. If such reporting and/or inspections are undertaken, how often do they take place, who carries them out and what have been the results and actions taken?

b. Are the results of these reporting and/or inspection processes made public? If so, where? If they are not public, would you be willing to share the unredacted results with Amnesty International for the purposes of our research on the topic?

c. What other measures does Carrefour take to ensure its franchises are complying with human rights standards?

Regarding MAF's Employment Conditions policy :

It requires service providers and contractors to maintain accurate records of compliance and reserves MAF right to:

1. Conduct regular audits of health and safety, employee accommodation provisions, and documentation and records
2. Conduct interviews with a proportionate sample of the workforce
3. Conduct Staff accommodation audits bi-annually at a minimum.



MAF strives for continuous improvement of the process and to establish corrective action plans and a reaudit performed within 30 days. Failure to comply may result in a fine or warning letter to the supplier, and continuous failure may result in contract termination.

MAF efforts to enforce the policy include:

- Ensuring the policy is incorporated into all legal contracts as a binding document for both parties.
- Ensuring that contracts give us the right to conduct physical audits
- Ensuring that audits are conducted twice a year by MAF own Risk & Compliance independent staff or external auditors as the case may be, using the “Staff Accommodation Checklist” (Appendix 1 of the Employment Conditions policy) , and any non-compliance observed is addressed via action plans acknowledged by the service provider/contractor to improve their compliance score year-on-year.

Carrefour International Partnership holds bimonthly meetings, led by the CSR manager and the franchise advisor, with the Majid Al Futtaim CSR teams. This involves monitoring and taking stock of Carrefour Partenariat International's CSR roadmap, including a point on human rights as well as health and safety.

10. What steps, if any, has Carrefour taken, either on its own or in collaboration with relevant governments, companies (including contractors and subcontractors) or other stakeholders, to address the inherent risks of operating in an environment that presents elevated labor rights risks and address (including remediate) human rights abuses that it has become aware of? Can you please provide us with concrete examples from your franchised operations in Saudi Arabia.

Carrefour is involved in several multi-stakeholders platforms, seeking to improve social compliance and sustainability. As part of these initiatives, we can mention for instance the Initiative for Compliance and Sustainability, built to help suppliers share their compliance guarantees with retailers in a harmonised and efficient way. But setting common standards with its peers, Carrefour supports the adoption of common operating principles for the wider industry.

11. Considering that the ability of foreign nationals to change jobs or leave the country is tightly controlled by employers in Saudi Arabia - in breach of international law and standards - what steps does Carrefour take to ensure that those placed to work in the company's facilities do not face restrictions on their right to freedom of movement, and are able to change jobs and leave the country at will during and after their time working at the company?

In the light of the above, Carrefour takes very seriously the alert shared by Amnesty International. The preliminary findings presented within Amnesty International letter have immediately been shared with our partner MAF. Majid Al Futtaim has integrated these elements to its grievance process and has launched a comprehensive review to be conducted by the Head Office Risk & Compliance, Sustainability and Human Resources



team in order to gather the relevant facts that would help identify if any major deviations from our policies have occurred and to take adequate corrective measures.



[REDACTED]
Executive Director of Engagement
Carrefour Group

[REDACTED]
Director Climate, Economic and Social
Justice and Corporate Accountability
Amnesty International

August 30th 2024

Dear Madam [REDACTED]

You contacted Carrefour Group on May 15th to share an important alert on the human rights situation of migrant workers in Saudi Arabia, where Carrefour franchise partner Majid Al Futtaim operates. Following up on your first letter, Carrefour provided all the information available to complete your assessment of the situation you are investigating, in the interest of transparency. In your latest letter, dated August 16th, you informed Carrefour of your work's final steps and the upcoming publication of a report.

First of all, I would like to thank you for giving Carrefour the opportunity to discuss with you this sensitive subject. Indeed, human rights and worker protection are both a high-priority concern for the group and an important challenge.

Second, I would like to inform you that since your alert date of 15th of May, Carrefour has initiated an internal investigation, which is part of our alert mechanism. We have therefore initiated an assessment of the various findings you shared with us in collaboration with our partner MAF. As you know, this kind of investigation takes time when it comes to detecting any irregularities and rectifying them. This process is still ongoing and Carrefour and MAF are having a close dialogue on this matter.

Thirdly, considering the importance of the matter you raised, Carrefour has decided to commission an immediate third-party audit of the situation of migrant workers in the operation of its franchise partner in Saudi Arabia. Depending on the findings and potential non-compliance, we will implement relevant measures.

As part of this process, we would like to establish a constructive dialogue between our respective organizations. I therefore suggest a meeting with you, Amnesty International France, and myself in the coming weeks. My assistant [REDACTED] is available to organize this meeting.

Yours sincerely,

[REDACTED]

13 June 2024

[REDACTED]
Deputy Director, Head of Economic Social and Justice team
Amnesty International
1 Easton Street, London, WC1X0DW
United Kingdom
E-mail: [REDACTED]

Dear [REDACTED]

Re: Your letter to us dated 15 May 2024 with reference no. TC MDE 23/2024.5541 on Human Rights Concerns in Carrefour's Saudi Arabia Operations

We acknowledge receipt of the above-mentioned letter sharing your concerns and what you describe as preliminary findings on outsourced employees' conditions in Carrefour's Saudi Arabia operations.

