

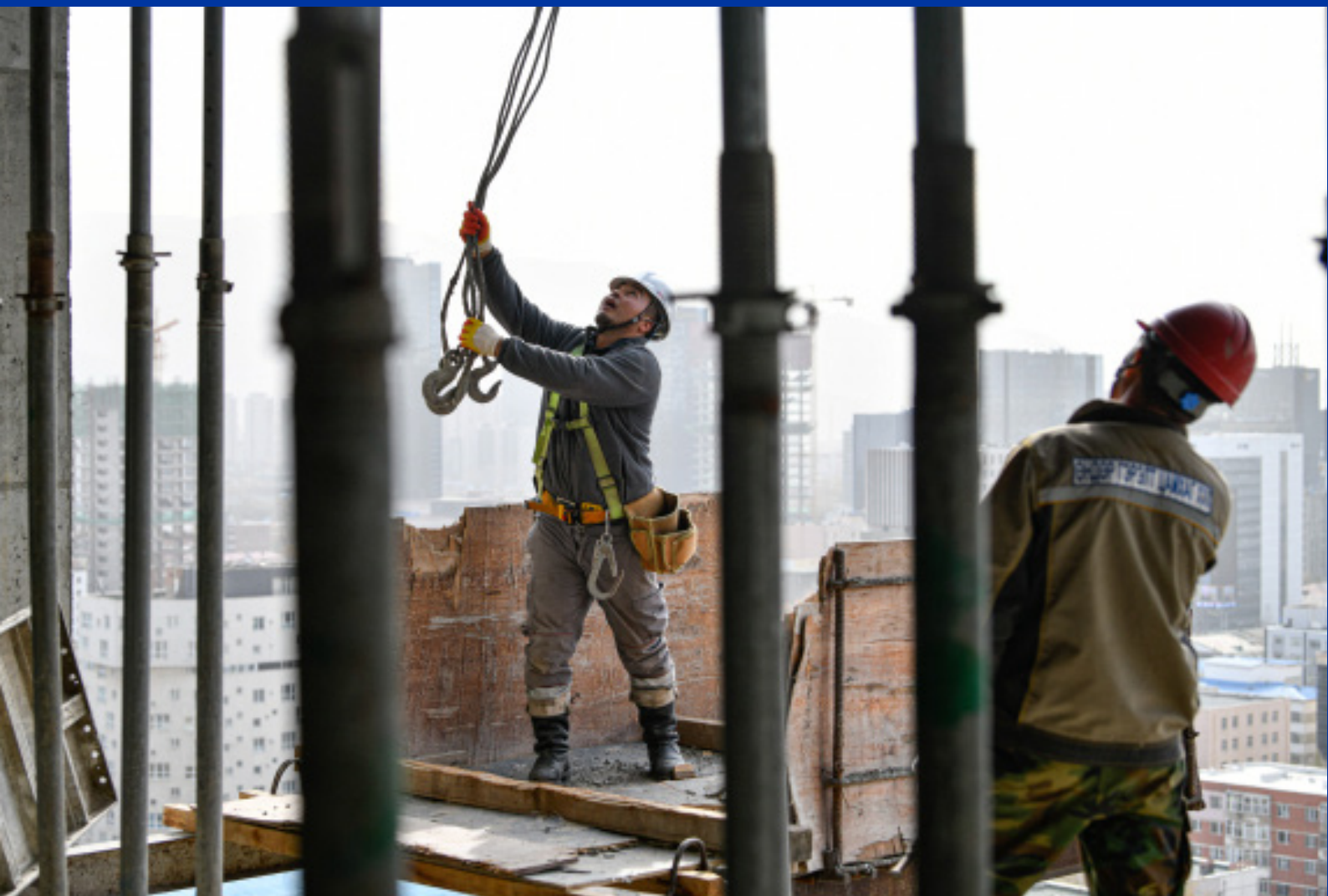


International
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NATIONAL RESEARCH AND
CONSULTING CENTER

► **Labour conditions in Mongolia's
construction sector:**
Insights from mixed-method research



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construction sector:
Insights from mixed-method
research**



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ISBN: 9789220429686 (print); 9789220429693 (web PDF)

DOI: <https://doi.org/10.54394/INMA2972>

Also available in Mongolian: Монгол Улс дахь барилгын салбарын хөдөлмөрийн нөхцөлийн судалгаа, ISBN 9789220429709 (print); 9789220429716 (web PDF)

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► Acknowledgements

This study was coordinated by Maria Gabriella Breglia (ILO FUNDAMENTALS) and conducted by the National Research and Consulting Center (NRCC). The NRCC team included Altantsetseg Batchuluun, Soyolmaa Batbekh, Khishigsaikhan Batchuluun, Enkh-Ochir Batbold, Khunshagai Batjargal and Ariunaa Chilkhaasuren.

