



**“NOBODY WANTS TO WORK  
IN THESE SITUATIONS”**

**A DECADE OF EXPLOITATION ON  
THE RIYADH METRO PROJECT**

**AMNESTY  
INTERNATIONAL**



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**Cover photo:** A worker on the construction site of the Saudi capital Riyadh's billion-dollar metro system, on August 26, 2015

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# 1. EXECUTIVE SUMMARY

For more than a decade, tens of thousands of migrant workers, many in low-wage jobs, have laboured in Riyadh's searing heat and dust, carving tunnels, laying tracks, and providing administrative and other support to consortiums of Saudi and international companies. Their labour – often unseen but indispensable – culminated in the opening of the Riyadh Metro in January 2025: 176 kilometres of track, 85 stations, and billions of dollars' worth of infrastructure. Hailed as the “backbone” of the capital's public transport system, the metro is set to carry millions of passengers each year and will be a cornerstone of Saudi Arabia's preparations for the 2034 FIFA Men's World Cup and other major international events.

This report tells the story of the working and living conditions of some of those migrant workers, and the state's failure to protect them from serious abuses. It is based primarily on interviews conducted remotely by Amnesty International with 38 men from Bangladesh, India and Nepal who worked on the Riyadh Metro project between 2014 and 2025, with most employed there until at least late 2023. It also draws on an analysis of the relevant national and international laws governing migrant workers in Saudi Arabia, and previous reporting from Amnesty International and other civil society organizations. Those interviewed were employed across a total of 11 companies – both Saudi- and internationally-headquartered – including some of the main contractors on the project, as well as certain subcontractors and labour supply companies. These companies are not named in this report, which focuses primarily on Saudi Arabia's state obligations.

## 1.1 THE METRO'S HIDDEN COSTS

The exploitation of these workers began before many had even left their home countries. Most interviewed for this report were already indebted – having paid between USD 700 and 3,500 in recruitment fees and associated costs to agents in their home countries. These payments often exceeded government-imposed limits multiple times over and were demanded of the men despite Saudi law prohibiting worker-borne recruitment fees. With families to support and few savings, some of the men borrowed money from banks or money lenders or sold family possessions to cover these costs. They saw this opportunity as their chance to escape poverty having been told by recruiters that decent work and pay awaited them in Saudi Arabia.

**“I paid 100,000 rupees (USD 700) to the manpower agent. But during the preparatory work – travel, medical tests, and other paperwork – I spent a total of 200,000 rupees (USD 1,400). I didn't have money with me at that time... I borrowed some gold from my wife's parents, sold it, and got some cash... As the price of gold increased, I paid [back] almost double for that. It took me six months to pay off the loans.”**

[Suman, Nepal]

Too often, these men only learned the truth about their employment after paying recruitment agents and setting off for Saudi Arabia. By the time they discovered the reality – that they would be working longer hours for lower pay, or that they were hired not by a construction contractor but by an intermediary labour supply company notorious for exploitation – it felt too late to turn back. For some, the burden of debt had already bound them before their journey began, leaving them acutely vulnerable to further exploitation.

That nearly all 38 interviewees, who worked on the project across different companies and times, reported being charged excessive and unlawful recruitment fees highlights a troubling pattern: both the companies and the governments took little to no effective action to prevent this exploitation.

Once in the country, low salaries were the most pressing concern raised by the workers interviewed by Amnesty International. Many were paid the equivalent of less than USD 2 per hour, while others earned barely half of that in their roles as labourers, cleaners and office assistants on the Riyadh Metro project. Virtually all worked 60+ hour weeks, toiling at least 10 hours per day, six days per week. While most of the workers said they were not directly forced to work overtime, the reality was that for most their basic salaries were just so low that they felt no option but to take on additional hours to earn enough to provide for their families.

**“Due to the inflation in Nepal, this salary is too little to pay for household expenses. It vanishes as I pay for my children’s education and other household expenses. But what could I do? I have to manage.”**

[Nabin, Nepal]

Saudi Arabia has no universal minimum wage policy but does set a SAR 4,000 (USD 1,066) monthly wage floor for Saudi citizens under its Nitaqat Program, which aims to increase Saudi participation in the private sector workforce. In practice, this programme establishes a de facto minimum wage for Saudi nationals, while non-citizens – most of whom are racialized migrant workers from Asia and Africa concentrated in low-paid, hazardous jobs – are excluded from this protection. Coupled with the kafala sponsorship system, this leaves them highly vulnerable to exploitation, with non-citizens often earning just a fraction of the average wages of Saudi nationals. This citizenship-based exclusion, combined with the lack of broader wage policy and the failure to guarantee salaries sufficient to ensure a decent standard of living, results in disproportionate harm to racialized migrant workers and amounts to racial discrimination under international law.

The long hours workers spent on the Riyadh Metro project were often intensified by the unrelenting heat of Saudi Arabia’s summers. Between June and August of both 2024 and 2025, for example, Riyadh stayed at 40°C or higher for more than 8 hours each day, often from around 11am until 7 or 8pm. Similar temperatures grip much of the country each year, as Saudi Arabia continues experiencing a rise in both the frequency and intensity of hot days – a trend projected to continue under global climate change. Although most interviewees said their employers largely abided by the government’s summer ban on outdoor work in direct sunlight during the midday hours, they also painted a picture of its shortcomings, particularly as heat and humidity can remain at startling levels beyond these hours and months. One construction worker likened the struggle of labouring in the sweltering hours outside the ban to being “in hell”.

Several interviewees recounted sweat-soaking their clothes, eyes stinging, vision blurring, and colleagues collapsing – either on site or later, while eating dinner in the workers’ canteen – all signs of the serious dangers of prolonged exposure to extreme heat. Some workers also described facing pressure from their superiors, who would prevent them from taking breaks, or penalizing those who did so without permission, in breach of government guidance on work in the heat.

**“When I work in the extreme heat, I feel like I’m in hell...Did I commit anything wrong so that God is punishing me?... What made me work in this environment? Nobody wants to work in these situations by their choice. But what can I do? I didn’t have a job in Nepal.”**

[Indra, Nepal]

Saudi Arabia’s laws and policies include important measures to safeguard workers from the harmful effects of prolonged heat exposure. However, by failing to take a risk-based approach, they remain inadequate to mitigate against the serious health risks faced by outdoor migrant workers. These shortcomings constitute a violation of the right to safe and healthy working conditions under international law and standards.

Finally, far from being a haven to relax in after their long working days developing the metro, several workers reported their employer-provided accommodation being overcrowded and dirty and said they were provided substandard food by their employers. The quality of the food depended on their seniority, they explained, with general labourers and junior staff given more basic meals of lower quality than their superiors, leading many interviewees to say they would sometimes use their paltry wages to supplement it: **“I found it disturbing. I felt bad,”** one Nepali worker said of this differential system, **“but what to do? ...I think workers should be able to access good food, regardless of their position of work.”**



↑ The King Abdullah Financial District station during construction in 2021.

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## 1.2 SAUDI ARABIA'S LABOUR SYSTEM

Compounding the exploitation of these men is the kafala sponsorship system, which governs Saudi Arabia's more than 13 million migrant workers. In recent years, the country has introduced limited reforms, however the system continues to grant employers excessive control over foreign workers' legal status, job mobility, and freedom to exit the country, creating deeply unequal power dynamics leaving them unable to challenge their treatment and highly vulnerable to abuse.

Among the legal and policy changes brought by the Saudi Ministry of Human Resources and Social Development (MHRSD) are the introduction of the ability for migrant workers, in theory, to request their own exit permits and, for most workers under certain conditions, to change jobs without employer consent. In practice, however these changes have been undermined by employers' continued control over workers' paperwork and personal documents, workers' limited access to information, and the persistence of retaliation tactics by employers such as arbitrary cancellation of residence permits, or malicious filing of 'absconding' reports.

Saudi Arabia has also introduced digital platforms designed to streamline administrative processes like visa issuance, work permits, and job transfers, but these have done little to address entrenched power imbalances. Additionally, in a recently updated 2022 regulation, the government replaced the ability of an employer to report an employee for 'absconding' – which is a key element of the kafala sponsorship system and often abused – with a 'discontinued from work' status for employees, which imposes some conditions on employers and gives workers with this status 60 days to find a new job or leave the country. However, employers still exert significant control over workers, and the government provides few statistics and little transparency, making assessing the true impact of these reforms exceptionally difficult.

According to MHRSD data, labour inspections across the private sector have more than doubled in the last five years. However, these inspections appear to have focused disproportionately on companies' compliance with the government's nationalization (Saudization) effort and the legality of migrant workers' employment status, rather than oversight of their working and living conditions. Additionally, since 2023, the Ministry has significantly reduced the amount companies could be fined for breaches of the labour law, including cutting the penalties for passport confiscation and denial of weekly rest time by more than two thirds. Moreover, the number and nature of penalties issued to violators remains unclear.

As a UN member state as well as a party to multiple UN treaties and ILO conventions, Saudi Arabia is obligated to uphold the human rights of all people within its territory. This includes guaranteeing the right to decent work with fair wages, protection from exploitation, and a safe and healthy working environment.

Under international law and standards, companies also have a responsibility to respect human rights and must conduct adequate human rights due diligence to enable them to identify, mitigate, address and remedy potential and actual human rights harms connected to their operations. Where risks cannot be adequately addressed, businesses should consider ceasing operations in the country.

## 1.3 CONCLUSION

This report exposes labour abuses in one of Saudi Arabia's key government-led infrastructure projects, built with leading Saudi and international firms at the helm.

Gaps in Saudi Arabia's legal framework, the government's piecemeal enforcement of existing laws, and the constraints of the enduring kafala system left migrant workers on the Riyadh Metro project at the mercy of their employers. Already burdened with exorbitant recruitment fees, they described working excessive hours for low and discriminatory wages to deliver the project over the last decade, their struggles exacerbated by exposure to extreme heat and inadequate living conditions.

Their experiences underscore not only the Saudi government's failings but also the significant human rights risks facing companies – including large multinationals – operating in Saudi Arabia's construction sector, which depends on a vast subcontracting network and operates in an environment where conducting effective due diligence is impeded by tight restrictions on freedom of expression and association.

As Saudi Arabia pushes ahead with more high-profile mega-projects and prepares to host the World Cup in 2034, this report should serve as an urgent warning of the need for stronger safeguards and accountability for the millions of migrant workers on whom these projects and events depend. Without decisive action, workers remain exposed to serious exploitation, and companies to reputational, legal, and financial consequences if they are found to be linked, directly or indirectly, to labour abuses.

To address the systemic issues documented in this report,

### THE GOVERNMENT OF SAUDI ARABIA MUST:

- ▶ Dismantle the kafala sponsorship system and reduce migrant workers' dependence on their employer.
- ▶ Enforce the prohibition on worker-paid recruitment fees.
- ▶ Effectively enforce all labour laws and regulations, including through stringent penalties for breaches.
- ▶ Strengthen laws on protection from heat stress and adopt a risk-based approach.
- ▶ Establish a universal non-discriminatory minimum living wage.
- ▶ Ratify and implement the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.

### COMPANIES OPERATING IN SAUDI ARABIA, INCLUDING THOSE INVOLVED IN THE RIYADH METRO PROJECT, SHOULD:

- ▶ Implement comprehensive human rights due diligence processes across all operations, commensurate to the high risk of abuse facing migrant workers.
  - ▷ If companies are unable or unwilling to do so, they should consider ceasing operations and withdraw from this business relationship.
- ▶ Play an active and direct role in recruitment, ensuring all workers are fully aware of the terms and conditions of their jobs and are not charged any recruitment fees or associated costs.
- ▶ Ensure access to remedy for all workers who have suffered abuse, including those found to have paid recruitment costs.

- ▶ Implement robust occupational health and safety measures taking account of Saudi Arabia's climatic conditions.

**GOVERNMENTS OF WORKERS' ORIGIN COUNTRIES, INCLUDING BANGLADESH, INDIA AND NEPAL, MUST:**

- ▶ Enact and enforce a prohibition on worker-paid recruitment fees and related costs.
- ▶ Monitor, investigate and adequately sanction the illegal conduct of recruitment businesses.
- ▶ Increase embassies' capacity to monitor and support migrant workers in destination countries.
- ▶ Ensure access to an effective complaint and remedial mechanism.

## 2. METHODOLOGY

This report is based on interviews conducted remotely by Amnesty International between December 2023 and May 2025 with 38 men from Nepal (33), Bangladesh (4) and India (1), all of whom worked on the Riyadh Metro project at various times between 2014 and 2025. At the time of interview, some were still employed while others had recently left their roles. The majority were employed there until at least 2023. Out of the 38 men, 32 were directly employed by some of the main contractors to the Riyadh Metro project – mostly by major international construction companies – under three different project consortiums; one worker was employed by one of the subcontractors to a main contractor; and six were employed by some of the labour supply companies providing workers to the construction of the project.

Amnesty International reviewed documentary evidence shared by the workers, including employment details and contracts, security passes and audiovisual material. The organization reviewed publicly available corporate information to establish facts about operations on the Metro project, and examined relevant Saudi Arabian laws and regulations, as well as applicable international human rights law and standards, including UN treaties and ILO Conventions.

This report investigates the working conditions of migrant workers delivering the Riyadh Metro construction project. It is not intended to provide a comprehensive assessment of the potential human rights failings of any corporate actors involved. Therefore, it is not making allegations against any company engaged on its delivery, including any company named in sources relied on or referenced in this report, nor is it a comprehensive analysis of all possible risks that workers and companies face in this context.

The analysis of racial discrimination in this report focuses on identifying indirect racial discrimination in wage-related policies and practices. It does not seek to assess whether the Nitaqat Program was designed or intended to be discriminatory. Instead, it focuses on the effects of the programme and related wage policies, particularly how the exclusion of non-citizens – who are predominantly racialized migrant workers – from wage protections results in disproportionate impacts. By assessing outcomes rather than intent, the analysis identifies forms of indirect racial discrimination embedded in the structure and implementation of labour policies.

On 1 October, the organization wrote to the Saudi Arabian authorities to present its findings and request a response to the allegations but had not received a reply by the time of publication.

To protect the identities of those interviewed, all names have been changed. Amnesty International urges all relevant parties to ensure that no reprisals are taken against individuals for participating in this research, in line with international human rights law and standards.<sup>1</sup>

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<sup>1</sup> The right to communicate with international human rights bodies, including non-governmental organizations, is articulated in Article 5(c) and 9(4) of the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms. Saudi Arabia was one of 42 countries highlighted in a 2022 report by the UN on reprisals against human rights defenders for their communications with UN bodies. See: OHCHR, *Cooperation with the United Nations, its representatives and mechanisms in the field of human rights*, A/HRC/51/47, 14 September 2022, para 128-141, <https://docs.un.org/en/A/HRC/51/47>

# 3. BACKGROUND

For years Saudi Arabia has been actively courting international investors and businesses to help deliver its flagship Vision 2030, a national plan to diversify the economy and decrease the country's dependence on income from oil.<sup>2</sup> At the heart of this transformation are a set of “giga-projects”<sup>3</sup> designed to spearhead the development of whole new economic sectors such as tourism<sup>4</sup> and entertainment<sup>5</sup>, as well as – among other things – artificial intelligence,<sup>6</sup> gaming<sup>7</sup> and mining.<sup>8</sup> According to McKinsey & Co, the country is expected to pour more than USD 175 billion annually into building projects between 2025 and 2028.<sup>9</sup> Major infrastructure plans are also underway to support international sporting and cultural events, such as the Asia Winter Games in 2029, Expo 2030 and the FIFA Men's football World Cup in 2034. Alongside these, futuristic developments like NEOM – which includes planned high-tech cities, luxury beach and mountain resorts and a floating industrial city – are in the works.<sup>10</sup> While not formally listed among Vision 2030's giga-projects, the Riyadh Metro is widely regarded as a cornerstone of Saudi Arabia's infrastructure modernization efforts, supporting the plan's goals to improve public transportation, attract foreign investment, and prepare for global events.<sup>11</sup>

**MIGRANT WORKERS  
MAKE UP  
87% OF THE  
CONSTRUCTION SECTOR  
WORKFORCE IN SAUDI ARABIA.**

2 Saudi Arabia, Vision 2030, [https://www.vision2030.gov.sa/media/rc0b5oy1/saudi\\_vision203.pdf](https://www.vision2030.gov.sa/media/rc0b5oy1/saudi_vision203.pdf)

3 A “Giga Project” is an extremely large-scale development, often worth tens or hundreds of billions of dollars, aimed at transforming regions or sectors. In Saudi Arabia, the term is used under Vision 2030 for landmark projects such as NEOM and the Red Sea Project. For more details about Saudi Arabia “giga projects”, see Public Investment Fund, “Giga-Projects”, <https://www.pif.gov.sa/en/our-investments/giga-projects/>