In your letter, you requested for certain information related to our Carrefour operations in Saudi Arabia, which we will outline in this response to the extent that we are able to do so. It is important to note that our acknowledgement of your correspondence and our response to your request does not constitute any admission of liability or wrongdoing on our part, nor should it be construed as such. We also make no comment with regard to your statements on the legal framework in Saudi Arabia. As an organization we strive to meet high standards and thank you for bringing these matters to our attention.

Majid Al Futtain Group and its Commitment to Human Rights

Majid Al Futtain Group ("Majid Al Futtain") is an Emirati-owned, diversified lifestyle conglomerate operating across the Middle East, Africa and Asia. The organization employs over 43,000 people and has the highest credit rating (BBB) among privately held corporations in the region. Majid Al Futtain has owned the exclusive rights to operate Carrefour regionally since 1995, and currently operates Carrefour stores in 14 jurisdictions, including Saudi Arabia.

At Majid Al Futtain, we continually challenge ourselves to exceed international standards and think holistically about the impact our business has on the environment and the communities in which we operate. As such, we have a company-wide comprehensive sustainability strategy focused around three pillars:

1. Rethinking Resources;
2. Transforming Lives; and
3. Empowering Our People.

One of our strategy's material focus areas is Human Rights and Employment Conditions, whereby our long term vision is to "Lead by example by requiring all employees and direct (tier 1) contractors to comply with the International Labour Organization's eight core conventions", under which we have three sustainable business commitments, namely:

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majidalfuttain.com

Majid Al Futtain Holding LLC issued capital AED 2,670,729,000
Commercial registration number: 59383 - Dubai

الفاضة

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فاكس: +٩٧١ ٤ ٢٩٤ ٠٢١٧

ماجد الفطيم الفاضة ش.ذ.م.م رأس المال ٢,٦٧٠,٧٢٩,٠٠٠ درهم إماراتي
رقم السجل التجاري: ٥٩٣٨٣ - دبي

1. Develop and implement a value chain human rights approach that encompasses risk-specific due diligence, standards and requirements for suppliers and partners, training and engagement, assessment and reporting.
2. All Operating Companies, brand partners, tenants and first-tier suppliers to participate in or independently assess against the Corporate Human Rights Benchmark (CHRB) methodology and achieve a top-quartile score.
3. All contractors and on-site suppliers, including staff accommodation, to adhere to ISO 45001 occupational health and safety management standard requirements and reduce the frequency rate of physical and mental H&S incidents among their employees.

Majid Al Futtaim's sustainability strategy is enforced by several policies, including the Majid Al Futtaim Employment Conditions Policy and the Majid Al Futtaim Supplier Code of Conduct, as referred to in your letter. These policies have cascaded down to the country operational level where our local teams monitor implementation.

Given that our suppliers and service providers are instrumental to our business, it is inherently important to our mutual best interest to bring them with us on the sustainability journey by empowering them and enabling them to uphold the highest standards we strive to apply in our operations.

Towards that goal, we have taken measures to ensure that the Employment Conditions Policy extends beyond our direct employees to apply to manpower hire of all direct service providers and contractors. Our efforts to enforce the policy include:

- Incorporating the policy into all legal contracts as a binding document for both parties;
- Ensuring that our contracts give us the right to conduct physical audits; and
- Conducting audits twice a year by our own independent staff or external auditors as the case may be, using the "Staff Accommodation Checklist" (Appendix 1 of the Employment Conditions policy), and addressing any non-compliance via action plans acknowledged by the service provider/contractor to improve their compliance score year-on-year.

Carrefour's Operations in Saudi Arabia

In Saudi Arabia, the number of staff in our stores vary between 1,000 to 1,500 out of which a third of them, depending on business needs, are outsourced employees and almost 500 in our fulfilment centers.

The suppliers providing us with the outsourced employees have signed contracts containing provisions of compliance with our Employment Conditions Policy and the Supplier Code of Conduct, as well as provisions pertaining to the Ethics Hotline. The contracts also clearly stipulate working hours, leave entitlements, break times and compensation for overtime consistent with our policies. Furthermore, the suppliers have collaborated with previous audits and have taken measures to implement corrective actions to improve their state of compliance.

Finally, to encourage an open reporting culture, our Code of Conduct provides a mechanism and a tool available to our employees and any other external party to report any ethical concerns. Such whistleblowing can be done anonymously via the Ethics Hotline or by raising the concern directly with management. Our Code of Conduct also prohibits retaliation against anyone who shares a good-faith concern and considers any such retaliation as gross misconduct. The Ethics Hotline is available in Arabic, English and Urdu languages and posters about the Ethics Hotline are available in all our stores and corridors purposely visible to all employees, internal and outsourced. Additionally, our relevant team conducts continuous compliance trainings extended to both direct hire and external employees in the stores and online.