The study also benefited from valuable inputs from Lkhagvademberel Amgalan (ILO Country Office for China and Mongolia), Anna B. Kis (FUNDAMENTALS), Alain Pelce (ILO DWT-Bangkok) and Rosinda Silva (ILO NORMES).

► Table of contents

List of tables	6
List of figures	7
► 1.Introduction.....	8
► 2.Background.....	10
2.1.The construction industry and its workforce: An overview	10
2.1.1.Characteristics of workers	13
► 3.Methodology	15
3.1.Profile of the sampled entities	15
3.2.Quantitative component.....	17
3.2.1.Structured interviews with employees	17
3.2.2.Structured interviews with employers	18
3.3.Qualitative component.....	19
3.3.1.Semi-structured interviews with selected employees and employers	19
► 4.Data collection process	21
4.1.The research team	21
4.2.Training and oversight	21
4.3.Quantitative data collection	22
4.4.Qualitative data collection.....	22
4.5.Data accuracy.....	23
4.6.Ethical considerations.....	24
4.7.Challenges in data collection.....	24
► 5.Working conditions in the construction sector	26
5.1.Characteristics of jobs in the construction sector and tasks	25
5.1.1.Contracting	30
5.1.2.Working time.....	33
5.1.3.Earnings	35
5.2.Occupational safety and health	39
5.3.Employee survey	40
5.4.Employer survey.....	47
5.5.Forced labour	48
5.5.1.Forced labour based on international standards	49
5.5.2.Forced labour based on national legislation	50
5.5.3.Involuntariness	51
5.5.4.Coercion	52

5.5.5.Trafficking for forced labour	54
5.5.6.Characteristics of the perpetrator	56
5.5.7.Reporting	56
5.6.Recruitment	57
5.7.Freedom of association and collective bargaining.....	59
▶ 6.Conclusions	61
▶ 7. Recommendations	64
▶ 8. References	65
▶ 9. Appendix	66

► List of tables

Table 1. Number of entities and workers in the construction sector, by province	12
Table 2. Interviewed employers and workers, by location	15
Table 3. Characteristics of the interviewed entities.....	16
Table 4. Characteristics of the entities in the sample	16
Table 5. Employee profile by characteristics of the construction entity	16
Table 6. Characteristics of the sampled workers.....	17
Table 7. Characteristics of the sampled employers	18
Table 8. Semi-structured interviews: Characteristics of the employers and workers.....	19
Table 9. Employment type by demographic characteristics.....	27
Table 10. Employment type by employer's characteristics	28
Table 11. Contractual status by employee characteristics.....	30
Table 12. Contractual status by employers' and work characteristics	31
Table 13. Contractual status according to employers' survey	31
Table 14. Contractual status by employers' paid benefits	33
Table 15. Daily working hours and weekly working days.....	34
Table 16. Monthly wage, by workers' and employment characteristics	36
Table 17. Payment schedule, by workers and employment characteristics	38
Table 18. Inclusion of OSH standards in contractual arrangements, by type of entity and contractor.....	47
Table 19. Forced labour based on international standards, by demographic characteristics...	49
Table 20. Forced labour based on international standards by employers' and work characteristics.....	50
Table 21. Working conditions, by status in forced labour based on international standards	50
Table 22. Involuntary work conditions, workers in forced labour	51
Table 23. Types of coercion faced by workers in forced labour.....	53
Table 24. Trafficking for forced labour	54
Table 25. Trafficking for forced labour, by demographic characteristics.....	55
Table 26. Trafficking for forced labour by employers' and work characteristics.....	56
Table 27. Reasons for not reporting	57