4 Ministry of Tourism, “Saudi Arabia Tops 100 Million Tourist Mark for the Second Year in a Row”, 22 June 2025, <https://mt.gov.sa/about/media-center/news/218/Ministry-of-Tourism:-Saudi-Arabia-Tops-100-Million-Tourist-Mark-for-the-Second-Year-in-a-Row->

5 Arab News, “Saudi entertainment industry set to power economic diversification”, 17 May 2025, <https://www.arabnews.com/node/2601136/business-economy>

6 Financial Times, “Saudi Arabia launches AI venture Humain ahead of Donald Trump visit”, 12 May 2025, <https://www.ft.com/content/2082b1e5-e571-42a5-96b6-e7d5c2977afa>

7 Public Investment Fund, “How PIF is supercharging the new golden age of gaming”, 30 January 2025, <https://www.pif.gov.sa/en/news-and-insights/news-network/2025/how-pif-is-supercharging-the-new-golden-age-of-gaming>

8 Reuters, “Saudi Arabia earmarks \$182 mln for minerals exploration in mining push”, 10 January 2024, <https://www.reuters.com/markets/commodities/saudi-arabia-allocates-182-mln-mineral-exploration-incentives-mining-minister-2024-01-10/>

9 Bloomberg, “Saudi Arabia Seen Spending \$175 Billion a Year on Building Boom”, 4 October 2023, <https://www.bloomberg.com/news/articles/2023-10-04/saudi-arabia-seen-spending-175-billion-a-year-on-building-boom>

10 NEOM, “About NEOM: Pioneering the Future of Livability and Business,” accessed 15 August 2025, <https://www.neom.com/en-us/about>

11 Arab News, “Saudi Arabia's transportation boom opens doors for private investment,” 9 August 2025,

<https://www.arabnews.com/node/2611282/business-economy>; and Arab News, “Investment Ministry efforts help boost Saudi FDI by 44%,” 1 July 2025, <https://www.arabnews.com/node/2606421/investment-ministry-efforts-help-boost-saudi-fdi-44>

## 3.1 CONSTRUCTION BOOM AND RELIANCE ON MIGRANT WORKERS

The Saudi private sector has historically relied heavily on migrant workers, who make up more than 75% of its labour force across a wide range of industries.<sup>12</sup> This is even more apparent in the construction sector where migrant workers account for over 87% of the workforce.<sup>13</sup> As such, they have played a key role in the country's development and will continue to do so, enabling Saudi Arabia to deliver on its mega-projects. For instance, the construction of NEOM involved 140,000 workers in 2024, with this number having been projected to rise to 200,000 in 2025,<sup>14</sup> while the luxury Red Sea tourism project is likely to involve at least 30,000 workers,<sup>15</sup> the vast majority of whom will be migrants. Similarly, in its Bid Book for the 2034 football World Cup published in July 2024, the Saudi Arabia Football Federation laid out ambitious plans for hosting the tournament, all of which will be reliant on enormous infrastructure projects built overwhelmingly by migrant workers. These include building or refurbishing 11 new stadiums, 185,000 additional hotel rooms, transport links and even new cities.<sup>16</sup>

Migrant workers in Saudi Arabia operate under the kafala (sponsorship) system, a legal framework that ties a worker's residency status to their employer, severely limiting their ability to change jobs, leave the country, or report abuse without facing retaliation or deportation. While recent reforms have sought to curtail some of the most exploitative aspects of this system (see chapter 5 for more details), significant gaps remain in enforcement and scope. These affect, among others, low-wage construction workers, many of whom are employed by subcontractors or 'labour supply' firms, which are prevalent in this sector. To meet workforce demands, particularly for large-scale ventures with tight deadlines, construction projects in Gulf countries, including Saudi Arabia, rely heavily on subcontractors and labour contractors who supply companies with workers. This outsourced model offers employment flexibility, allowing main contractors to side-step the kafala sponsorship system and rapidly scale-up operations without directly employing all personnel.<sup>17</sup> However, such multi-tiered structures often lead to a diffusing of companies' human rights responsibilities and reduction in their oversight of working conditions, heightening the risk of labour rights abuses, including wage theft and poor living conditions.<sup>18</sup>

Given this context, companies active in Saudi Arabia's construction sector – whether in design, engineering, project management, consulting, or actual building – are inevitably connected to workers governed by a labour system long associated with widespread and systematic human rights abuses. This association with abuses may exist regardless of whether the workers are employed directly, hired through subcontractors, outsourced, or engaged via business partnerships. Accordingly, all companies operating in or connected to the construction sector in Saudi Arabia have a heightened responsibility, under international business and human rights standards, to identify, prevent, and mitigate adverse human rights impacts within their operations and supply chains (see box below).

12 According to Labour Market Statistics in Q1 of 2025, non-Saudi employees constituted 80.1% (i.e. more than 9.767 million) of the total private sector employee. See tab 2-3, <https://www.stats.gov.sa/documents/20117/2435273/Register-based+Labour+Market+Statistics-+Q1+2025+EN+%281%29.xlsx/a6e354c1-4b81-8bb8-788a-0fd4e3ca22b1?t=1751144483051>

13 According to Labour Market Statistics in Q1 of 2025, 2,962,223 non-Saudis are currently working in the construction sector vs 434,440 Saudis. See tab 3-8: <https://www.stats.gov.sa/documents/20117/2435273/Register-based+Labour+Market+Statistics-+Q1+2025+EN+%281%29.xlsx/a6e354c1-4b81-8bb8-788a-0fd4e3ca22b1?t=1751144483051>

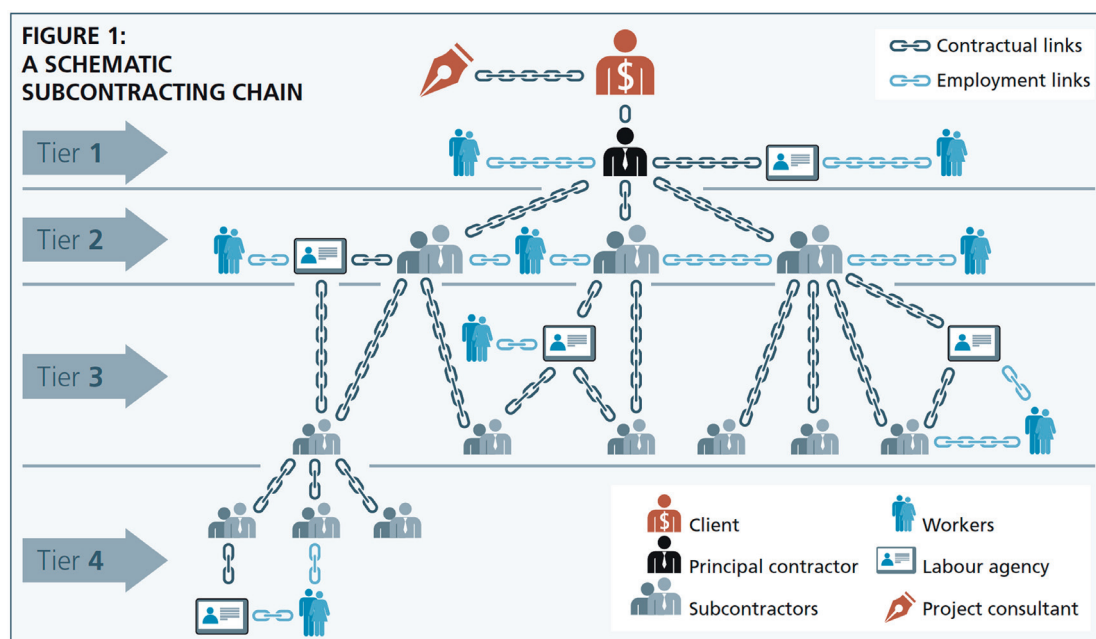
14 Saudi Gazette, "Nadhami Al-Nasr: 140,000 workers involved in NEOM projects around the clock", 15 May 2024, <https://saudigazette.com.sa/article/642862/SAUDI-ARABIA/Nadhami-Al-Nasr-nbnp140000-workers-involved-in-nbnpNEOM-projects-around-the-clock>.

15 Global Construction Review, "Saudi Arabia picks teams to build village for 10,000 workers on Red Sea tourism mega-scheme", 24 July 2019, <https://www.globalconstructionreview.com/news/saudi-arabia-picks-teams-build-village-10000-workers/>

16 Saudi Arabia Football Federation, 'Growing Together: The Saudi Arabia FIFA World Cup 2034 Bid', July 2024, <https://digitalhub.fifa.com/m/5590de2b652bef03/original/The-Saudi-Arabia-FIFA-World-Cup-2034-Bid-Book.pdf>

17 According to a white paper published by the ILO in 2018, "Construction contractors' search for greater flexibility in the employment of labour than is allowed under the sponsorship system has led to extensive subcontracting and to the outsourcing of labour requirements to labour supply companies." For more details, see ILO, White Paper, *Exploratory study of good policies in the protection of construction workers in the Middle East*, 20 February 2018, <https://www.ilo.org/publications/exploratory-study-good-policies-protection-construction-workers-middle-east>

18 ILO, White Paper, *Exploratory study of good policies in the protection of construction workers in the Middle East* (previously cited), p.3; also see for example, Human Rights Watch, 'Die First, and I'll Pay You Later': Saudi Arabia's 'Giga-Projects' Built on Widespread Labor Abuses, 4 December 2024, <https://www.hrw.org/report/2024/12/04/die-first-and-ill-pay-you-later/saudi-arabias-giga-projects-built-widespread-labor-abuses>; and Business and Human Rights Resource Centre (BHRRC), "We were treated as if we were machines" Migrant workers powering Saudi Arabia's energy transition, 6 October 2025, [https://media.business-humanrights.org/media/documents/2025\\_Gulf\\_RE\\_report.pdf](https://media.business-humanrights.org/media/documents/2025_Gulf_RE_report.pdf)



Example of a multi-tier contracting chain. © Engineers Against Poverty

## 3.2 RIYADH METRO PROJECT

Considered by the Saudi government to be the “backbone” of the capital’s public transport network, the Riyadh Metro Project was designed with the aim of providing “comfortable, affordable, and time-saving mobility options for all citizens” and benefiting the “traffic flow, economy, society, and environment in Riyadh.”<sup>19</sup> Approved in 2012, its construction began in April 2014<sup>20</sup> and the network became fully operationalized in January 2025.<sup>21</sup> Today, it stands as one of the most advanced metro networks in the world, spanning over 176km and including six different metro lines and 85 stations across the Riyadh area.<sup>22</sup> The tender process for a seventh metro line – known as the Qiddiya line – is currently underway,<sup>23</sup> which, according to Saudi Arabia’s World Cup Bid Book, will be operational before the tournament, ensuring accessibility to one of the key stadiums.<sup>24</sup>

The Riyadh Metro project is managed by the Royal Commission for Riyadh City (RCRC), which contracted several international architectural firms for the design and construction of the project, and is directly linked to Crown Prince Mohammed Bin Salman who serves as the head of its board and appoints its members.<sup>25</sup> In July 2013, contracts worth more than USD 22.5 billion were awarded to three foreign-led consortia to build

19 Royal Commission for Riyadh City, “King Abdulaziz project for Riyadh Public Transport”, accessed 15 August 2025, <https://www.rcrc.gov.sa/en/projects/king-abdulaziz-project-for-riyadh-public-transport-2/>; see also Arab News, “Riyadh Metro to ease traffic, boost environment”, 8 December 2024, <https://www.arabnews.com/node/2582191/riyadh-metro-ease-traffic-boost-environment>

20 Al Arabiya, “Saudi Arabia begins construction of multi-billion dollar metro project”, 5 April 2014, <https://english.alarabiya.net/webtv/reports/2014/04/05/Saudi-Arabia-begins-construction-of-multi-billion-dollar-metro-project-1655>

21 Saudi Gazette, “All 6 lines of Riyadh Metro will be operational with rollout of Orange Line on Sunday”, 4 January 2025, <https://www.saudigazette.com.sa/article/648365>

22 Saudi Gazette, “All 6 lines of Riyadh Metro will be operational with rollout of Orange Line on Sunday” (previously cited).

23 Railway Gazette, “Riyadh tenders metro Line 7 as ridership grows”, 19 May 2025, <https://www.railwaygazette.com/metros/riyadh-tenders-metro-line-7-as-ridership-grows/68815.article>

24 Saudi Arabia Football Federation, ‘Growing Together: The Saudi Arabia FIFA World Cup 2034 Bid (previously cited), p.192.

25 Previously known as Arriyadh Development Authority (ADA), the RCRC was founded in 1974 and reorganized in 2019. It directs Riyadh’s strategic planning and major projects and has its administrative and financial independence. The board of the RCRC is headed by Crown Prince Mohamed bin Salman and comprises of several ministers including interior, commerce, housing, environment, finance, planning, IT, transport, industry, and investment. For more information, see The Royal Commission for Riyadh City, “Origin and Development”, accessed 15 August 2025, [https://www.rcrc.gov.sa/en/establishment\\_and\\_evolution/](https://www.rcrc.gov.sa/en/establishment_and_evolution/)

the Riyadh Metro.<sup>26</sup> Several international and Saudi-headquartered firms were also contracted to design, construct, operate, or maintain different parts of the metro system.<sup>27</sup>

While the exact number of workers employed on the Riyadh Metro project is not publicly known, it appears to be in the tens of thousands. For example, one contractor estimated in 2013 that the project would generate over 30,000 jobs, with half of those positions allocated to the consortium it led.<sup>28</sup> In 2014, one consortium projected the need to employ around 25,000 workers during the construction period.<sup>29</sup> Speaking about the project in 2013, the president of the Arriyadh Development Authority (now the RCRC) noted that Saudi citizens would participate primarily in management and administrative roles during the construction phase. He also emphasized that greater employment opportunities for Saudi citizens would arise during the operational phase of the metro, suggesting that the lower-skilled construction roles were likely to be filled by migrant workers.<sup>30</sup>



← A man points at a map of the new Riyadh Metro in the Saudi capital on December 9, 2019.  
© GIUSEPPE CACACE/AFP/Getty Images

<sup>26</sup> Railway Technology, "Riyadh Metro, Saudi Arabia project", 3 August 2023, <https://www.railway-technology.com/projects/riyadh-metro-saudi-arabia/>

<sup>27</sup> Railway Technology, "Riyadh Metro, Saudi Arabia project" (previously cited).

<sup>28</sup> See for more details, FCC, "FCC lands largest international contract in the history of Spain's construction industry", 28 July 2013, <https://www.fcc.es/en/-/fcc-logra-el-mayor-contrato-internacional-de-la-historia-de-la-construccion-en-espana-ntilde-ola#>

<sup>29</sup> Staffing Industry Analysts, "Saudi Arabia - Riyadh Metro work drives recruitment", 5 May 2014, <https://www.staffingindustry.com/news/global-daily-news/saudi-arabia-riyadh-metro-work-drives-recruitment>

<sup>30</sup> Gulf News, "Saudi Arabia to spend \$800m on land for Riyadh metro", 15 September 2018, <https://gulfnews.com/business/saudi-arabia-to-spend-800m-on-land-for-riyadh-metro-1.1216763>

## THE HUMAN RIGHTS RESPONSIBILITIES OF COMPANIES

Companies have a responsibility to respect human rights across their global operations and value chains, as outlined in the UN Guiding Principles on Business and Human Rights – a set of UN endorsed standards grounded in international human rights law.

These globally accepted standards require businesses to avoid causing or contributing to negative human rights impacts and to address any such impacts linked to their activities, products, or services. This involves undertaking continuous human rights due diligence to identify, prevent, and mitigate risks, act on findings, track progress, and communicate actions taken,<sup>31</sup> as well as establishing processes to remediate harms they cause or contribute to.<sup>32</sup>

These responsibilities apply both to a company's own actions and omissions and to those arising from business relationships – including partners, suppliers, subcontractors, franchisees, clients, and other linked entities.<sup>33</sup>

Failure to comply with these standards throughout their value chains can result in serious reputational, legal and financial consequences for companies if they are linked either directly or indirectly to human rights abuses.