In light of the above, the details you list as preliminary findings in your letter in relation to Carrefour's operations in Saudi Arabia are of concern to us on many levels. As such, we wish to assure you that we have launched a comprehensive review to gather the relevant facts that would help identify if any major deviations from our policies have occurred and to take adequate corrective measures.

We would like to reiterate that Majid Al Futtaim strives in all its operations to comply with local laws, its own Code of Conduct, policies and procedures including the Employment Conditions Policy.

Please be advised that this response is not intended to be a full or exhaustive statement of our position. Nothing herein should be taken as a waiver of any of our rights and defenses, all of which are expressly reserved.

Sincerely,



Chief Executive Officer
Majid Al Futtaim Holding LLC

16 September 2024

██████████
Director – Climate, Economic and Social Justice, and Corporate Accountability
Amnesty International
1 Easton Street, London, WC1X0DW
United Kingdom
E-mail: ██████████

Dear ██████████

Re: Your letter to us dated 16 August 2024 with reference no. TC MDE 23/2024.5798 on Human Rights Concerns in Carrefour's Saudi Arabia Operations

I would like to take this opportunity to introduce myself. My name is ██████████ I recently joined Majid Al Futtaim Retail as CEO in mid-May. My intention is to build a trusting relationship with you and to ensure I am involved in relevant matters in a timely manner.

We wish to reiterate our gratitude to Amnesty International for raising this important matter to our attention and for sharing additional information in relation to human rights concerns in relation to our operations in the Kingdom of Saudi Arabia ("KSA") and specifically in relation to allegations related to treatment of migrant workers contracted to Majid Al Futtaim ("MAF") by third-party human resources companies, Abdullah Fahed Al Mutairi Support Service Co Ltd ("AFMCO" or "Al Mutairi") and Badoor Najed Contracting Company ("Badoor") (together, the "Contractors").

As stated in our letter dated 13 June 2024, MAF takes these allegations very seriously. We do not tolerate violations of our Code of Conduct, our Employment Conditions Policy or the MAF Supplier Code of Conduct ("our Policies"). We are dedicated to our sustainability strategy and its pillars (as laid out in our 13 June 2024 letter), including the focus on human rights and working conditions. We also seek to bring our third-party vendors with us on a journey of continuous improvement.

MAF Review and Remedial Action

We are committed to continuously improving our processes and internal controls to ensure healthy working conditions for both our direct employees and contracted workers. We are working to strengthen and improve protections for contracted workers who support our business in KSA. In recent months, MAF has taken a number of steps to review and seek to remediate the issues that you raised. In short, we have/are:

- Commenced a review of working conditions in our KSA facilities, including working conditions of contracted migrant workers of the Contractors.
- Conducted audits of the Contractors' staff accommodation against standards set out in our Employment Conditions Policy (in particular, the Staff Accommodation Checklist). We have worked with the Contractors to implement corrective action, where relevant (including working with the Contractors to improve accommodation and transferring some workers engaged by Al Mutairi to improved accommodation).

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majidalfuttaim.com

Majid Al Futtaim Holding LLC issued capital AED 2,670,729,000
Commercial registration number: 59383 - Dubai

الفايضة

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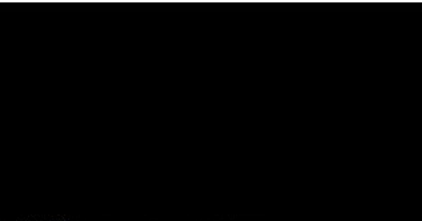
ماجد الفطيم الفايضة ش.ذ.م. رأس المال ٢,٦٧٠,٧٢٩,٠٠٠ درهم إماراتي
رقم السجل التجاري: ٥٩٣٨٣ - دبي

- Reviewing MAF policies and procedures with a view to strengthening and enhancing monitoring of key policies to ensure adherence to labour conditions, including in relation to overtime processes and prohibition of recruitment fees.
- Conducting work to strengthen our supplier due diligence measures, including use of third-party auditors to conduct audits of suppliers and increased screening for new suppliers.
- Broadening the reach of our human rights and employment training module to equip workers in KSA, including migrant contract workers with better understanding of our policies and their rights.
- Taking steps to improve access to our Ethics Hotline system, through which workers can report concerns.

This work is ongoing, and while we are progressing our review and remedial actions, we are committed to taking the necessary time and dedicating the necessary resources to handle these matters in a responsible way. We would welcome the opportunity to report back with further information about our remediation efforts in the months to come.

You will appreciate that any allegations that Majid Al Futtaim contributed to human rights abuses, forced labor and/or human trafficking are taken seriously; and we trust that any publication by Amnesty International on this matter will be fair, accurate, and thoroughly substantiated; and will take into account our policies and procedures, our sustainability standards, and our ongoing efforts as described above.

Please be advised that this response is not intended to be a full or exhaustive statement of our position. Nothing herein should be taken as a waiver of any of our rights and defenses, all of which are expressly reserved and any acknowledgement of your correspondences and our response to your request does not constitute any admission of liability or wrongdoing on our part, nor should it be construed as such.



Chief Executive Officer
Majid Al Futtaim Retail LLC