► List of figures

Figure 1. Distribution of small and medium-sized enterprises, by employment size, 2023	10
Figure 2. Construction sector: employment.....	11
Figure 3. Structure of the construction sector in Mongolia	13
Figure 4. The age structure of construction workers, 2023	14
Figure 5. Main tasks (count), by type of contract.....	29
Figure 6. Delay in payment of wages, by workers' and employment characteristics	39
Figure 7. Who workers report to when something happens on site	41
Figure 8. Provision of OSH-related assessments and training, by type of entity and location	41
Figure 9. Use of protective gear, by education level.....	43
Figure 10. Use of protective gear, by employment characteristics	44
Figure 11. Provision of protective gear, by provider	45
Figure 12. Provision of instructions for using protective gear, by employment characteristics.....	46
Figure 13. Involuntary work, by workers' characteristics	51
Figure 14. Job-search methods of employees	58
Figure 15. Job-search methods of employees, by forced labour status	59
Figure 16. Presence of active trade unions in the workplace, by region and type of business	59
Figure 17. Is the worker in a trade union?	60

► 1. Introduction

Mongolia renewed its commitment to prohibit and eliminate forced labour in 2005 by ratifying the two fundamental International Labour Organization (ILO) Conventions on forced labour – Forced Labour Convention, 1930 (No. 29) and Abolition of Forced Labour Convention, 1957 (No. 105). Since then, the country has implemented concrete measures to bring national laws into greater conformity with these Conventions.

In 2022, the National Statistics Office of Mongolia (NSO), with support from the ILO, piloted a module in the Labour Force Survey to assess the existence and prevalence of forced labour in the country. The survey revealed the existence of forced labour in the private sector, with an estimated 3,600 adults in forced labour (or 2 in every 1,000 adults) at some point during a three-year reference period. However, the survey does not capture individuals residing outside the household, such as workers living in their place of work or in institutional housing or migrants, who are more vulnerable to being trapped in forced labour, nor does it provide estimates of forced labour by sector.¹

To address this information gap, a national consultation was held in March 2024 to identify research priorities for advancing national efforts to combat forced labour, which led to the identification of forced labour in the construction sector as a key area of concern.

Construction is the third highest-risk sector for forced labour globally, with an estimated 2.8 million construction workers in forced labour around the world, representing 16.3 per cent of all adults in forced labour.²

Limited information exists about forced labour in the construction sector in Mongolia. A scoping study indicates that youth, assistant workers and part-time employees, and migrants are particularly at risk of forced labour in the construction sector and that bonded labour often arises in relation to subcontracting practices among assistant workers.³ Moreover, previous reports indicate that tens of thousands of Chinese construction and mining workers entered Mongolia on tourist visas through a Chinese labour agency and were sold to Mongolian employers, with their passports confiscated on arrival.⁴ According to the National Human Rights Commission of Mongolia, 3 of the 182 complaints relating to labour rights concerned forced labour in 2023. In addition, the Business and Human Rights National Baseline Assessment⁵ found that that 81 per cent of online survey participants in the construction sector did not receive payment for working overtime and 69 per cent were not paid on time.

Against this backdrop, the ILO supported research on working conditions in Mongolia's construction sector to assess compliance with Convention No. 29.

The research adopted a mixed-method approach and does not provide representative estimates of forced labour in the construction sector. However, it does allow a comprehensive understanding of the working conditions.

¹ NSO, *Mongolian Labour Force and Forced Labour Survey 2022: Final Report*, 2024.

² ILO, Walk Free and International Organization for Migration (IOM), *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, 2022.

³ ILO, "Scoping Study Related to Forced Labour in Mongolia" (unpublished).

⁴ ILO, *Mongolia Policy Brief: Forced Labour*, 2016; CEACR, *Comments (ilo.org)*, 2022.

⁵ https://globalnaps.org/wp-content/uploads/2024/02/BHR-NBA-in-Mongolia-report-2022.ENG_.pdf

The results indicate the presence of forced labour, with 32 out of 220 surveyed workers meeting the international criteria for forced labour⁶. The research also highlights the persistence of child labour, exploitative working conditions and low levels of compliance with occupational safety and health (OSH) standards, particularly in the informal sector. This situation is exacerbated by enforcement gaps and by the workers' lack of trust in the authorities and their belief that exploitative conditions are a characteristic of the construction industry. Unionization is nearly absent, especially among informal workers, limiting workers' capacity to advocate for their rights and push for better working conditions.