As Amnesty International has previously shown, the climate of repression in Saudi Arabia poses an acute challenge for businesses trying to conduct effective human rights due diligence in the country. For example, the government tightly restricts freedom of expression and association and does not permit migrant workers to form or join trade unions. Today, nearly all human rights defenders have been silenced through detention, trial, or imprisonment; independent human rights organizations have been shut down, with their members prosecuted; and in recent years the authorities have escalated their crackdown on individuals using online spaces to voice their opinions.<sup>34</sup> As a result, it may be difficult for businesses to develop an adequate and context-specific analysis of how their operations in the country may adversely impact human rights and produce a subsequent risk assessment. In turn, this may hamper their ability to effectively mitigate harms, putting them at risk of causing, contributing or being linked to human rights abuses. If they cannot conduct adequate human rights due diligence and show how they have addressed risks, businesses should consider not undertaking the relevant activity.<sup>35</sup>

**SAUDI ARABIA'S REPRESSIVE ENVIRONMENT MAKES IT DIFFICULT FOR BUSINESSES TO CARRY OUT MEANINGFUL HUMAN RIGHTS DUE DILIGENCE, INCREASING THE RISK OF LINKS TO ABUSE.**

<sup>31</sup> UN Guiding Principles 18-21

<sup>32</sup> UN Guiding Principle 15.

<sup>33</sup> UN Guiding Principle, 13(b); and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023 edition, p. 18, para. 17, [https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_a0b49990.html](https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html)

<sup>34</sup> Amnesty International, "Saudi Arabia: Alarming crackdown on online expression", 15 February 2023, <https://www.amnesty.org/en/latest/news/2023/02/saudi-arabia-alarming-crackdown-on-online-expression/>

<sup>35</sup> See, for example, Amnesty International (2020) Saudi Arabia: Assessment of human rights risks in Saudi Arabia for businesses and investors (AI Index: MDE 23/3321/2020), 9 November 2020, <https://www.amnesty.org/en/documents/mde23/3321/2020/en/>; and, Amnesty International, Playing a dangerous game? Human Rights risks linked to the 2030 and 2034 FIFA World Cups (AI Index: ACT 30/8071/2024), 5 June 2024, <https://www.amnesty.org/en/documents/act30/8071/2024/en/>

# 4. PATTERNS OF LABOUR ABUSE ON THE RIYADH METRO PROJECT

Migrant workers on the Riyadh Metro construction told Amnesty International of their experience working on the huge state-backed infrastructure project over the last decade. Many were charged illegal fees to secure work and then endured long, arduous hours in sometimes unsafe conditions for minimal, discriminatory pay. The following section provides a detailed account of these human rights abuses and their impact on workers' lives.

## 4.1 ABUSIVE RECRUITMENT PRACTICES

Almost all of those interviewed for this briefing said that recruitment – or ‘manpower’ – agencies in their home countries had demanded hefty payments to secure them work in Saudi Arabia, a practice that left many of them indebted before they even began work and increased their vulnerability to exploitation.

The Nepali men who worked on the Riyadh Metro project told Amnesty International that they had each paid, on average, almost USD 800 to recruiters, with some spending hundreds more for other migration-associated costs, such as medical tests and visa fees. Many said they had been charged as much as NPR 200,000 (USD 1,432) – more than twenty times the cap provided for under Nepal's ‘Free Visa Free Ticket’ Policy.<sup>36</sup> **“‘Free visa, free ticket’ is just what they say,”** one worker told Amnesty International, **“They charge money at the end.”**<sup>37</sup>

### DEFINITION OF ‘RECRUITMENT FEES’ AND ‘RELATED COSTS’:

**“any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.”**

ILO, General Principles and Operational Guidelines for Fair Recruitment and definition of recruitment fees and related costs.

<sup>36</sup> Since 2015, this policy has limited the amounts recruitment agents can demand from job seekers to NPR 10,000 (USD 71) and required foreign employers from seven states, including Saudi Arabia, to bear the costs of their visas and airfares. However, in its research Amnesty International found that the government has failed to properly resource, monitor, or enforce the implementation of this policy resulting in only one in five migrant workers reporting enforcement. For more details see: Amnesty International, *Nepal: Turning people into profits: Abusive recruitment, trafficking and forced labour of Nepali migrant workers* (Index: ASA 31/6206/2017), 6 June 2017, <https://www.amnesty.org/en/documents/asa31/6206/2017/en/>

<sup>37</sup> Interview conducted remotely, June 2024.

## INTERNATIONAL STANDARDS ON RECRUITMENT FEES:

**“workers shall not be charged directly or indirectly, in whole or in part, any fees or related costs for their recruitment.”**

*ILO, General Principles and Operational Guidelines for Fair Recruitment and definition of recruitment fees and related costs.*

The Bangladeshi workers interviewed reported paying even more, averaging USD 2,700 each – the equivalent of approximately seven months of their wages in Saudi Arabia,<sup>38</sup> and more than double the USD 1,300 limit placed by the Bangladesh government on costs of recruitment to Saudi Arabia. While there is no law explicitly prohibiting the payment of recruitment fees by Bangladeshi workers seeking employment abroad, the Bureau of Manpower, Employment, and Training (BMET) has set fee ceilings ranging from BDT 97,780 (USD 1,154) to BDT 166,680 (USD 1,967), depending on the destination country. In practice, however, recruiters routinely charge amounts well above these limits.<sup>39</sup> For instance, according to Bangladesh’s 2022 Labour Force survey, this is not unusual – on average nationals travelling to Saudi Arabia can expect to pay more than USD 3,000.<sup>40</sup>

Janak, from India, told Amnesty International that he paid almost USD 3,500 (INR 300,000) to secure his job as a mason for one of the subcontracting companies on the Riyadh Metro project<sup>41</sup> – ten times the amount permitted under Indian law.<sup>42</sup>

In addition to restrictions imposed by some origin countries on fees for securing overseas employment, Saudi Arabia’s laws explicitly prohibit the payment of recruitment fees by migrant workers. All such costs must be borne by the employer. Employers are also legally required to cover the costs of the migrant worker’s residence permit (iqama), work permit fees, renewals, and any related fines.<sup>43</sup> These provisions align with international standards on fair recruitment, which recognize the exploitative nature of recruitment fees and prohibit workers from bearing any associated costs.<sup>44</sup>

Violations of these laws are punishable by fines ranging from SAR 1,000 to 3,000 (USD 266–799) per worker, depending on the size of the establishment.<sup>45</sup> Notably, these penalties were significantly reduced in

COUNTRY	AMOUNT RECRUITERS CAN LEGALLY CHARGE WORKERS GOING TO SAUDI ARABIA	AVERAGE FEES PAID BY WORKERS INTERVIEWED BY AMNESTY INTERNATIONAL
Bangladesh	Up to USD 1,300	USD 2,700
India	Up to USD 344 + 18% tax	USD 3,500
Nepal	Up to USD 71	USD 800

According to Saudi Arabia laws, no fees should be borne by prospective migrant workers seeking to work in the country.

38 Based on an average of SAR 1,400 (USD 375) that was earned per month by those interviewed for this report. See chapter 4.2 below.

39 Bangladesh imposes limits on recruitment costs that can be charged by agents on a country-by-country basis. Oviyashi Karmi Unnayan Program (OKUP), A Far Cry from Justice for Migrants: A Critical Analysis of Migrants’ Experiences in the Arbitration System in Bangladesh, 9 July 2025, [https://www.okup.org.bd/wp-content/uploads/2025/07/A2J\\_far-cry-from-justice-2025.pdf](https://www.okup.org.bd/wp-content/uploads/2025/07/A2J_far-cry-from-justice-2025.pdf) Such payments are in line with findings from other research on the migration of Bangladeshi workers to Saudi Arabia. See for example, Bangladesh Bureau of Statistics, Cost of Migration Survey: Bangladesh 2020, 13 January 2020, P. viii, [https://bbs.portal.gov.bd/sites/default/files/files/bbs.portal.gov.bd/page/b343a8b4\\_956b\\_45ca\\_872f\\_4cf9b2f1a6e0/2020-11-30-11-01-cda02cf07d0903350687e8f8d128baca.pdf](https://bbs.portal.gov.bd/sites/default/files/files/bbs.portal.gov.bd/page/b343a8b4_956b_45ca_872f_4cf9b2f1a6e0/2020-11-30-11-01-cda02cf07d0903350687e8f8d128baca.pdf)

40 ILO, Global Study on Recruitment Fees and Related Costs: Second Edition, Fair Recruitment Knowledge Hub, April 2024, P. 137, <https://www.fairrecruitment.org/sites/default/files/2024-04/QLFS%202022.pdf>

41 Interview conducted remotely, November 2024.

42 The Emigration Rules, 1983, Rule 25, available at: <https://indiankanoon.org/doc/33613791/>

43 Labour Law, article 40.

44 ILO, General Principles and Operational Guidelines for Fair Recruitment and definition of recruitment fees and related costs, 2019, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed\\_protect/@protrav/@migrant/documents/publication/wcms\\_703485.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_703485.pdf)

45 MHRSD, Ministerial Decision No. 75913 dated 19/5/1445, [https://www.hrsd.gov.sa/sites/default/files/2023-12/قرار\\_جدول\\_المخالفات\\_والتعويضات.pdf](https://www.hrsd.gov.sa/sites/default/files/2023-12/قرار_جدول_المخالفات_والتعويضات.pdf) In 2025, these penalties were re-affirmed following a public consultation. See MHRSD, Table of Violations and Penalties for the

2023 from a previous fine of SAR 10,000 (USD 2,666) per worker irrespective of company size<sup>46</sup> – risking undermining the deterrent effect and sending a concerning signal to employers about how serious the government considers such breaches.

Overall, that such payments remain common place amongst those seeking work in both Saudi Arabia and the wider Gulf points to insufficient regulation in origin countries<sup>47</sup> and ineffective enforcement of the ‘Employer Pays Principle’ at destination,<sup>48</sup> leaving migrant workers at heightened risk of falling into debt bondage and other situations of forced labour.<sup>49</sup>

Indeed, with few savings, some of the men that spoke to Amnesty International described selling land or taking out substantial loans to cover these prohibitive costs. Chandra, an office assistant, storekeeper and driver for a main contractor until 2023, explained it took him two years to pay off his NPR 100,000 (USD 713) loan, at a rate of 36% interest per month, due to his low wages in Saudi Arabia.<sup>50</sup>

Another Nepali worker, Nabin, who was also employed directly by a main contractor as a cleaner on the project, told Amnesty how he paid for his recruitment:

**“I paid 100,000 rupees (USD 713) to the manpower agent. But during the preparatory work – travel, medical tests, and other paperwork – I spent a total of 200,000 rupees (USD 1,432). I didn’t have money with me at that time... I borrowed some gold from my wife’s parents, sold it, and got some cash. That’s how I managed to get to Saudi. As the price of gold increased, I paid almost double for that. It took me six months to pay off the loans.”<sup>51</sup>**

Recruitment agents in origin countries were clearly aware of the rules around recruitment fees, with several workers reporting that they were told not to disclose their payments if asked, and some Nepali interviewees saying their recruiters even made them record videos stating they had paid only NPR 10,000 (USD 71), as is permitted under the Free Visa, Free Ticket policy. Jay told Amnesty International that he was charged almost USD 1,000 to get his job in a company subcontracted to the Metro construction from 2021 to 2023:

**“When coming to Saudi, the manpower people even made a video of us, asking us to say, ‘We only paid 10,000 rupees (USD 71) to get this visa.’ We paid a lot of money. But they asked us to say only 10,000 rupees. We had to go abroad, so we were compelled to say whatever they asked us to say.”<sup>52</sup>**

Senior staff from at least one of the main contractors engaged on the Riyadh Metro project asked workers upon their arrival in Saudi Arabia whether they had paid anything to secure the job. Krishna, who worked on the project until 2024, said that he had paid NPR 100,000 (USD 713) to an agency in Nepal in 2018 but was given a receipt for only 15% of that. He told Amnesty International how the construction company sought to justify the costs that were passed on to him, despite these breaching both Saudi and Nepali law and policy:

Labour Law and Its Executive Regulations After Amendment, <https://istitlaa.ncc.gov.sa/ar/labor/hrsd/resolutions2/Documents/جدول المخالفات و العقوبات لنظام العمل ولائحته التنفيذية بعد التعديل.pdf>

46 MHRSD, Ministerial Decision No. 92768 dated 05/05/1443, <https://www.hrsd.gov.sa/sites/default/files/2023-02/e92768.pdf> 92768 dated 05/05/ <https://www.hrsd.gov.sa/sites/default/files/2023-02/e92768.pdf>

47 See: Amnesty International, Turning people into profits (previously cited); and Kathmandu Post, “Nepal is a champion country for fair recruitment, but on paper only, observers say”, 30 January 2023, <https://kathmandupost.com/money/2023/01/30/nepal-is-a-champion-country-for-fair-recruitment-but-on-paper-only-observers-say?fbclid=IwAR3TYW15ZW9LsuMjOI8nzbGuixJiFdvYZKhcwnk6ZzaNrI1POSImijU-sM>

48 The Employer Pays Principle reflects international best practice and states that no worker should pay for a job and employers should bear the costs of recruitment. See: IHRB, *Six steps to responsible recruitment*, [https://ihrb.org.files.svdcn.com/production/assets/uploads/member-uploads/Six\\_Steps\\_to\\_Responsible\\_Recruitment\\_-\\_Leadership\\_Group\\_for\\_Responsible\\_Recruitment.pdf?dm=1726489439](https://ihrb.org.files.svdcn.com/production/assets/uploads/member-uploads/Six_Steps_to_Responsible_Recruitment_-_Leadership_Group_for_Responsible_Recruitment.pdf?dm=1726489439) For more on abusive recruitment practices, see FairSquare’s Five Corridors Project, <https://fivecorridorsproject.org/>

49 See: United Nations, General Assembly, Report of the Special Rapporteur on Contemporary forms of Slavery, including its Causes and Consequences, A/HRC/33/46, 4 July 2016. For a detailed analysis of risks to migrant workers of debt bondage and other abusive recruitment practices, see: Amnesty International, *Turning people into profits* (previously cited).

50 Interview conducted remotely, November 2024.

51 Interview conducted remotely, September 2024.

52 Interview conducted remotely, June 2024.



**THE WIDESPREAD PAYMENT OF RECRUITMENT FEES HIGHLIGHTS WEAK REGULATION IN ORIGIN COUNTRIES AND POOR ENFORCEMENT OF THE ‘EMPLOYER PAYS PRINCIPLE’ AT DESTINATION – LEAVING MIGRANT WORKERS AT RISK OF DEBT BONDAGE AND FORCED LABOUR.**



↑ A former construction worker in the Gulf walks through a village after returning to his home country of Nepal. © Sagar Chhetri/For The Washington Post/Getty Images

**“In Saudi Arabia, we were asked: ‘Did you pay to get this job?’ We said the amount of money we paid. Then they [managers] said: ‘You were charged perhaps because of the managers’ expenses.’ The managers who interviewed us [in Nepal] stayed in the hotel for several days, and it was impossible for the manpower firm to cover all the expenses. So, [that’s why] they charged us money.”<sup>53</sup>**

Another worker from the same company said he paid NPR 130,000 (USD 921) to a recruiter in Nepal, but when asked by his employer, he denied making any payment – telling Amnesty International he did so under the agent’s instructions.<sup>54</sup>

It is notable that this contractor took the proactive step of asking workers directly whether they had paid fees to secure their jobs – an indication that they were aware of the issue. However, even when workers disclosed these payments – despite agents often warning them not to – the company did not take meaningful action to address the issue or ensure workers received remedy, including, for example, by being reimbursed for the fees paid.

Moreover, the fact that nearly all 38 people Amnesty International interviewed who worked on the Riyadh Metro for different companies and at different times consistently reported being charged excessive and illegal recruitment fees underscores a troubling pattern: that both companies delivering the project, and the Saudi Arabian government itself, took insufficient action – if any – to address or prevent this long-standing and systemic exploitation which civil society organizations have documented for years.<sup>55</sup>

**BOTH THE COMPANIES AND THE SAUDI ARABIAN GOVERNMENT TOOK INSUFFICIENT ACTION – IF ANY – TO TACKLE THE LONG STANDING AND SYSTEMIC ISSUE OF RECRUITMENT FEES.**

<sup>53</sup> Interview conducted remotely, July 2024.

<sup>54</sup> Interview conducted remotely, June 2024.