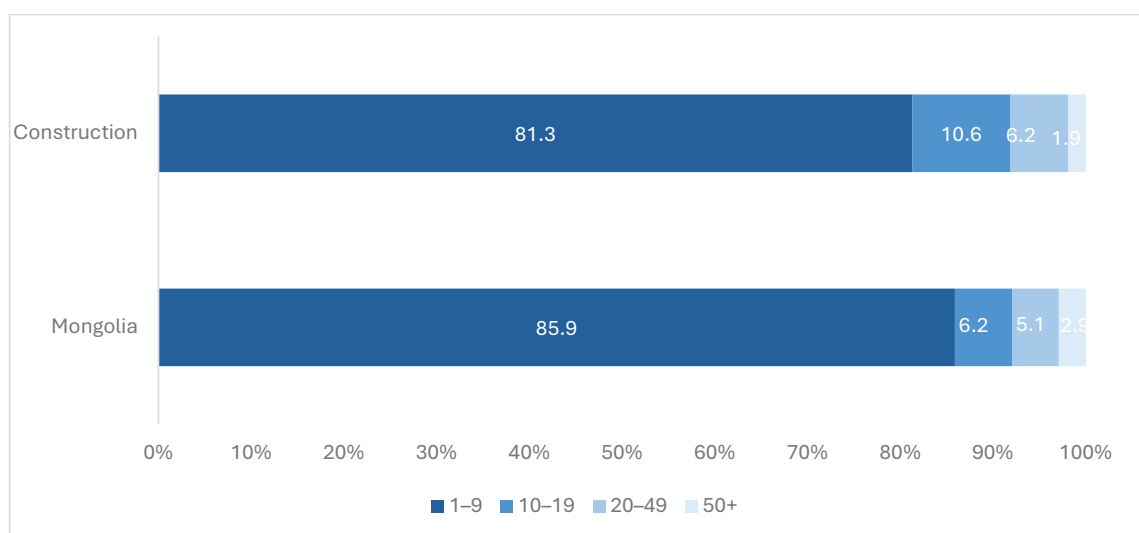
⁶ The criteria for forced labour can be accessed by the following link, <https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/what-forced-labour>

► 2. Background

2.1. The construction industry and its workforce: An overview

According to the NSO, there were 79,821 workers and 8,280 entities in the construction sector in 2023. The construction sector employs 6.1 per cent of the Mongolian labour force and 15.6 per cent of the foreign workers in Mongolia. The sector represents 8.6 per cent of the total entities and is dominated by small entities with fewer than 10 workers (81.3 per cent), followed by entities with between 10 and 19 workers (10.6 per cent) (figure 1).

Figure 1. Distribution of small and medium-sized enterprises, by employment size, 2023