<sup>55</sup> See, for example: ILO, *The cost of recruitment: What low-skilled migrant workers from Pakistan pay to work in Saudi Arabia and the United Arab Emirates*, 2016, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-kathmandu/documents/publication/wcms\\_514127.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-kathmandu/documents/publication/wcms_514127.pdf); and Migrant -Rights.org, “Huge Recruitment Fees Charged for Jobs in the Gulf; Qatar Recruiters Accused of Demanding the Highest Commissions”, 25 June 2022, <https://www.migrant-rights.org/2022/06/huge-recruitment-fees-charged-for-jobs-in-the-gulf-qatar-recruiters-accused-of-demanding-the-highest-commissions/>; and The Guardian, “Used, abused and deported: migrant workers land back in Bangladesh after Saudi dreams turn sour”, 21 March 2024, <https://www.theguardian.com/global-development/2024/mar/21/used-abused-and-deported-migrant-workers-land-back-in-bangladesh-after-saudi-dreams-turn-sour>

Some workers also reported being misled by recruitment agents or brokers about key aspects of their employment in Saudi Arabia, including the type of company they would be working for, their salary, and the terms and conditions of the job. Pradeep expressed helplessness when he learned he'd be earning less than promised by his recruitment agent: **"It made me mad. But what to do? I was there for the family's survival. So, I continued working"**. When he tried to complain to his employer, a main contractor on the project, he said they simply dismissed his concern.<sup>56</sup>

Strikingly, none of the six interviewees who ended up employed by labour supply companies were aware of this arrangement beforehand. All said they had been told they would be hired directly by a main contractor or subcontractor – an arrangement they believed would offer better working conditions. They only discovered the truth after paying the agents, by which time they felt it was too late to turn back.<sup>57</sup>

Pawan told Amnesty International that he had been told he was being sent to a major energy company, only to find out he would be working on the Riyadh Metro project for an intermediary: **"[The recruitment agent] assured me that [the energy company] was a good company. Believing him, I handed over the money. However, only after making the payment did I realize that they were actually sending me to a supply company instead... I had already paid the money, so I had no choice but to proceed"**.<sup>58</sup>

## 4.2 DANGEROUS WORKING IN THE HEAT

### **"When I work in the extreme heat, I feel like I'm in hell."**

(Indra, a tile mason from Nepal)

Indra, a tile mason working for a main contractor on the Riyadh Metro since 2022, described to Amnesty International the harsh conditions he endures while stationed outdoors along the project's roads. **"When I work in the extreme heat, I feel like I'm in hell,"** he explained:

**"I think – How did I end up here? Did I commit anything wrong so that God is punishing me?... What made me work in this environment? Nobody wants to work in these situations by their choice. But what can I do? I didn't have a job in Nepal. I came here to support my family. So, I must be ready to suffer."**<sup>59</sup>

Indra's experience is far from unique. Extreme heat and humidity pose serious health risks to workers across the Gulf. Those in jobs such as construction, which is physically strenuous and often performed outdoors with little protection from the weather, are particularly vulnerable to such impacts. The World Health Organization (WHO) warns that exposure to high temperatures has serious physiological impacts and can result in disability and premature death.<sup>60</sup> In Saudi Arabia, one of the hottest and sunniest countries in the world,<sup>61</sup> these risks have been evident for several years.<sup>62</sup>

 **\* PROLONGED EXPOSURE TO HIGH TEMPERATURES CAN RESULT IN DISABILITY AND PREMATURE DEATH.**

<sup>56</sup> Interview conducted remotely, November 2024.

<sup>57</sup> In previous research, Amnesty International documented a recurring pattern of workers being deceived or misled by local recruiters or representatives of Saudi labour supply companies regarding the terms and conditions of their employment. Workers were often told they would be employed directly by international companies – such as Amazon or Carrefour – only to discover upon arrival in Saudi Arabia that they were instead employed by labour supply companies and deployed to work in the warehouses or facilities of those companies. For more information see, Amnesty International, *'Don't worry, it's a branch of Amazon': Exploitation of migrant workers contracted to Amazon in Saudi Arabia*, (Index Number: MDE 23/7229/2023), 10 October 2023, <https://www.amnesty.org/en/documents/mde23/7229/2023/en/>; and Amnesty International, *'I would fear going to work': Labour exploitation at Carrefour sites in Saudi Arabia*, (Index Number: MDE 23/8586/2024), 21 October 2024, <https://www.amnesty.org/en/documents/mde23/8586/2024/en/>.

<sup>58</sup> Interview conducted remotely, February 2025.

<sup>59</sup> Interview conducted remotely, January 2025.

<sup>60</sup> WHO, "Climate Change, Heat, and Health," 28 May 2024, <https://www.who.int/news-room/fact-sheets/detail/climate-change-heat-and-health>

<sup>61</sup> Al-Bouwathan, M., Quinn, M. M., Kriebel, D., & Wegman, D. H., *Assessment of Heat Stress Exposure among Construction Workers in the Hot Desert Climate of Saudi Arabia*, Annals of Work Exposures and Health, Volume 63, Issue 5, June 2019, Pages 505–520, p. 506, available at: <https://doi.org/10.1093/annweh/wxz033>

<sup>62</sup> See for example: Migrant-Rights.org, "Summer Midday Work Ban Fails to Adequately Protect Workers," 14 June 2021, <https://www.migrant-rights.org/2021/06/summer-midday-work-ban-fails-to-adequately-protect-workers/>; and Vital Signs Partnership, *Killer Heat: The Impact of Extreme Temperatures and Climate Change on Migrant Workers in the Gulf*, Report 3, June 2023, [https://vitalsignsproject.org/wp-content/uploads/2023/06/Vital\\_signs\\_3\\_online.pdf](https://vitalsignsproject.org/wp-content/uploads/2023/06/Vital_signs_3_online.pdf) <https://www.arabnews.com/node/2542111/saudi-arabia>;

Since 2014, the Saudi Ministry of Human Resources and Social Development (MHRSD) has prohibited outdoor work in direct sunlight for nearly all workers covered by the Labour Law, including construction workers, between 12pm and 3pm from 15 June until 15 September each year.<sup>63</sup> Yet despite the serious health risks posed by extreme heat, employers who violate this ban now face a fine of just SAR 1,000 (USD 266) per worker – a two-thirds reduction from the penalties in place in 2021.<sup>64</sup> This weakening of sanctions signals that the government does not take breaches seriously, reducing the incentive to comply and undermining the protective intent of the regulation.

In 2021, the MHRSD also issued guidelines requiring employers to take a variety of measures to mitigate the risks of heat exposure, including training staff; monitoring temperature and humidity; providing cold water, appropriate rest areas and Personal Protective Equipment (PPE) such as light-coloured clothing; and scheduling work in the coolest hours of the day. It also urges employers to conduct risk assessments, allow workers to acclimatise and ensure regular breaks.<sup>65</sup> These guidelines are not in themselves legally enforceable, although more general failures to take measures to protect the health and safety of workers can render employers liable to financial penalties.<sup>66</sup>

 **A 2016 STUDY FOUND PEAK HEAT EXPOSURE ON CONSTRUCTION SITES IN SAUDI ARABIA FROM 9AM–12PM, WITH WORKERS STILL FACING HUNDREDS OF HOURS IN EXTREME HEAT DESPITE THE MIDDAY BAN.**

In 2025, the Saudi Arabian media reported that MHRSD received 325 complaints about breaches of the summer work ban between 15 June and 15 September 2025, and that labour inspectors had carried out 29,000 field visits to ensure compliance, detecting 2,414 breaches in the process.<sup>67</sup> However, the report did not say what measures the government had taken in response, and Amnesty International was not able to find publicly available information detailing the number of fines or other penalties imposed on employers who breached the ban in 2025 or previous years. The government did not respond to the organization's requests for this data.<sup>68</sup>

Most of those interviewed by Amnesty International confirmed that their company does stop them working during the midday summer hours, in line with the government's ban,<sup>69</sup> and many said that water would be provided and that health professionals were on hand in case of any incidents.

Nonetheless, workers also described their struggle working in the hours and months either side of the summer ban, when temperatures would often remain extremely high and unforgiving. A 2016 study in Saudi Arabia found that the highest intensity of heat exposure were between the hours of 9am-12pm and concluded that even workers in companies that complied with the midday ban were exposed to hundreds of hours in dangerously high temperatures.<sup>70</sup> In June, July and August of 2024 and 2025 for example, Riyadh stayed at 40°C or higher for more than eight hours each day, often from around 11am until 7 or 8pm, indicating that the ban offers far from adequate protection from exposure to extreme heat.<sup>71</sup> Indeed, the

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and Arab News, "Saudi Arabia to Experience Scorching Heat Through the Month," 2 July 2024,

<https://www.arabnews.com/node/2542111/saudi-arabia>

63 Exceptions are made for those working in oil and gas companies and emergency maintenance. Ministerial Decision No. (3337) of 2014, [https://www.hrsd.gov.sa/sites/default/files/2023-02/3337\\_0.pdf](https://www.hrsd.gov.sa/sites/default/files/2023-02/3337_0.pdf) This replaced a 2010 ban in place from 1 July to the end of August. See: Ministerial Decree No. (1559) of 2010 available at, <https://gulfmigration.grc.net/saudi-arabia-the-decision-to-ban-working-under-the-sun/?print=print>

64 See: MHRSD, Ministerial Decision No. 75913 dated 19/5/1445 issued in 2023 and, previously: MHRSD, Ministerial Decision No. 92768 dated 05/05/1443, issued in 2021.

65 MHRSD, "Procedural Guidelines for Occupational Safety and Health for preventing the Effects of Exposure to The Direct Sun and Heat Stress", 2021, <https://www.hrsd.gov.sa/en/knowledge-centre/decisions-and-regulations/regulation-and-procedures/837946>

66 See: MHRSD, "Procedural Guidelines for Occupational Safety and Health for preventing the Effects of Exposure to The Direct Sun and Heat Stress" (previously cited). Amnesty International could not identify any publicly available data on the number of fines issued and the government did not respond to the organization's request for information.

67 Arab News, "Saudi lifts summer ban on working in sunlight as cooler weather arrives", 17 September 2025, <https://www.arabnews.com/node/2615421/saudi-arabiahttps://www.arabnews.com/node/2615421/saudi-arabia>

68 MHRSD, Ministerial resolution 92768, Decision table of violations and corresponding penalties 92768, 2021, available at: <https://www.hrsd.gov.sa/sites/default/files/2023-02/e92768.pdf> (accessed 19 August 2025)

69 This does not appear to be the case on all work sites in Saudi Arabia, however. For example, a 2019 academic study on heat stress exposure among construction workers in Saudi Arabia found that outdoor work continued during the midday ban on four out of 10 work sites being observed in Al Ahsa region. See: Al-Bouwarthan, M., Quinn, M. M., Kriebel, D., & Wegman, D. H., *Assessment of Heat Stress Exposure among Construction Workers in the Hot Desert Climate of Saudi Arabia* (previously cited), p. 510

70 Al-Bouwarthan, M., Quinn, M. M., Kriebel, D., & Wegman, D. H., *Assessment of Heat Stress Exposure among Construction Workers in the Hot Desert Climate of Saudi Arabia* (previously cited), p.511.

71 See: Meteostat, *Historical Weather Data for Riyadh, Saudi Arabia*, accessed 3 September 2025, <https://meteostat.net/en/place/sa/riyadh?s=40438&t=2025-07-18/2025-07-25>; see also: Arab News, "Saudi Arabia to Experience Scorching Heat Through the Month," 2 July 2024, <https://www.arabnews.com/node/2542111/saudi-arabia>; and Gulf News, "Saudi Arabia's summer to begin on June 1 amid high temperature warnings", 22 May 2025, <https://gulfnews.com/world/gulf/saudi/saudi-arabias-summer-to-begin-on-june-1-amid-high-temperature-warnings-1.500136170>

number of hot days and the extent of the heat in Saudi Arabia is increasing with global climate change; climate scientists expect this trend to continue.<sup>72</sup>

Ramesh, a Nepali plumber employed by a subcontractor on the metro since 2019, explained the risks he and colleagues faced despite his company implementing the midday ban and some other measures:

**“During the summer, it’s extremely difficult to work in the heat. The company’s safety personnel stop the work at 11am and we resume in the afternoon. Because of the heat, workers often faint. It’s so unbearable that some collapse while working. That’s why the safety personnel require workers to always be accompanied by a co-worker. Even when going to the toilet, we’re asked to go with someone else, so if one person faints, the other can call for help.”<sup>73</sup>**

Bishnu said that even his break during the midday hours was spent outside, in uncomfortable temperatures:

**“During those rest hours, we don’t have access to an air-conditioned room. We just rest in the shade. The hot wind blows during the day, but we cannot sit in an air-conditioned room. In Riyadh Metro, I have worked in temperatures of 48 degrees Celsius.”<sup>74</sup>**

Chandra also described the impacts he witnessed and how he coped:

**“I have seen many workers fainting in the mess [canteen]. They would rush to eat from work. They would eat hot food, keep sweating, and fainting... I would fear I might collapse. To avoid that, I would keep drinking water. The safety people would say, ‘work and rest if needed. Be safe.’ But even if they say so, the climate there is so hot, so it’s very difficult as long as workers are under the sun.”<sup>75</sup>**

Several workers explained the physical effects of work in temperatures between 40-50°C. Chandra continued,

**“My whole body would feel burning. Sweat would come out continuously.”<sup>76</sup>**

Indra said:

**“my whole body soaks in sweat. I feel uneasy. I feel like I will faint anytime. My vision gets blurry; eyes burn due to sweat. Luckily, I haven’t fainted yet. But I have seen many workers faint due to heat in the summer.”<sup>77</sup>**

A few workers complained that their employers would not permit them to take breaks when needed because of the heat, in contradiction of the MHRSD’s guidelines. Bikram worked on the Metro project for a main contractor between December 2016 and March 2024 and said he and colleagues would **“steal the chance to rest. The company didn’t give us a break, but we would rest secretly”**.<sup>78</sup> Janak, a mason from India up until 2021, said he faced pressured by more senior staff at the subcontractor he worked for, and explained that his position as a low-paid migrant made it difficult for him to challenge them:

**“The foremen and engineers would force us to work overtime even in hot temperatures. We would say, ‘We can’t. It’s extremely hot.’ But they would say, ‘keep working’... What can poor people do? We have to work. We have to do a difficult job.”<sup>79</sup>**

A lot of the construction work for the metro happened underground as tunnels were dug and fitted out. Some of those interviewed said that particularly in the early stages of their construction, before air conditioning facilities were installed, the tunnels would also get extremely hot and would have limited oxygen,

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72 Al-Jazeera, “Middle East countries face extreme heat risk, study finds”, 23 May 2023, <https://www.aljazeera.com/news/2023/5/23/middle-east-countries-face-extreme-heat-risk-study-finds>; and Reuters, “Climate change boosted deadly Saudi haj heat by 2.5 C, scientists say”, 28 June 2024, <https://www.reuters.com/business/environment/climate-change-boosted-deadly-saudi-haj-heat-by-25-c-scientists-say-2024-06-27/>

73 Interview conducted remotely, March 2025.

74 Interview conducted remotely, February 2025.

75 Interview conducted remotely, November 2024.

76 Interview conducted remotely, November 2024.

77 Interview conducted remotely, January 2025.

78 Interview conducted remotely, June 2024.

79 Interview conducted remotely, October 2024.




© ↑ Foreign labourers work at a construction site amid scorching heat in the Saudi capital Riyadh, on June 16, 2022. © FAYEZ NURELDINE/AFP/Getty Images

making workers feel faint and sick. **“I would be soaked in sweat”**, said Dinesh from Nepal.<sup>80</sup> These workers were excluded from the protection offered by the midday work ban, which applies only to those working outdoors in direct sunlight.

International law recognizes the right of everyone to the enjoyment of the highest attainable standard of physical and mental health,<sup>81</sup> with “healthy working and environmental conditions” being considered one of the underlying determinants of health.<sup>82</sup> Additionally, the Office of the UN High Commissioner for Human Rights and the WHO have drawn specific attention to how the right to health of migrants “is closely related to and dependent on their working and living conditions and legal status” and note that properly addressing their health issues requires states to ensure “adequate housing, safe and healthy working conditions, an adequate standard of living, food, information, liberty and security of person, due process, and freedom from slavery and compulsory labour.”<sup>83</sup> In 2024, Saudi Arabia ratified the ILO’s Promotional Framework for Occupational Safety and Health Convention, committing itself to establishing and continuously improving a national framework for occupational safety and health (OSH) with the aim of preventing occupational injuries, diseases, and deaths.<sup>84</sup>

There is no universally agreed set of international standards on protection from the risks of heat exposure. However, the ILO,<sup>85</sup> the US Centers for Disease Control and Prevention and the National Institute for Occupational Safety and Health,<sup>86</sup> consider use of the Wet-Bulb Globe Temperature (WBGT) Index – a measure of environmental heat that assesses the combined effect of air temperature, humidity, wind speed, and radiant heat (such as sunlight), to be the most effective indicator for assessing

 **INTERNATIONAL LAW RECOGNIZES THE RIGHT OF EVERYONE TO THE ENJOYMENT OF THE HIGHEST ATTAINABLE STANDARD OF PHYSICAL AND MENTAL HEALTH.**

<sup>80</sup> Interview conducted remotely, November 2024

<sup>81</sup> International Covenant on Economic, (ICESCR), article 12.