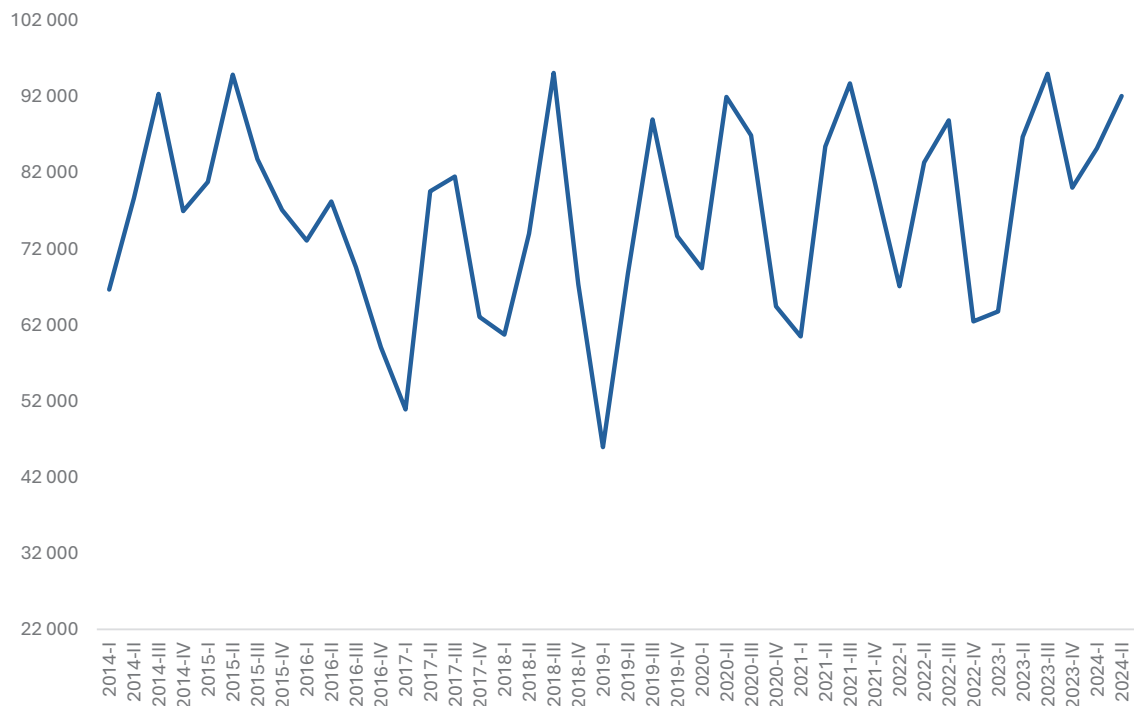


Source: NSO (National Statistics Office of Mongolia). 2023. Mongolian Statistical Information Service. www.1212.mn

As shown in figure 2, the construction sector is highly seasonal, with a peak in activities in the second and third quarters and slowing down in the first and fourth quarters. In 2023, for example, the employment level in the third quarter was 95,027 while in the first quarter it was 63,776. Moreover, the construction sector workers work longer hours during the warmer months.⁷

⁷ UNDP, [Business and Human Rights National Baseline Assessment](#), 2022.

Figure 2. Construction sector: employment (by worker count)



Source: NSO (National Statistics Office of Mongolia). 2023. Mongolian Statistical Information Service. www.1212.mn

The construction sector is highly concentrated in Ulaanbaatar, which accounts for more than four fifths of entities and three quarters of workers (table 1).

Table 1. Number of entities and workers in the construction sector, by administrative province

	Entities		Workers	
	No.	%	No.	%
Ulaanbaatar	6 857	82.64	61 394	74.80
Orkhon	201	2.42	2 334	2.84
Darkhan-Uul	137	1.65	3 443	4.19
Umnugobi	120	1.45	217	0.26
Bayankhongor	106	1.28	1 541	1.88
Khovd	99	1.19	1 417	1.73
Ovorkhangai	87	1.05	1 244	1.52
Khovsgol	77	0.93	1 264	1.54
Dornod	76	0.92	548	0.67
Uvs	73	0.88	1 409	1.72
Bayan-Olgii	63	0.76	1 611	1.96
Tov	61	0.74	872	1.06
Khentii	53	0.64	263	0.32
Zavkhan	51	0.61	485	0.59
Dornogovi	44	0.53	342	0.42
Govi-Altai	37	0.45	662	0.81
Selenge	36	0.43	643	0.78
Arkhangai	35	0.42	964	1.17
Bulgan	27	0.33	381	0.46
Sukhbaatar	24	0.29	157	0.19
Dundgovi	20	0.24	358	0.44
Govisumber	13	0.16	527	0.64
Mongolia	8 297	100	82 076	100

Source: NSO (National Statistics Office of Mongolia). 2023. Mongolian Statistical Information Service. www.1212.mn

Subcontracting practices are common in the construction sector worldwide⁸ and Mongolia is no exception, as confirmed by the experts interviewed.

The wide use of subcontracting often leads to a lack of clarity regarding the roles and responsibilities of contractors with consequent implications for workers, such as increased vulnerability to exploitation, weaker labour protections and benefits, and precarious employment and job insecurity. The sector has at least three hierarchical layers: general contractors, special contractors with special permits and subcontractors (figure 3). A *general contractor* is a company that signs a contract with the client to undertake a construction project and assumes full responsibility for the entire construction process. Depending on the number of employees and the scale of the project, the general contractor may also appoint subcontractors. *Special contractors with special permits* are companies with specific licences to perform specialized tasks, such as plumbing, electrical and other technical work. Some *subcontractors*, especially small brigades, operate without a special licence. At the bottom of the contractual arrangement system, there are brigades

⁸ R.M. Choudhry et al., "Subcontracting Practices in the Construction Industry of Pakistan", *Journal of Construction Engineering and Management* 138, No. 12 (2012): 1353–1359; A.H. Abdullah, "Review of Subcontracting Practice in the Construction Industry", *Journal of Environmental Sciences and Resources Management* 6, No. 1 (2014): 23–33.