<sup>82</sup> Committee on Economic, Social and Cultural Rights (CESCR) General Comment No. 14: The Right to the Highest Attainable Standard of Health (Art. 12), 2000, para. 15.

<sup>83</sup> The Office of the United Nations High Commissioner for Human Rights (UNHCR) and the WHO, *The Right to Health: Fact Sheet no. 31*, June 2008, <https://www.ohchr.org/en/publications/fact-sheets/fact-sheet-no-31-right-health>

<sup>84</sup> ILO, “Saudi Arabia Ratifies the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187),” 5 June 2024, <https://www.ilo.org/resource/news/ilc/112/saudi-arabia-ratifies-promotional-framework-occupational-safety-and-health>

<sup>85</sup> ILO, *Heat and OSH Policy Brief: Best practices in the GCC region and beyond*, p.3, <https://www.ilo.org/publications/heat-and-osh-policy-brief-best-practices-gcc-region-and-beyond>

<sup>86</sup> Centers for Disease Control and Prevention (CDC), National Institute for Occupational Safety and Health (NIOSH), *Criteria for a Recommended Standard: Occupational Exposure to Heat and Hot Environments*, DHHS (NIOSH) Publication No. 2016-106, February 2016, <https://www.cdc.gov/niosh/docs/2016-106/default.html>

the impact of workplace heat exposure on human health and productivity.<sup>87</sup> WBGT can be applied in both sun-exposed and shaded or indoor conditions.<sup>88</sup>

International health and safety experts previously interviewed by Amnesty International on this issue, concurred and emphasized how critical it is that focus is placed not only on enforcing midday working bans, but also on managing heat risks throughout the day using mandatory work-rest ratios that consider level of exertion and the WBGT index, a measure not used by Saudi Arabia. Professor David Wegman, an expert on health and safety in the construction industry, explained that avoiding heat-related illness “is critically dependent on a balance of work and rest” and that voluntary measures for workers are insufficient because “individuals are unable to perceive work-rest ratios with sufficient accuracy to rest voluntarily as frequently or for sufficient duration as is necessary to protect health.”<sup>89</sup>

Saudi Arabia’s laws and policies include important measures to safeguard workers from the harmful effects of prolonged heat exposure. However, by failing to take a risk-based approach, mandating compulsory rest periods and complete work stoppages during periods of extreme heat and humidity that fall outside the official summer ban, they remain inadequate to mitigate against the serious health risks faced by outdoor migrant workers. These shortcomings constitute a violation of the right to safe and healthy working conditions under international law.

## 4.3 LOW AND DISCRIMINATORY WAGES, LONG HOURS

### “I deserve better work and better pay.”

(Kamal, an electrician from Nepal.<sup>90</sup>)

The ILO has affirmed the right to a living wage of a level “that is necessary to afford a decent standard of living for workers and their families”. This should take “into account the country circumstances” and be “calculated for the work performed during the normal hours of work”. The wage level should therefore not include overtime pay.<sup>91</sup> The concept of a living wage is consistent with international human rights law, which articulates that states should guarantee fair wages that ensure a decent standard of living for an individual and their family, enabling them to enjoy other human rights such as food, water, housing, health care, education, clothing and sanitation, among others.<sup>92</sup> States must ensure the right to a living wage without discrimination. This includes addressing indirect forms of racial discrimination, such as policies that disproportionately exclude racialized groups and non-citizens from a living wage and decent working conditions. Article 5 of ICERD, guarantees without discrimination “(i) the rights to work, to free choice of employment, to just and favourable conditions of work, to protection against unemployment, to equal pay for equal work, to just and favourable remuneration.”<sup>93</sup>

**THE ILO AFFIRMS THE RIGHT TO A LIVING WAGE THAT ENSURES A DECENT STANDARD OF LIVING FOR WORKERS AND THEIR FAMILIES.**

87 ILO, Heat and OSH Policy Brief (previously cited). According to the ILO, “The goal of the WBGT threshold is to have a level of heat exposure that could extend over hours, where healthy adults can perform their typical work routine without a significant risk to their health”.

88 See: International Organization for Standardization, ISO 7243:2017. Ergonomics of the thermal environment — Assessment of heat stress using the WBGT (wet bulb globe temperature), available at:

<https://cdn.standards.iteh.ai/samples/67188/5a4c5553da5945aa872478c36755cded/ISO-7243-2017.pdf>

89 Amnesty International, “In the Prime of Their Lives”: Qatar’s Failure to Investigate, Remedy and Prevent Migrant Workers’ Deaths, Index No. MDE 22/4614/2021, August 2021, <https://www.amnesty.org/en/wp-content/uploads/2021/08/MDE2246142021ENGLISH.pdf>. For further discussion on the risks to workers of exposure to heat in the Gulf, see: FairSquare, *Killer Heat* (previously cited); and FairSquare, *Underlying Causes: Unexplained Migrant Worker Deaths in Saudi Arabia*, May 2025, [https://fairsq.org/wp-content/uploads/2025/05/FairSquare\\_Underlying-Issues-Report-May-2025.pdf](https://fairsq.org/wp-content/uploads/2025/05/FairSquare_Underlying-Issues-Report-May-2025.pdf); and Human Rights Watch, ‘Die first, I’ll pay you later’ (previously cited).

90 Interview conducted remotely, March 2025.

91 ILO, *Report of the Meeting of Experts on wage policies, including living wages*, 5 March 2024, pp.6-7,

<https://www.ilo.org/resource/gb/350/report-meeting-experts-wage-policies-including-living-wages> The preamble to the ILO constitution promotes the need for an adequate living wage and a 2024 ILO Meeting of Experts report on wage policies reaffirmed this.

92 ICESCR, article 7 and 11; and Committee on Economic, Social and Cultural Rights, General Comment No. 23 (2016) on the right to just and favourable conditions of work (article 7 of the International Covenant on Economic, Social and Cultural Rights), UN Doc. E/C.12/GC/23, para.18.

93 Article 5 (e)(i) of ICERD

Saudi Arabia does not guarantee any worker a minimum or living wage, per se. Nonetheless, in order for a Saudi national in the private sector to be counted in the government's Nitaqat, or Saudization, programme, which incentivizes businesses to hire more Saudi citizens in an effort to reduce unemployment amongst the population, they must be paid a minimum of SAR 4,000 (USD 1,066).<sup>94</sup> This effectively establishes a wage floor only for citizens, thereby excluding 75% of the workforce - over 13 million migrant workers – for whom any minimum pay levels depend mostly on negotiations between Saudi Arabia and their origin states. With differing levels of bargaining power and political will, this can lend itself to discriminatory outcomes, where some nationalities command better treatment and higher pay for the same jobs.<sup>95</sup>

Many of the foreign workers interviewed, who are racialized in the context of Saudi Arabia, complained about the low salaries they earned in Saudi Arabia, considering the type of work and hours they did. Indeed, they typically earned less than half of the de facto minimum wage for Saudi citizens, with basic monthly salaries under SAR 1,400 (USD 373) – including food and accommodation provided by their employer. Most held junior roles such as general labourers, cleaners or 'helpers', although a few interviewees who were in supervisor-level roles earned significantly more – up to SAR 5,000 (USD 1,333) per month.

 **SAUDI ARABIA'S NITAQAT PROGRAM SETS A WAGE FLOOR ONLY FOR CITIZENS – EXCLUDING OVER 13 MILLION MIGRANT WORKERS – MORE THAN 75% OF THE WORKFORCE.**

Some interviewees reported earning as little as SAR 1,000 (USD 266) per month, and a few who had worked on the Riyadh Metro project since 2015-16

reported it taking up to several years before they even reached that salary, having been paid between just SAR 700 and 800 (USD 186 – 213) each month when they first arrived in the country. Manish from Nepal described how he and hundreds of colleagues staged a protest at the work site of their main contractor employer, nine months after arriving in Saudi Arabia: **"The agreement paper mentioned that my basic monthly salary would be 1,000 riyals for eight hours of work, six days a week. In Saudi Arabia, the company people said my basic salary was 800 riyals (USD 213) ... workers protested as they didn't get the salary as they were promised."** Manish said that when the police came to "settle the issue", they in fact detained a few of the workers. Others, he said, **"ran away from the company to work elsewhere"**. It was only a year later that the company finally increased his salary to the promised SAR 1,000 riyals.<sup>96</sup>

Saudi Arabian law limits working hours to a maximum of eight hours per day or 48 per week, except in exceptional circumstances including where work is done in shifts and with authorisation from MHRSD.<sup>97</sup> Amnesty International could not find any such public authorization for the construction of the Riyadh Metro project, and MHRSD did not respond to the organization's request for clarification. Nonetheless, nearly everyone interviewed worked at least 60 hours per week, which is a breach of the labour law if the Ministry had not approved it. A few reported being forced to work daily overtime; some said this was "mandatory", with their contracts requiring overtime of 12 hours per week.<sup>98</sup> A few said that the transportation back to their accommodation was only provided after a 10-hour shift, meaning they felt there was no point in stopping work after eight hours, and indicating that there was an expectation from companies that employees would work longer.

Others, however, said that their basic salaries were just so low they felt no choice but to take on extra hours just to meet their basic needs and support their families. This sentiment was echoed by a supervisor in a main contractor on the Riyadh Metro project: **"workers are desperate"**, he told Amnesty.<sup>99</sup>

<sup>94</sup> Nitaqat is a nationalization programme designed to increase participation of Saudi citizens in the workforce which uses quotas requiring private sector companies to hire a certain percentage of Saudi nationals according to their size and industry.

<https://www.mei.edu/publications/bridging-cost-gap-three-labor-policies-close-wage-gap-between-saudi-and-foreign-labor#pt5> This wage floor was raised from SAR 3,000 to SAR 4,000 in 2023.

<sup>95</sup> For example, as of 2025 India has recommended a minimum salary for a general labourer of no less than SAR 1,700 per month - this was increased in 2025 after sitting at SAR 1,500 for the previous 10 years. Nepal's referral wage on the other hand has remained at SAR 1,000 plus SAR 300 food allowance for the same role since 2018, while Bangladesh's bilateral agreement with Saudi Arabia sets a minimum referral wage of SAR 800 (USD 213) for most migrant workers. See: Embassy of India in Riyadh, Saudi Arabia, <https://www.eoiriyadh.gov.in/page/referral-wages/> and Embassy of Nepal, "Minimum salary scale of Nepalese workforce in Kingdom of Saudi Arabia", <https://demand.nepalembassy.gov.np/assets/img/salaryinfo.pdf>; and The Business Standard, "Expat ministry proposes 1,000 riyal minimum wage for Bangladeshi workers in Saudi Arabia", 16 April 2024, <https://www.tbsnews.net/bangladesh/migration/expat-ministry-proposes-1000-riyal-minimum-wage-bangladeshi-workers-saudi>. For further discussion, see: Bina Fernandez, "Racialised institutional humiliation through the Kafala", Journal of Ethnic and Migration Studies, 2021, VOL. 47, NO. 19, p.4,353, <https://www.tandfonline.com/doi/epdf/10.1080/1369183X.2021.1876555?needAccess=true>

<sup>96</sup> Interview conducted remotely, October 2024.

<sup>97</sup> Nonetheless, average working hours over a three-week period must still not exceed eight hours per day or 48 hours a week. Labour Law, article 100. For more details see, MHRSD, "Actual Working Hours", 15 November 2019, <https://www.hrsd.gov.sa/en/knowledge-centre/articles/312>

<sup>98</sup> Interview conducted remotely, October 2024.

<sup>97</sup> Nonetheless, average working hours over a three-week period must still not exceed eight hours per day or 48 hours a week. Labour Law, article 100. For more details see, MHRSD, "Actual Working Hours", 15 November 2019, <https://www.hrsd.gov.sa/en/knowledge-centre/articles/312>

<sup>98</sup> This was confirmed by a contract for a construction worker for a multinational company seen by Amnesty International.

<sup>99</sup> Interview conducted remotely, February 2025.


Nabin, who worked 11 hours per day, and regularly also worked on his weekly rest day to supplement his income, explained that even with the additional overtime pay he struggled supporting his family. **“Due to the inflation in Nepal, this salary is too little to pay for household expenses,”** he explained, **“It vanishes as I pay for my children’s education and other household expenses. But what could I do? I have to manage”**.<sup>100</sup>

**“Working long hours is hard, so I suggest they increase the salary,”** said Sagar, who worked 60-hour weeks as an office assistant for a main contractor and earned the equivalent of less than USD 1.5 per hour, **“Our salary was low, and I was always pressured to earn more. But salary increase may reduce the pressure on the part of workers.”**<sup>101</sup>

Saudi Arabia’s failure to implement a universal minimum living wage perpetuates widespread low pay amongst foreign nationals, denying many workers and their families a decent standard of living. Further, while the government’s Saudization policy may appear to be a justifiable response to unemployment amongst the citizen population, the way it results in a de facto minimum wage protection for nationals, when set against the backdrop of a lack of broader protections for all workers, creates exclusions that disproportionately harm non-citizens – the vast majority of whom are racialized migrant workers of specific national and ethnic origin. These workers lack access to wage protection and are already at a heightened risk of exploitation under the country’s labour system in which race and nationality significantly shape the kind of work people do, the conditions they endure, and the value placed on their labour (see chapter 5).<sup>102</sup>

 **WORKERS’ SALARIES WERE SO LOW THEY FELT COMPELLED TO WORK AT LEAST 60 HOURS EACH WEEK.**

Saudi government figures show that foreign nationals earn an average of SAR 3,678 (USD 980) per month – less than one-third of the SAR 11,038 (USD 2,942) earned by Saudi nationals, and below the de facto minimum wage for citizens under the Nitaqat Program.<sup>103</sup> However, this average masks even greater disparities, as it includes all foreign workers, despite some nationalities tending to enjoy jobs with far higher wages and benefits than others. Amongst foreign nationals, for example, research consistently finds that racialized workers from South Asia and Africa are disproportionately concentrated in the lowest-paid, most physically demanding, and often dangerous jobs – frequently earning only a fraction of the de facto minimum wage.<sup>104</sup> The gap is stark: for example, Bangladeshi government data shows that its nationals in Saudi Arabia earn on average under SAR 800 per month – over ten times less than the average wage for Saudi citizens.<sup>105</sup>

 **THE FAILURE TO SET A UNIVERSAL LIVING WAGE ENTRENCHES LOW PAY AMONG MIGRANT WORKERS, DENYING MANY A DECENT STANDARD OF LIVING.**

The Committee on the Elimination of Racial Discrimination (CERD) clarifies that states must ensure that the implementation of legislation does not have a discriminatory effect on non-citizens and, that differential treatment based on citizenship constitutes discrimination if this differential treatment is not pursuant to a legitimate aim and not proportional to achieve that aim. Therefore, given the well-documented risks to migrant workers in Saudi Arabia and the disproportionate harm caused, the absence of a universal wage floor combined with the citizenship-based hiring structure (Nitaqat) can be considered discrimination in breach of the International Convention on the Elimination of all forms of Racial Discrimination to which Saudi Arabia is a party.<sup>106</sup> To ensure it is in compliance with its international law obligations, Saudi Arabia should establish and enforce a universal minimum living wage, sufficient to ensure a decent standard of living for all workers and their families, without discrimination based on race, nationality or migration status.

100 Interview conducted remotely, September 2024.

101 Interview conducted remotely, July 2024.

102 For further exploration of the discrimination inherent in this labour system, see chapter 3 of Amnesty International, *Locked In, Left Out: The Hidden Lives of Kenyan Domestic Workers in Saudi Arabia* (AI Index MDE 23/9222/2025), 12 May 2025, <https://www.amnesty.org/en/documents/mde23/9222/2025/en/>

103 Labour force data from Q1 2025 shows Saudis in the working age population are on average paid SAR 11,038 per month while foreign nationals earn SAR 3,687. These figures nonetheless obscure extreme disparities between ‘Western’ migrant workers and those from South and Southeast Asia and Africa. Central Authority for Statistics, Labour Market Statistics, Q1-2025, tab 6-1, available at: [https://www.stats.gov.sa/en/statistics-tabs/-/categories/417515?category=417515&tab=436312&utm\\_](https://www.stats.gov.sa/en/statistics-tabs/-/categories/417515?category=417515&tab=436312&utm_)

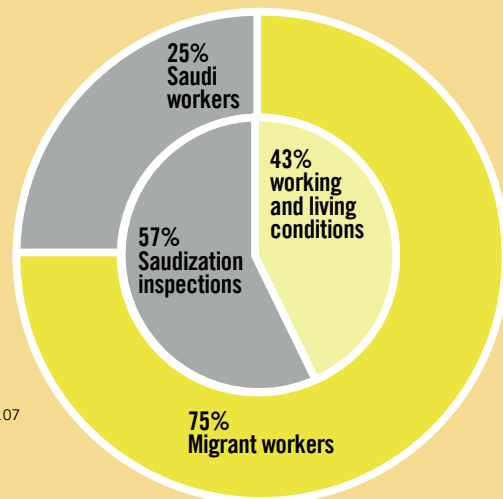
104 Amnesty International, *Locked In, Left Out* (previously cited), pp. 15 - 25.

105 Bangladesh Bureau of Statistics, *Bangladesh labour force survey 2022*, p.138, available at: <https://www.fairrecruitment.org/sites/default/files/2024-04/QLFS%202022.pdf>

106 Under the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), to which Saudi Arabia is a party, distinctions based on citizenship can amount to racial discrimination if they lack justification and proportionality. See CERD General Comment 30. At the 43rd session of the Human Rights Council in 2020, UN High Commissioner for Human Rights, said that “systemic racial discrimination extends beyond any expression of individual hatred” and “results from bias in multiple systems and institutions of public policy, which separately and together perpetuate and reinforce barriers to equality.” See: <https://www.ohchr.org/en/news/2020/06/43rd-session-human-rights-councilurgent-debate-current-racially-inspired-human-rights>.

## LABOUR INSPECTIONS AND PENALTIES

In 2025 Saudi Arabia updated its guidelines for labour inspections and occupational health and safety inspectors. Labour inspectors are authorized to enter work sites unannounced during working hours; examine relevant documents and inspect machinery and potentially hazardous materials, and question employers and employees to ensure compliance with the labour law. The guidelines mandate repeat visits if required, and state that inspections are focused on establishments with a “high rate of suspicion of violating the provisions of the Labor Law” and must examine all working conditions in the facility.<sup>107</sup> Where minor violations are detected, the employer will be given a warning and three days to rectify the issue before the breach will be reported. “Serious violations” will be recorded and liable to further investigation if the employer does not respond within three days.



The focus of labour inspections (centre circle) compared to labour force demographics in Saudi Arabia (outer circle).

According to the MHRSD, more than 912,000 field inspections were conducted across private sector establishments between January and mid-August 2025<sup>108</sup> – over double the number undertaken in 2018.<sup>109</sup> Despite migrant workers accounting for over 75% of the private sector workforce, more than 518,000 of these visits targeted companies’ compliance with the Saudization programme. This indicates a disproportionate focus on the nationalization effort compared to oversight of working and living conditions of the sector’s majority workforce. The inspections reportedly identified more than 250,000 breaches which were “primarily related to non-compliance with Saudization decisions”, although “several violations related to wage protection laws and delayed salary payments” were also detected. While the report states that the government issued “warning notices” to 98,000 establishments, it does not provide information on whether the government imposed any penalties, as provided by Saudi law (see below).<sup>110</sup> The government did not respond to the organization’s request for such information.

Similarly, in 2024, the ILO’s Committee of Experts on the Application of Conventions and Recommendations (CEACR) noted that the government had not provided it with data on “*enforcement measures and penalties, nor information disaggregated by nationals and non-nationals*” in relation to labour inspections, and requested it do so, alongside “*information on the time and resources of the labour inspectorate spent on activities aimed at verifying the legality of employment compared to activities spent on securing the enforcement of legal provisions relating to conditions of work and the protection of workers*”.<sup>111</sup> In prior observations, the Committee of Experts also noted that “*most labour inspection visits aimed at verifying the legality of the employment status of migrant workers compared with activities spent on securing the enforcement of legal provisions relating to conditions of work and the protection of workers.*”<sup>112</sup>

107 MHRSD, “Executive Regulations for Regulating and Organizing Labor Inspection Work”, 27 February 2025, available at: <https://www.hrsd.gov.sa/knowledge-centre/decisions-and-regulations/regulation-and-procedures/اللائحة-التنفيذية-للمصبط-أعمال-تفتيش-العمل-وتنظيمها> (accessed 29 August 2025).

108 MHRSD, “The Ministry has carried out more than 912,000 inspection tours since the beginning of 2025”, 31 August 2025, <https://www.hrsd.gov.sa/media-center/news/2025-أكثر-من-912-الف-جولة-رقابية-تمنذ-مطلع-2025>

109 ILO, Observation (CEACR) – adopted 2019, published 109th ILC session (2021) *Labour Inspection Convention, 1947 (No. 81)* – Saudi Arabia (Ratification: 1978),

[https://normlex.ilo.org/dyn/nrmlx\\_en/?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P13100\\_COUNTRY\\_ID:4023390,103208](https://normlex.ilo.org/dyn/nrmlx_en/?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4023390,103208)

110 MHRSD, “The Ministry has carried out more than 912,000 inspection tours since the beginning of 2025” (previously cited).

111 ILO, Observation (CEACR) – adopted 2024, published 113rd ILC session (2025) *Labour Inspection Convention, 1947 (No. 81)* – Saudi Arabia (Ratification: 1978),

[https://normlex.ilo.org/dyn/nrmlx\\_en/?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P13100\\_COUNTRY\\_ID:4399705,103208](https://normlex.ilo.org/dyn/nrmlx_en/?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4399705,103208)

112 ILO, Observation (CEACR) – adopted 2019, published 109th ILC session (2021), *Labour Inspection Convention, 1947 (No. 81)* – Saudi Arabia (Ratification: 1978),

[https://normlex.ilo.org/dyn/nrmlx\\_en/?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P13100\\_COUNTRY\\_ID:4023390,103208](https://normlex.ilo.org/dyn/nrmlx_en/?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4023390,103208)

Concerningly, since 2023 the Saudi government has significantly reduced administrative fines for violations of labour law and occupational health and safety standards, weakening protections for workers.<sup>113</sup> This has included reclassifying the denial of weekly rest days and breaches of working hour limits as “not serious” offences and reducing the penalty by up to 80% for such offences.<sup>114</sup> The penalty for passport confiscation was equally reduced, while that for breaches of the outdoor summer work ban was cut by two thirds.<sup>115</sup>

According to Saudi media, these changes were part of the government’s “ongoing endeavor to review labor market regulations, support the stability and growth of establishments, safeguard rights of workers, and increase the attractiveness and flexibility of the labor market.”<sup>116</sup> However, they in fact send a dangerous signal that labour rights are negotiable, and that breaches – however harmful – will be met with minimal consequences. The ILO CEACR, in its 2024 observations, expressed concern over the reductions and urged the government to “take the necessary measures” to ensure penalties are “sufficiently dissuasive to deter violations and are defined in proportion to the nature and gravity of the offence.” The CEACR also requested data on the number and nature of civil, administrative, and penal sanctions imposed.<sup>117</sup>

## 4.4 OTHER ABUSES

**“Our room was infested with bedbugs, making it difficult to sleep at night.”**

(Pawan, a carpenter from Nepal)

### LIVING CONDITIONS

While many of those interviewed said that their employer-provided accommodation was acceptable, several described their living quarters as overcrowded and unsanitary. Kamal said that his supply company-provided living quarters were, “**crowded...The room is narrow, and we have kept our personal bags and items here. So, it's dirty and messy.**”<sup>118</sup> Pawan, also hired by a supply company, said that they were eight sharing a small room without enough space to store their belongings, and that “**Even sitting down for a meal was difficult due to the cramped conditions.**” He and others also complained about the hygiene standards: “**Our room was infested with bedbugs, making it difficult to sleep at night. Bedbugs would crawl all over us while we slept.**”<sup>119</sup> A few others reported feeling that the water provided in their accommodation was not safe to drink and so they would have to buy their own bottled water.

113 In 2023, the government revised a previous 2021 table of penalties for violations of the labour law. Then, in May 2025, MHRSD announced a public consultation on further potential amendments to the penalties available, which resulted in the revised table being published in September the same year. See: MHRSD, Ministerial Decision No. 92768 dated 05/05/1443 (2021) (previously cited); and Ministerial Decision No. 75913 dated 19/5/1445 (2023) (previously cited); and MHRSD, Table of Violations and Penalties for the Labour Law and Its Executive Regulations After Amendment (2025) (previously cited. For further discussion of the consultation, see: Saudi Gazette, “MHRSD proposes amendments to table of Labor Law violations and penalties”, 11 September 2025, <https://www.saudigazette.com.sa/article/654897/SAUDI-ARABIA/MHRSD-proposes-amendments-to-table-of-Labor-Law-violations-and-penalties>

114 Reduced from a flat fine of SAR 5,000 (USD 1,332) per worker to a range of SAR 1,000–3,000 (USD 266–799) per worker, depending on the company size.

115 Reduced from SAR 3,000 (USD 799) per worker to just 1,000 (USD 266) per worker, irrespective of the company size.

116 Saudi Gazette, “Up to 94% cut in penalties for Labor Law violations”, 10 December 2023,

<https://www.saudigazette.com.sa/article/638558/SAUDI-ARABIA/Up-to-94-cut-in-penalties-for-Labor-Law-violations>.

117 ILO, Observation (CEACR) – adopted 2024, published 113rd ILC session (2025), Saudi Arabia, Hours of Work (Industry) Convention, 1919 (No. 1) (Ratification: 1978), Hours of Work (Commerce and Offices) Convention, 1930 (No. 30) (Ratification: 1978) Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106) (Ratification: 1978)

[https://normlex.ilo.org/dyn/nrmlx\\_en/?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P13100\\_COUNTRY\\_ID:4399808,103208](https://normlex.ilo.org/dyn/nrmlx_en/?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4399808,103208)

118 Interview conducted remotely, March 2025.

119 Interview conducted remotely, May 2025.

Saudi Arabia's 2021<sup>120</sup> and 2024<sup>121</sup> regulations on collective housing set minimum standards for shared accommodations, including those housing workers. Requirements include a minimum of 4m<sup>2</sup> of bedroom space per person (with no more than 10 occupants per room), at least one toilet and one bathroom for every eight residents, two kitchens per floor, and at least one communal area for dining and rest with 0.7m<sup>2</sup> of space per person. Bedrooms must have heating and air conditioning, safe and potable water must be readily available, and regular cleaning and pest control must be carried out. A full-time Saudi supervisor is required to oversee and ensure compliance with these standards for accommodations housing over 500 workers.

Despite these provisions, the complaints shared by some of the workers interviewed indicate that their living conditions either directly breach the regulations or suggest that the Saudi standards are so low that they fail in providing workers with “adequate and decent housing accommodation and a suitable living environment”,<sup>122</sup> as affirmed in international law and standards.<sup>123</sup> By way of comparison, for example, Qatar's Supreme Committee for Delivery and Legacy limited shared bedrooms for those on World Cup projects to a maximum of four beds (singles, not bunks) per room, with at least 6m<sup>2</sup> floor space per worker, including storage, and one toilet for every six people.<sup>124</sup>

 **SOME WORKER COMPLAINTS SUGGEST THEIR LIVING CONDITIONS BREACH REGULATIONS – OR THAT SAUDI STANDARDS ARE TOO LOW TO ENSURE “ADEQUATE AND DECENT” ACCOMMODATION AND LIVING ENVIRONMENTS.**

## INADEQUATE FOOD

Most of the workers interviewed said their companies provided food for them. While a few described the meals as satisfactory, many criticized the poor quality and lack of variety. Baburam worked as a pipe fitter between 2018 and 2024. He explained that their meagre meals would improve when inspections of their work sites were undertaken, suggesting these were announced to the company in advance allowing them time to temporarily ensure compliance with standards: **“During the checking months, they would give Pepsi, fruits, cakes, biryani, etc. But the rest of the time, they would give simple lentils, vegetables, and rice.”**<sup>125</sup>

Concerningly, some workers reported that food provisions varied according to staff rank, noting that senior staff received better food in both quality and variety compared to general labourers. Aakash, who worked for a main contractor since 2022, said:

**“They would prepare different foods for different types of workers. Supervisors or staff in other senior positions would get excellent food. They could eat anything they want. They could eat fruits, milk, juice, meat, fish, etc. I’m an office boy, so I was considered a junior worker. Three types of food were available there: for labourers, for juniors, and for seniors. Who would listen to us?”**<sup>126</sup>

Such differential treatment had a profound effect on workers, with Pradeep recalling how this made him feel: **“I found it disturbing. I felt bad. But what to do? They have made such a system. But I think workers should be able to access good food, regardless of their position of work”.**<sup>127</sup>

120 These include the provision of a clean environment with regular pest control management; at least 4m<sup>2</sup> of bedroom space per person; sufficient and safe water suitable for drinking; hot and cold water for bathing; heating and cooling air conditioning units throughout the property; and a cooking stove and refrigerator. For more details see, Ministry of Municipal and Rural Affairs and Housing, *2021 Guidelines on Conditions of Collective Housing*, pp.3-7, 14-19, <https://momah.gov.sa/sites/default/files/2024-04/dlyl-alshrwt-alshyt-walfnyt-walslamt-allazm-twafrha-fy-alsakn-aljmayt-llafrad-.pdf>

121 Ministry of Municipal and Rural Affairs and Housing, Ministerial Decision No. 4500763245/1 - 1445 AH on “Health, technical, and safety requirements for collective housing for individuals”, 3 March 2024, <https://momah.gov.sa/sites/default/files/2024-04/dlyl-alshrwt-alshyt-walfnyt-walslamt-allazm-twafrha-fy-alsakn-aljmayt-llafrad-.pdf>

122 The ILO Workers' Housing Recommendation 115 further emphasizes that workers' accommodation must also offer “structural safety and reasonable levels of decency, hygiene and comfort”. See, Workers' Housing Recommendation No. 115, Part VI, para. 19. This, the ILO clarifies, requires individual beds; ample supply of safe water; adequate sanitary facilities, ventilation and heating; and common dining and recreation rooms, among other things. Workers' Housing Recommendation No. 115, Suggestions Concerning Methods of Application, Part I, para. 8, [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:R115](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R115)

123 Article 25 of the Universal Declaration of Human Rights (UDHR) and Article 5 of ICERD which affirms the right to an adequate standard of living, including decent housing, food, water, and sanitation.

124 Supreme Committee for Delivery and Legacy, *Workers' Welfare Standards, Edition two*, Pp.54-55,

[https://www.workerswelfare.qa/sites/default/files/documents/Workers-Welfare-Standards-Qatar-2022-EN\\_0.pdf](https://www.workerswelfare.qa/sites/default/files/documents/Workers-Welfare-Standards-Qatar-2022-EN_0.pdf)

125 Interview conducted remotely, June 2024.

126 Interview conducted remotely, October 2024.

127 Interview conducted remotely, November 2024.



↑ Migrant workers are seen at a construction site near Riyadh on 3 March 2024 © Jaap Arriens/NurPhoto/Getty Images

## PASSPORT CONFISCATION

Saudi Arabian law prohibits the confiscation of passports and residence permits and attaches a penalty of SAR 1,000–3,000 (USD 266–799) per worker, depending on the company's total number of employees – reduced from SAR 5,000 (USD 1,333) in 2023, as mentioned above.<sup>128</sup> Nonetheless, a few workers interviewed said that their companies held their passports throughout their employment. Manish, an office help for one of the main contractors since 2016, said: **“I don’t have a passport with me. My company holds the workers’ passports. If we want to go home, we have to inform them one month before”**.<sup>129</sup> Chandra, who spent seven years on the project noted that his company did not explain why they took workers’ passports away: **“Perhaps they think workers run away. The company people give the passports back to the workers in the airport when returning home in the final exit”**.<sup>130</sup>

The retention of identity documents is not just a breach of Saudi law but also of international law and standards and is an indicator of forced labour if workers cannot gain access to them on demand and if they believe that leaving their job could risk them losing the documents.<sup>131</sup>

## DIFFERENTIAL TREATMENT

Several of the workers employed by labour supply companies told Amnesty International that they were treated more harshly than their colleagues who were working directly for the main contractors on the Riyadh Metro project – they were given the more difficult tasks, were expected to work harder, faced more pressure from supervisors and felt they had low job security, making it even harder to complain, they said. Pawan, explained:

**“There is a significant difference between working for a supply company and being a direct company employee in Saudi Arabia. Direct company workers are assigned easier tasks, whereas**

128 See: MHRSD, Ministerial Decision No. 92768 dated 05/05/1443 (2021) (previously cited); and Ministerial Decision No. 75913 dated 19/5/1445 (2023) (previously cited); and MHRSD, Table of Violations and Penalties for the Labour Law and Its Executive Regulations After Amendment (2025) (previously cited).