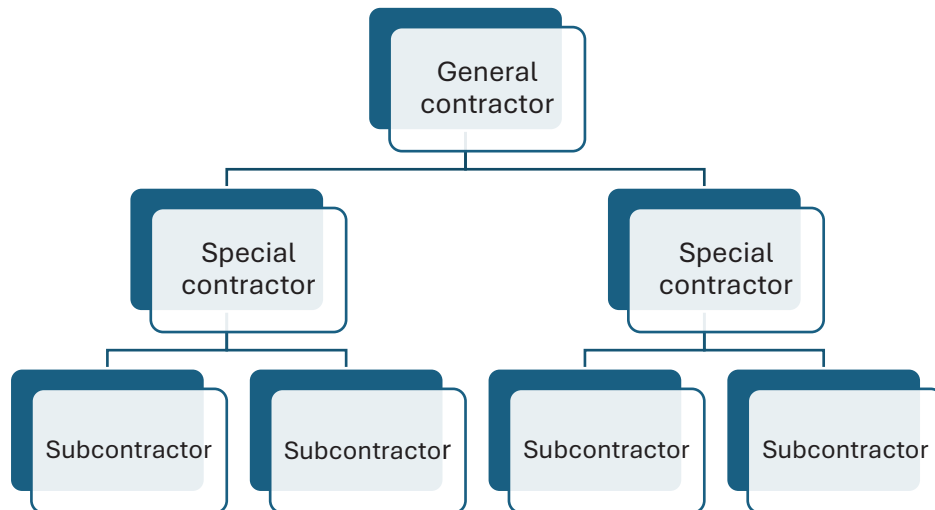
– informal units with an average of four members (although they can have 10–20 members), involved in all types of construction activities, such as masonry, carpentry, plumbing, welding and carcass installation.⁹ Being informal units, they do not pay any taxes or social insurance¹⁰ and experts interviewed reported that workers are particularly vulnerable to labour rights violation and exploitative conditions.

One of the most pressing issues in the construction sector is the contracts made with subcontractors. Large construction companies win tenders as general contractors and then hire a subcontractor, who in turn hires another subcontractor. A single construction project may involve nearly 100 subcontractors, with different individuals handling various tasks such as walls, electrical work and flooring. This situation often leads to unclear responsibilities among construction companies.

For instance, if a subcontractor gets into an accident, disputes arise over who should be held accountable. In an attempt to address this issue, amendments were made in 2015 to the Labour Safety and Hygiene Law.¹¹ According to the new provision in law, the contract must specify which party – the general contractor or subcontractor – is responsible for labour safety and hygiene matters. If the contract does not explicitly state this, the responsibility falls on the general contractor who initially signed the agreement with the client.

*Head of the Labour Inspection Department of the Ministry of Family,
Labour and Social Protection*

Figure 3. Structure of the construction sector in Mongolia



2.1.1 Characteristics of workers

Male workers dominate in the construction sector, representing 82.9 per cent and 83.1 per cent of the total workforce in 2022 and 2023, respectively. This gender bias is due to stereotyping, inadequate provision of segregated sanitary facilities, and informal and family-networked hiring procedures.¹²

⁹ Carcass refers to the main framework/structure of a building, which includes the load-bearing structure but excludes flooring, roofing, windows and so on.

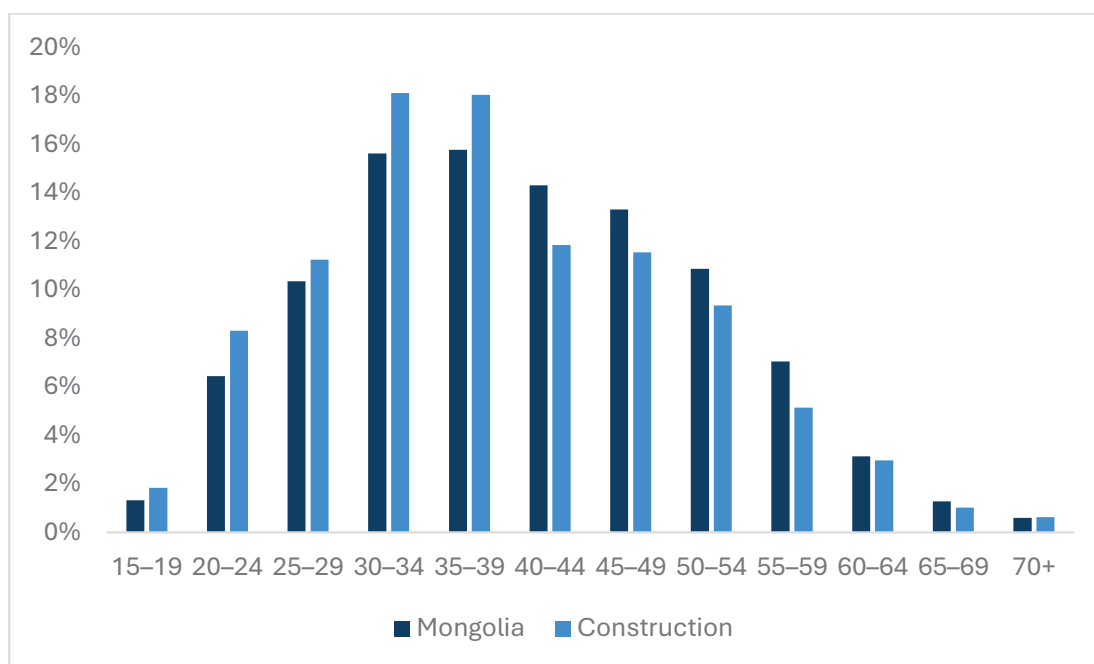
¹⁰ Geres, [Creating a Database for the Micro, Small and Medium-sized Enterprises and Brigades Operating in the Construction Sector of Ulaanbaatar City in Mongolia](#), 2019.