129 Interview conducted remotely, October 2024.

130 Interview conducted remotely, November 2024.

131 ILO Convention 29 on Forced Labour, Article 2(1).

**supply company workers must do the most difficult jobs. If we refuse to work as instructed, they can release [fire] us immediately, leaving us with no choice but to comply with their demands.”<sup>132</sup>**

A few said that they felt this was because the main contractors pay a lot to supply companies for their labour and so expect more from the workers in return – a sentiment that Amnesty International has documented in previous research on Saudi Arabia.<sup>133</sup> **“The main contractor gives a lot of money to the supply company, so we have to work a lot”,** said Bishnu, whose employer supplied workers to one of the main contractors, **“For example, supply companies like ours receive 5,000–6,000 (USD 1,333 – 1,600) riyals per person [per month] from the main contractor. Since [the main contractors] have paid a lot of money for us, they expect us to work very hard... we are paid very little.”<sup>134</sup>**

One supervisor employed by a main contractor on the Riyadh Metro project confirmed this approach to Amnesty International:

**“The main contractors want the results and progress from their investment into the supply companies. That’s why these workers are pushed and pressured a lot at work. As a supervisor, I have to supervise scaffolders from both direct companies and supply companies. If I don’t have enough scaffolders, I ask the senior staff to fulfil the human resources. Then they bring the scaffolders from the subcontracting or supply companies. Then, I have to make them work. My senior staff ask me to ‘push’ these workers at work. Because our company pays big money to the supply companies for sending their workers to us, that’s why our company wants to make them work hard. So, naturally, I must push the workers a bit to get the results. Otherwise, my company questions me why progress is slow.”<sup>135</sup>**

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<sup>132</sup> Interview conducted remotely, February 2025.

<sup>133</sup> See, for example: Amnesty International, *‘Don’t worry, it’s a branch of Amazon’* (previously cited).; and Amnesty International, *‘I would fear going to work’* (previously cited).

<sup>134</sup> Interview conducted remotely, January 2025.

<sup>135</sup> Interview conducted remotely, January 2025.

# 5. THE KAFALA SYSTEM AND ITS LIMITED REFORMS

Despite limited reforms introduced through the Labour Reform Initiative (LRI) since 2021,<sup>136</sup> Saudi Arabia's kafala sponsorship system remains largely intact, continuing to govern the lives of over 13.4 million migrant workers.<sup>137</sup> The system binds foreign workers to their employer, who acts as their official "sponsor" (or kafeel) from the moment they enter the country and throughout their employment. To enter and be able to work in the country, migrant workers still need their employer to sponsor their visa and issue and renew their residence permit. Employers also retain excessive control over workers' legal status, job mobility, and ability to leave the country, making them highly vulnerable to abuse, exploitation, and forced labour.<sup>138</sup> It effectively absolves the state of responsibility for protecting workers' rights and reinforces a deeply unequal power dynamic between employers and foreign employees.

These ongoing abuses have prompted international scrutiny and action. For example, in June 2024, the Building and Wood Workers' International (BWI), a global trade union, filed a landmark complaint at the International Labour Organization (ILO), accusing Saudi Arabia of violating ILO conventions on forced labour, wage theft, and freedom of association. A year later, the International Trade Union Confederation (ITUC), led by ITUC-Africa, submitted a second complaint documenting a widespread pattern of forced labour, wage theft, physical and sexual abuse, and systemic racism particularly – though not exclusively – affecting African migrant workers.<sup>139</sup>

Exacerbating the situation, Saudi Arabia enforces highly repressive policies that restrict freedom of expression, association, and assembly, preventing migrant workers from forming or joining trade unions or engaging in collective bargaining to improve their conditions.<sup>140</sup> As a result, in 2024 the ITUC downgraded

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<sup>136</sup> MHRSD, "Ministry of Human Resources and Social Development Launches Labor Reforms for Private Sector Workers", 4 November 2020, <https://www.hrsd.gov.sa/en/media-center/news/770957>

<sup>137</sup> According to KSA General Authority for Statistics, there are 18.8 million (58.4%) Saudi nationals and over 13.4 million (41.6%) non-Saudi nationals working primarily in the private sector. For more details, see the Register-based Labour Market Statistics- Q1, 2025, <https://www.stats.gov.sa/documents/20117/2435273/Register-based+Labour+Market+Statistics-+Q1+2025+EN+%281%29.xlsx/a6e354c1-4b81-8bb8-788a-0fd4e3ca22b1?t=1751144483051>

<sup>138</sup> See Amnesty International, *'Don't worry, it's a branch of Amazon'* (previously cited); and Amnesty International, *'I would fear going to work'* (previously cited); and Amnesty International, *Locked in, left out:* (previously cited).

<sup>139</sup> International Trade Union Confederation, "Trade unions take Saudi Arabia to UN labour body over exploitation and deaths of migrant workers", 4 June 2025, <https://www.ituc-csi.org/Trade-unions-take-Saudi-Arabia-to-UN-labour-body>

<sup>140</sup> For an overview of the current human rights situation in Saudi Arabia, see Amnesty International, "Saudi Arabia 2024", <https://www.amnesty.org/en/location/middle-east-and-north-africa/middle-east/saudi-arabia/report-saudi-arabia/>. According to the ILO, "trade unions are not explicitly prohibited in Saudi Arabia but they do not exist in practice. However, the Labour Law permits the establishment of worker councils for Saudi nationals only", see ILO, "Regulatory Framework Governing Migrant workers", November 2019, [https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/legaldocument/wcms\\_728262.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/legaldocument/wcms_728262.pdf). Since 2021, there have been worker committees for Saudis employed in some large state entities such as Aramco, see "Law forming Work Committees, 2001 AD", <http://www.ncar.gov.sa/Documents/Details?Id=7ifAYfcmWXPpEzGmxYFg%3D%3D>

Saudi Arabia in its annual Global Rights Index, classifying it as a country where fundamental labour rights are not guaranteed.<sup>141</sup>

The kafala system also enables retaliation against workers who lodge complaints or attempt to change jobs. Employers can arbitrarily cancel residency permits, stripping workers of their legal status and exposing them to immediate risk of arrest, detention, and deportation. Indeed, thousands are detained and deported weekly for breaching residency regulations, yet protections to ensure due process remain unclear, especially for those rendered irregular due to their employer failing to renew their residence permit.<sup>142</sup> Amnesty International could not find any publicly available information on measures taken against abusive employers, and the government did not respond to Amnesty International's request for clarification.

## 5.1 RESTRICTIONS ON FREEDOM OF MOVEMENT

One of the first initiatives introduced by the MHRSD through the LRI was to allow most migrant workers to leave the country either temporarily or permanently after requesting their own exit permit.<sup>143</sup> While the Ministry suggests that this means workers now enjoy freedom of movement and can exit without their employer's permission,<sup>144</sup> in reality employers continue to be informed of workers' requests and retain the right to "lodge an inquiry" into them within 10 days, before the government approves or rejects the worker's request to leave.<sup>145</sup>

During field research in Nepal in 2023, Amnesty International interviewed dozens of workers who had recently returned from employment in Saudi Arabia. None of the interviewees were aware that they were legally entitled to leave the country without employer approval. All reported that their employers had managed the paperwork and obtained their exit permits prior to departure, indicating workers' continuing dependence on their employers and minimal direct involvement by the employees themselves.<sup>146</sup>

**BETWEEN 2021 AND 2023, ONLY 618 FOREIGN WORKERS RECEIVED EXIT PERMITS WITHOUT EMPLOYER CONSENT.**

These findings are consistent with reports from other human rights organizations, which have noted that, in practice, most employers continue to apply for exit permits on behalf of their workers, significantly limiting the number of workers who apply for the permits independently.<sup>147</sup> In fact, according to the US State Department's 2023 Trafficking in Persons (TiP) report, only 618 foreign workers were granted an exit permit without their employer's permission since the LRI reform in 2021.<sup>148</sup> No further official figure has been released since.

141 ITUC, "Democratic workers' rights crumbling: 2024 ITUC Global Rights Index", 12 June 2024, <https://www.ituc-csi.org/ituc-globalrights-index-2024>

142 See for example posts on Ministry of Interior X's account, <https://x.com/MOISaudiArabia>; and for example, Saudi Gazette, "18,673 residency, labor, and border law violators arrested in one week", 4 October 2025, <https://www.saudigazette.com.sa/article/655525/SAUDI-ARABIA/18673-residency-labor-and-border-law-violators-arrested-in-one-week>

143 MHRSD, User Guide for the Services Offered by the Contractual Relationship Improvement Initiative (User Guide), 2021, copy on file with Amnesty International, p. 16.

144 Okaz, "A labor market free of defects... flexibility in movement... and no restriction on worker's freedom, No sponsorship system, but a contractual relationship", 12 March 2021, <https://www.okaz.com.sa/news/local/2061247>

145 MHRSD, User Guide (previously cited), p. 16.

146 Amnesty International, "Don't worry, it's a branch of Amazon" (previously cited).

147 See for example, Human Rights Watch, *Die First, and I'll Pay You Later* (previously cited); and BHRRC, "We were treated as if we were machines" (previously cited).

148 US Department of State, 2023 Trafficking in Persons Report: Saudi Arabia, <https://www.state.gov/reports/2023-trafficking-in-persons-report/saudi-arabia/>

## 5.2 CONTROLS ON JOB MOBILITY

The LRI has also increased job mobility for workers covered by the labour law, a category that excludes domestic workers and certain other groups.<sup>149</sup> Now, workers covered by the labour law are in theory able to switch jobs without their employer's permission under specific conditions: after completing one year of their contract, upon contract expiry, or in a few other limited circumstances.<sup>150</sup> Otherwise, they still require the approval of their current employer to change jobs. The transfer process is initiated by the prospective new employer through the Qiwa platform – the country's online labour service portal<sup>151</sup> – and approved by the employee. Upon submission, the current employer is automatically notified.<sup>152</sup>

The government has not released official figures on job transfers. However, the 2024 TiP Report states that between March 2023 and April 2024, 305,444 foreign workers changed jobs without their employer's consent.<sup>153</sup> The report does not indicate how many workers requested transfers in total, how many switched jobs with employer approval, or how this compares to previous years before the LRI was introduced. It also lacks breakdowns by profession or nationality, making it unclear which groups have benefited most or whether job mobility has meaningfully improved in practice.

Despite the changes, employers continue to be able to weaponize the system to control migrant workers' freedom of movement and job mobility.<sup>154</sup> Research published by Human Rights Watch found that workers tend to face retaliation from employers when wanting to change jobs. For example, employers may issue an exit permit for the worker, making it impossible for them to change job, or accuse the worker of a criminal offence such as theft. Such accusations trigger legal proceedings that must be resolved before the worker can proceed with the transfer, effectively blocking their ability to change jobs.<sup>155</sup>

Most migrant workers Amnesty International interviewed for this report had not even tried to change employer, with some saying they did not believe that their company would allow this. One who did try, however, explained that his supply company refused to authorize a job transfer when he requested it after completing his contract in 2024. He felt it all depends on the company in question:

**“Our company didn’t let us change employers, so we were compelled to continue working here. In Saudi Arabia, some companies allow workers to change employers, but ours is really a bad company. Only good companies allow workers to change employers. This is a supply company constantly looking for cheap labourers, so why would it allow workers to change jobs?”<sup>156</sup>**

Additionally, in a push to digitalize its services, the government introduced Absher in 2010, an online platform aiming at facilitating access to citizens, residents and visitors to services provided by the Ministry of Interior,<sup>157</sup> and Qiwa in 2019. However, recent research showed that these platforms did little to address the power dynamics between workers and employers due to weak oversight, lack of employer compliance, limited government enforcement, and workers' difficulties in accessing these systems, often due to language barriers, low awareness, and limited technological skills.<sup>158</sup>

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149 For more details about the situation of domestic workers in Saudi Arabia including the legal framework governing them see, Amnesty International, *Locked in, left out* (previously cited).

150 These include for instance: if their work permit has not been issued within 90 days of entering Saudi Arabia or has not been renewed, or if the worker has not been paid for three consecutive months. For more details see MHRSD, *User Guide* (previously cited), pp. 5-6. Also, the Labour Law, which is applicable to all nationals and most foreign workers, stipulates that all workers can leave their job without serving their notice in various circumstances, including “if the employer fails to fulfil his essential contractual or statutory obligations towards the worker”. However, other regulations applicable to foreign workers, including the Labour Reform Initiative, continue to restrict migrant workers' ability to change jobs without their employer's permission.

151 In 2019, the government introduced Qiwa to manage labour-related service such recruitment and employment of both nationals and foreigners – but not domestic workers – with the aim of facilitating administrative processes.

152 For more details see MHRSD, *User Guide* (previously cited), pp. 6.

153 US Department of State, 2024 Trafficking in Persons Report: Saudi Arabia, <https://www.state.gov/reports/2024-trafficking-in-persons-report/saudi-arabia/>

154 Migrant-Rights.org, “Saudi’s Labour Reform Initiative: An Overview”, 3 November 2024, <https://www.migrant-rights.org/2024/11/saudis-labour-reform-initiative-an-overview/>

155 Human Rights Watch, *‘Die First, and I’ll Pay You Later’* (previously cited).

156 Interview conducted remotely, February 2025.

157 Absher, <https://www.absher.sa/portal/landing.html>, accessed 15 August 2025.

158 See for example, Migrant-Rights.org, “Saudi’s Labour Reform Initiative: An Overview”, 3 November 2024; and Human Rights Watch, *‘Die First, and I’ll Pay You Later’* (previously cited).



© A foreign labourer works in Riyadh's soaring temperatures on 16 June 2022. © FAYEZ NURELDINE/AFP/Getty Images

## 5.3 “ABSENCE FROM WORK”

A key element of the Kafala system which persists in Saudi Arabia and across the Gulf is the ability of employers to unilaterally report foreign workers as being “absent from their work” without permission – previously known as “absconding”. This designation effectively strips the worker of their legal right to stay in the country and leaves them highly vulnerable to arrest and deportation.<sup>159</sup>

One of the most concerning aspects of the “absconding” charge has been its misuse by abusive employers as a form of retaliation when workers request job changes, seek a final exit visa, or submit a labour complaint. This often leads to the loss of workers' legal status while allowing employers to avoid paying overdue salaries or end-of-service benefits.<sup>160</sup> The lack of robust government oversight and accountability in investigating these claims is a significant concern. Instead of determining whether workers are escaping abusive conditions or if the charges are retaliatory in nature, the system frequently defaults to punishing the worker with minimal scrutiny of the employers' allegations.

In 2022, the government introduced a new regulation aimed at curbing the misuse of “absconding” reports by employers against migrant workers, which was subsequently further amended in 2025.<sup>161</sup> Instead of filing such cases, employers can now request to terminate a worker's employment and mark them as “discontinued from work” if the worker has a residence permit (known as *Iqama* in Arabic) valid for at least 60 days and no active employment contract exists at the time of submission. Under this system, workers are not immediately criminalized but have 60 days to find a new employer, leave the country or renew their

159 See ILO, White Paper, *Employer-Migrant Worker Relationship in the Middle East: Exploring scope for internal labour market mobility and fair migration*, March 2017, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@arabstates/@ro-beirut/documents/publication/wcms\\_552697.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@arabstates/@ro-beirut/documents/publication/wcms_552697.pdf); see also Migrant-Rights.org, *Huroob, Runaway, Absconding: Trapping migrants in extreme abuse*, 30 September 2020, <https://www.migrant-rights.org/2020/09/huroob-runaway-absconding-trapping-migrants-in-extreme-abuse/>

160 US Department of State, 2024 Trafficking in Persons Report: Saudi Arabia, (previously cited).

161 See Saudi Gazette, “Qiwa sets 60-day window before reporting worker as absent under new contract rules”, 31 July 2025, <https://saudigazette.com.sa/article/653810/SAUDI-ARABIA/Qiwa-updates-employment-rules-on-worker-absence-and-contract-termination>

contract with the current employer.<sup>162</sup> After this period, however, if no action is taken, the worker is classified as “absent from work,” putting them at risk of arrest and deportation for irregular status.<sup>163</sup>

Assessing the impact of these reforms remains difficult due to the lack of both data and access to the country. In May 2024, the MHRSD announced that over one million migrant workers had benefited from the LRI services since its launch. However, it provided no details about which specific services were accessed or a demographic breakdown of the beneficiaries.<sup>164</sup> The government also failed to respond to Amnesty International’s repeated requests for more detailed information.

In the interviews with Amnesty International, several workers expressed their fears of speaking out on the issues they faced while employed on the Riyadh Metro, citing the ease with which they felt their employer could dismiss them, refrain from renewing their iqama, or report them as having absconded if they did so, reflecting the power imbalances inherent in the system. **“We were there to work”, said Bikram, “we could have faced problems if we argued with anyone on anything. So, I never tried to complain about anything.”**

**SEVERAL WORKERS SAID THEY FEARED SPEAKING OUT ABOUT CONDITIONS ON THE RIYADH METRO, CITING RISKS OF DISMISSAL, NON-RENEWAL OF THEIR IQAMA, OR BEING REPORTED AS ABSCONDED.**

Indeed, the impact on workers who face such administrative challenges at the hands of their employer under the kafala system can be profound and heightens their vulnerability to further exploitation. For example, Pawan, explained that when his labour supply company failed to renew his residence permit, he was rendered undocumented and unable to secure new employment. As a result, he said he became homeless, and on some nights **“had no choice but to sleep under the open sky in a park”**. He sought help from various individuals, but was further taken advantage of, undertaking work for which he was never paid, he said. Today, he “works independently” as a day labourer and is at risk of being arrested and deported if detected by the authorities: **“employers pick us up from this spot for work. On the days I find work, I earn about SAR 80 (USD 21). However, there is no job security—I may or may not get work on any given day.”**<sup>165</sup>

## SAUDI ARABIA’S INTERNATIONAL OBLIGATIONS

Saudi Arabia is not a party to several key international human rights treaties which protect migrant workers’ rights, such as the International Covenant on Economic, Social and Cultural Rights (ICESCR), the International Covenant on Civil and Political Rights (ICCPR), as well as the International Convention on the Protection of the Rights of All Migrant Workers.<sup>166</sup>

Saudi Arabia is a party to the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), which commits it to guaranteeing the enjoyment of rights without discrimination including “The right to freedom of movement and residence within the border of the State”, and “Economic, social and cultural rights, in particular: (i) The rights to work, to free choice of employment, to just and favourable conditions of work, to protection against unemployment, to equal pay for equal work, to just and favourable remuneration; (ii) The right to form and join trade unions”.<sup>167</sup>

Saudi Arabia is also a party to the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime (Palermo Protocol).<sup>168</sup>

<sup>162</sup> Saudi Gazette, “Qiwa sets 60-day window before reporting worker as absent under new contract rules” (previously cited).

<sup>163</sup> See MHRSD, “Ministry of Human Resources and Social Development Updates Controls and Procedures for Worker Absence from Work in Private Sector Establishments”, 23 October 2023, <https://www.hrsd.gov.sa/media-center/news/1170537>; see also US Department of State, 2024 Trafficking in Persons Report: Saudi Arabia (previously cited).

<sup>164</sup> Saudi Gazette, “MHRSD: 1 million workers benefit from initiative to improve contractual relationship”, 12 May 2024, <https://www.saudigazette.com.sa/article/642799>

<sup>165</sup> Interview conducted remotely, February 2025.

<sup>166</sup> For further details of Saudi Arabia’s international legal obligations and the status of core treaty ratifications, see: *‘Don’t worry, it’s a branch of Amazon’* (previously cited), pp. 36-39.

<sup>167</sup> Article 5 of ICERD.

<sup>168</sup> Saudi Arabia is also a state party to the Convention on the Elimination of All Forms of Discrimination Against Women, the Convention on the Rights of the Child and the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

Further, Saudi Arabia, as a UN member, is expected to uphold human rights standards<sup>169</sup> and adhere to the Universal Declaration of Human Rights (UDHR), which sets out a range of civil, economic and social rights that apply to the violations and abuses documented in this report and is widely viewed as having customary international law status.<sup>170</sup> Additionally, Saudi Arabia is a state party to the Arab Charter on Human Rights, which upholds and reaffirms fundamental human rights principles as enshrined in the UDHR.

Saudi Arabia has ratified 16 ILO conventions, including those on forced labour and discrimination. In particular, Saudi Arabia is a party to the ILO's Forced Labour Convention, the Abolition of Forced Labour Convention, the Discrimination (Occupation and Employment) Convention, and the Worst Forms of Child Labour Convention. It has also ratified the Labour Inspection Convention, though it has not ratified conventions on freedom of association and collective bargaining, or minimum wage.<sup>171</sup> Nonetheless Saudi Arabia must still uphold all fundamental labour principles due to its ILO membership.<sup>172</sup>

Saudi Arabia is obliged to protect workers from being exploited by companies operating in its territory, by taking appropriate measures to prevent human rights abuses by private actors and proactively monitoring and investigating these abuses when they occur; holding perpetrators to account; and ensuring effective remedy for harm caused.<sup>173</sup>

SAUDI ARABIA: RATIFICATION STATUS OF CORE HUMAN RIGHTS TREATIES		
International Covenant on Civil and Political Rights (ICCPR)		NOT SIGNED OR RATIFIED
International Covenant on Economic, Social and Cultural Rights (ICESCR)		
UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol)		
International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families (MWC)		RATIFIED WITH RESERVATIONS
International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)		
International Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)		
International Convention on the Rights of the Child (CRC)		
International Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT)		SIGNED/RATIFIED
Convention on the Rights of Persons with Disabilities (CRPD)		

<sup>169</sup> Charter Of the United Nations, article 55-56.

<sup>170</sup> See for example, William A. Schabas, The Customary International Law of Human Rights, Chapter 9, Oxford Academic, June 2021, <https://academic.oup.com/book/39904/chapter-abstract/340150337?redirectedFrom=fulltext>

<sup>171</sup> ILO, Ratifications for Saudi Arabia, [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=1000%3A11200%3A0%3A%3ANO%3A11200%3AP11200\\_COUNTRY\\_ID%3A103208](https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000%3A11200%3A0%3A%3ANO%3A11200%3AP11200_COUNTRY_ID%3A103208)

<sup>172</sup> ILO, Declaration on Fundamental Principles and Rights at Work and its Follow-up Adopted at the 86th Session of the International Labour Conference (1998) and amended at the 110th Session (2022), para 2, [https://www.ilo.org/sites/default/files/2024-04/ILO\\_1998\\_Declaration\\_EN.pdf](https://www.ilo.org/sites/default/files/2024-04/ILO_1998_Declaration_EN.pdf)

<sup>173</sup> The right to remedy encompasses the victim's right to equal and effective access to justice, and adequate, effective and prompt reparation for the harm suffered. See Article 6 of ICERD; Articles 13, 12 and 23 of the Arab Charter. The right to remedy is also guaranteed by Article 23 of the UDHR.

# 6. CONCLUSION AND RECOMMENDATIONS

This report shows that, even on one of its flagship government-led infrastructure projects, the government of Saudi Arabia failed to protect the rights of the migrant workers who made it possible, allowing legal loopholes to persist and enforcing existing laws only weakly. The construction sector – overwhelmingly reliant on migrant workers and a cornerstone of the government’s delivery of its giga projects – is particularly exposed to these abuses.

The near-universal accounts of excessive – and often illegal – recruitment fees from migrant workers interviewed by Amnesty International expose the stark gap between rhetoric and reality. They show that despite Saudi Arabia and origin countries such as Bangladesh, India and Nepal, formally recognizing the harm caused by such fees and adopting measures to restrict them, the practice remains entrenched, driving workers deeper into debt and heightening their risk of exploitation. Equally, companies hiring people from abroad continue to ignore this practice, profiting from the labour of these indebted migrant workers, some of whom had also been misled about their terms of employment and working conditions.

Though most of the companies employing workers interviewed for this report complied with Saudi Arabia’s summer midday work ban, the workers’ testimonies highlight the ban’s sheer inadequacy. Indeed, they show how the government’s failure to take a risk-based approach, mandate compulsory rest periods and complete work stoppages during other periods of extreme heat and humidity left the men at risk of heat stress and other serious health impacts.

Finally, some of those interviewed were paid so little that they struggled to meet their families’ basic needs at home, pushing many to accept hours beyond the legal limit. While the government provides minimum income thresholds to encourage Saudi nationals to join the workforce, these protections do not extend to migrant workers. Without a universal minimum wage, migrant workers – many of whom are racialized – are left unprotected. This exclusion, combined with significantly lower wages, results in disproportionate harm and amounts to racial discrimination.

The companies building the Riyadh Metro and other infrastructure have their own independent responsibility to take proactive, sustained measures to safeguard the rights of those across their value chain – and government shortcomings only make such action more pertinent than ever. The nature of Saudi Arabia’s labour system combined with the broader lack of human rights protections places migrant workers at high risk of abuse, while effective due diligence is further constrained by the country’s repressive environment and the construction sector’s heavy reliance on multiple layers of subcontractors and intermediaries, fuelling and obscuring exploitation in value chains.

This context underscores how vital it is for companies operating in Saudi Arabia to conduct continuous human rights due diligence, paying particular attention to these risks and adopting mitigation measures proportionate to the likelihood and severity of harm. Where risks cannot be adequately addressed or companies are unwilling to do so, these businesses should consider ceasing operations.

Ultimately, the abuses uncovered on one of the country’s largest state-led infrastructure projects – undertaken with the participation of leading international construction companies – should stand as a warning for all current and future mega-projects, particularly as construction continues at pace in preparation for the 2034 FIFA World Cup.

In light of these findings, and with the aim of continuing to improve migrant workers' rights in Saudi Arabia, especially those working in the construction sector, Amnesty International makes the following key recommendations:

## TO THE GOVERNMENT OF SAUDI ARABIA

### INVESTIGATIONS

- ▶ Conduct an independent and impartial investigation into the abuses detailed in this report, ensure redress to the victims, hold perpetrators to account and publicly report on the findings.

### LABOUR MIGRATION SYSTEM

- ▶ Dismantle the kafala sponsorship system entirely, including by eliminating employer control over migrant workers' ability to change jobs or leave the country, and reducing workers' dependence on employers for their legal status.
- ▷ Take steps to increase awareness among migrant workers – in languages they can understand – of their rights in the country, the recent labour reforms and how they can access available redress mechanisms if they face abuse.

### RECRUITMENT FEES

- ▶ Strictly enforce the prohibition on worker-paid recruitment fees by actively investigating and prosecuting Saudi-based recruitment agents and employers who violate the law.
- ▷ Require companies to provide evidence that they have covered the full cost of recruiting migrant workers and penalize those who do not do so.
- ▷ Require companies to provide budgets for recruitment costs throughout their contracting chain in all public procurement bidding processes.

### HEALTH AND SAFETY

- ▶ Guarantee safe working conditions for all, including by adopting a risk-based approach to heat protections.
- ▶ Mandate all employers to provide outdoor workers with breaks of an appropriate duration, in cooled, shaded areas, when there is an occupational risk of heat stress; mandatory break times should take into account the environmental heat stress risks along with the exertional nature of the work being performed.

### WAGES

- ▶ Establish and enforce a universal minimum living wage, sufficient to ensure a decent standard of living for all workers and their families, without discrimination based on race, nationality or migration status.

### DISCRIMINATION

- ▶ Take proactive steps to prevent disproportionate impacts of lower wages on racialized people and eliminate indirect racial discrimination.
- ▶ Collect and make public comprehensive up to date statistics on the country's demographic composition, based on the principle of self-identification, disaggregated by race, national or ethnic origin, migration status and employment sector.
- ▶ Carry out research and collect data to understand and address discriminatory harms resulting from laws, policies and practice – including the kafala sponsorship system – on racialized people.

## **LABOUR INSPECTIONS**

- ▶ Effectively enforce labour laws and regulations, including through regular, unannounced inspections of work sites and worker accommodation, and investigation and prosecution of employers who breach these.
- ▷ Ensure that penalties are sufficiently stringent to deter breaches and reflect the nature and severity of the offence.

## **ACCESS TO JUSTICE**

- ▶ Ensure accessible, effective, and independent mechanisms for workers to seek timely justice and remedy without fear of retaliation.

## **TRANSPARENCY**

- ▶ Collect and make public detailed data on:
  - ▷ Implementation of key aspects of the labour reforms initiative, including changes to the exit permit and employer-change regime, disaggregated by nationality, gender and sector.
  - ▷ labour inspections and penalties, disaggregated by nationality, sector, whether announced or unannounced, and whether proactive or in relation to a labour complaint.
  - ▷ wages, disaggregated by nationality, gender, sector, and role-type.

## **INTERNATIONAL OBLIGATIONS**

- ▶ Ratify outstanding core human rights and labour conventions including the International Covenant on Civil and Political Rights and its Optional Protocols; International Covenant on Economic, Social and Cultural Rights and its Optional Protocol; International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; and all the ILO Core conventions and other relevant ILO conventions.

## **TO CONSTRUCTION COMPANIES OPERATING IN SAUDI ARABIA, INCLUDING THOSE ENGAGED ON THE RIYADH METRO PROJECT**

- ▶ Implement comprehensive human rights due diligence processes across all operations and value chain, including by:
  - ▷ conducting thorough human rights risk assessments focusing particular attention on migrant workers' rights, health and safety standards.
  - ▷ establishing robust grievance mechanisms that are accessible, confidential, and effective, so that workers can report abuses without fear of retaliation.
  - ▷ implementing rigorous and regular monitoring and inspection mechanisms, with a special focus on subcontractors and labour suppliers - to ensure compliance with human rights law for issues such as pay, overtime, living and working conditions.
- ▶ Where adequate due diligence cannot be undertaken or risks effectively mitigated or companies are unwilling to do so, consider ceasing operations and withdrawing from the business relationship.
- ▶ Play an active and direct role in recruitment, ensuring all workers are fully aware of the terms and conditions of their jobs and are not charged any recruitment fees or associated costs.
- ▶ Where a business is found to have caused or contributed to human rights abuses in its value chain, ensure these are remediated in an effective and timely manner, including through compensation and guarantees of non-repetition.
- ▶ Implement robust occupational health and safety measures: ensure full compliance with Saudi Arabia's heat protection laws and regulations and empower workers to take appropriate rest breaks and other measures to mitigate the risk of heat stress; provide workers with adequate housing, access to healthcare, and nutritious food to ensure the right to health of workers is respected.

- ▶ Publicly disclose human rights policies, due diligence processes, and outcomes of audits and investigations and how these have been tailored to address the risks particular to this context.

## **TO THE GOVERNMENTS OF WORKER ORIGIN COUNTRIES, INCLUDING BANGLADESH, INDIA AND NEPAL**

- ▶ Bring laws and policies on recruitment in line with international standards by enacting and enforcing a prohibition on worker-paid recruitment fees and related costs.
  - ▷ Where laws are in place, ensure their full implementation, strengthen monitoring mechanisms, penalize breaches and provide accessible redress for migrant workers.
- ▶ Monitor, investigate and sanction the illegal conduct of recruitment businesses and local agents – including those who charge recruitment fees or engage in deceptive practices – and ensure that those who breach regulations face appropriate penalties.
- ▶ Increase embassies' capacity to monitor the treatment of migrant workers and provide legal aid and other assistance to those who experience abuse abroad.
- ▶ Ensure that all migrant workers have access to an effective complaint mechanism through which they or their families can seek redress if they were made to work under exploitative conditions.
- ▶ Strengthen existing bilateral labour agreements with Saudi Arabia and effectively monitor their enforcement, working in partnership with the Saudi Arabian authorities to ensure that workers are protected from exploitation and enjoy decent work and pay.

**AMNESTY INTERNATIONAL  
IS A GLOBAL MOVEMENT  
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WHEN INJUSTICE HAPPENS  
TO ONE PERSON, IT  
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# **“NOBODY WANTS TO WORK IN THESE SITUATIONS”**

## **A DECADE OF EXPLOITATION ON THE RIYADH METRO PROJECT**

Behind the gleaming façade of the newly opened Riyadh Metro lies a decade of labour exploitation. This report documents the experiences of some of the migrant workers who built one of Saudi Arabia’s flagship infrastructure projects. Through interviews and legal analysis, Amnesty International reveals how workers from Bangladesh, India and Nepal endured excessive recruitment fees, low and discriminatory wages, unsafe conditions in extreme heat, and inadequate housing – all while under the enduring control of the kafala sponsorship system.

Despite limited reforms, employers retain sweeping power over workers’ legal status and mobility, enabling abuse. The report exposes failures by the Saudi government to protect migrant workers and highlights serious human rights risks for companies operating in the construction sector.

As Saudi Arabia prepares to host the 2034 FIFA World Cup and construction booms as it expands its mega-project portfolio, Amnesty calls for urgent action to dismantle abusive labour systems and enforce laws effectively – ending the culture of impunity that allows exploitation to flourish.