¹¹ Article 28.3 of the Labour Safety and Hygiene Law, 2015.

¹² GIZ, ["It's a Man's World"? How to Overcome Gender Bias in the Mongolian Construction Sector](#), 2021.

The construction sector employs more young workers (15–25 years old) than the national average (10.1 per cent in the construction sector and 7.8 per cent, on average, in Mongolia) and adolescents (15–19 years old) (1.8 per cent) (figure 4). In this regard, it is important to be aware that the construction sector is prohibited from employing minors,¹³ therefore this figure indicates the presence of child labour in the construction sector.¹⁴

Figure 4. The age structure of construction workers, 2023



Source: NSO (National Statistics Office of Mongolia). 2023. Mongolian Statistical Information Service. www.1212.mn

¹³ Decree A/122 by the Minister of Labour and Social Protection, 10 June 2022.

¹⁴ ILO Minimum Age Convention, 1973 (No. 138) and the Worst Forms of Child Labour Convention, 1999 (No. 182) define child labour as employment below the minimum age as established in national legislation, hazardous unpaid household services and the worst forms of child labour.

► 3. Methodology

The research adopted a mixed-method approach. Exploratory research, involving desk reviews and interviews with key informants,¹⁵ gathered information crucial to the research design, ensuring a comprehensive and context-sensitive research framework, aligned with international measurement standards and best practices.

Quantitative data were collected across 41 construction entities from 220 workers using a structured questionnaire and from 41 employers via a short survey. While not statistically representative of the construction sector, these surveys provide valuable insights into working conditions in the construction sector: the entities were selected from different administrative provinces, or aimags, and with different characteristics, as explained in section 3.1. Qualitative data were collected through in-depth interviews with 9 employers and 36 employees (table 2). Moreover, detailed field notes and observations added depth to the analysis and helped to cross-validate the findings.

Table 2. Interviewed employers and workers, by location

	Employers: no.		Workers: no.	
	Survey	In-depth interview	Survey	In-depth interview
Ulaanbaatar	30	5	150	26
Orkhon	5	2	35	5
Umnugobi	6	2	35	5
Total	41	9	220	36

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The fieldwork took place over a six-week period, from 7 October to 13 November 2024, ensuring its completion before the weather became too cold for the construction sector to continue to operate. In Orkhon and Umnugobi provinces, the research team conducted interviews in five entities over a two-week period, from 7 October to 17 October 2024. In Ulaanbaatar, the research covered a larger sample size, comprising 30 entities, and took place between 7 October and 13 November 2024.

3.1 Profile of the sampled entities

As indicated in section 2, the overwhelming majority of entities and workers in the construction sector are found in Ulaanbaatar, followed by Orkhon, Darkhan-Uul and Umnugobi.

Darkhan-Uul and Orkhon are the second and third largest cities, respectively, with similar characteristics in terms of location (in the north of the country), settlement history and population density. Umnugobi, in contrast, is a newly urbanized settlement and many construction projects have been implemented there recently. Therefore, we selected Ulaanbaatar, Orkhon (as it has more entities in the construction sector than Darkhan-Uul)

¹⁵ The key informants comprised two researchers with specialized knowledge on issues related to forced labour in Mongolia; eight experts from government agencies with mandates in labour, migration and the construction sector, as well as recruitment agencies, employers' and workers' organizations, social workers and non-governmental organizations focused on migrant workers' rights and welfare; key stakeholders from relevant institutions (the head of the Ministry of Family, Labour and Social Protection's Labour Inspection Department and the chairman of the Construction Sector Trade Union).

and Umnugobi for inclusion in the survey.

This approach ensured that the survey captured a variety of regional and urban dynamics, offering valuable insights into the varying experiences of employers and workers in the construction industry.

We mainly focused on the construction of public building projects (such as libraries, service buildings and schools), commercial and residential buildings. In Mongolia, these types of construction works are common and typically require a large workforce, therefore providing greater opportunities to detect cases of forced labour.

Entities were selected to ensure a variety of contractual arrangements and institutional settings, with 30 entities being limited liability companies (LLCs) and 11 informal brigades (table 3). On average, entities were established in 2014.

Table 3. Characteristics of the interviewed entities

Location	Type of entity	Observations	Mean years of experience
Orkhon	Informal brigades	2	4.5
	LLC	3	17.5
Ulaanbaatar	Informal brigades	9	5.8
	LLC	21	10.7
Umnugobi	LLC	6	11.5
Total	Informal brigades	11	5.5
	LLC	30	11.3

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

Out of the 41 entities, 25 have a special licence for construction work, with an average of 3.9 permits (table 4). Moreover, 19 general contractors and 3 subcontractors use subcontractors, with an average of 3.3 subcontractors (Table A1).

Table 4. Characteristics of the entities in the sample

	Observations
General contractors	24
Special contractors	1
Subcontractors	16
Of which, informal brigades	11
Total	41

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

General contractors have the highest number of employees (24.7), with an average of 14.7 permanent workers and 10.1 temporary workers. Special contractors rely heavily on temporary workers, averaging 10 temporary workers out of their 13 employees. Subcontractors employ, on average, 8.4 workers, with a similar composition of permanent and temporary workers, while informal brigades (the smaller entity by number of employees) employ, on average, 3.7 permanent workers and 3.2 temporary workers (table 5).

Table 5. Employee profile by characteristics of the construction entity

		Employees: no. (average)	Permanent workers: no. (average)	Temporary workers: no. (average)
Contractual arrange- ment	General contractors	24.7	14.7	10.1
	Special contractors	13.0	3.0	10.0
	Subcontractors	8.4	4.1	4.2
	Of which, informal brigades	6.9	3.7	3.2

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

3.2 Quantitative component

3.2.1. Structured interviews with employees

The main objective of the interviews with workers was to assess their working conditions and determine the presence of forced labour.

A total of 220 construction workers participated in the survey. Out of those, 219 were Mongolian and 1 Chinese. Among the 219 Mongolian respondents, 187 identified as Khalkha, with the remaining individuals representing various other ethnic groups, reflecting the diverse ethnic composition of Mongolia (table 6). Internal migrants represent 43.6 per cent of the sampled workers.

The sex distribution included 37 female workers and 183 male workers, with the participants' ages ranging from 16 to 65 years. The average age of the workers was 37 years old, highlighting a workforce spanning multiple generations.

Most of the workers interviewed were highly educated, with almost one third (29.6 per cent) having a bachelor's degree and 64.5 per cent having completed secondary education; only 5 per cent have undertaken technical and vocational education.

Table 6. Characteristics of the sampled workers

		No.	%
Sex	Female	37	16.8
	Male	183	83.2
Age	15–17 years	6	2.7
	18–24 years	27	12.3
	25–34 years	66	30.0
	35–44 years	66	30.0
	45–54 years	35	15.9
	55+ years	20	9.1
Ethnicity	Khalkha	187	85.4
	Other	33	14.6
Education	Bachelor's degree or higher	65	29.6
	Technical and vocational	11	5.0
	Secondary	142	64.5
	Primary or below	2	0.9
Migration status	International migrant	1	0.5
	Internal migrant	96	43.6
	Non-migrant	123	55.9
Total		220	100.0

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

3.2.2. Structured interviews with employers

The main objective of the interviews with the employers was to determine the nature and scale of their operations, tax and social insurance compliance, hiring practices and potential conditions that could lead to forced labour.

Among the respondents, nearly 44 per cent were company directors or engineers (43.9 per cent), 19.5 per cent were team leaders or brigade supervisors and around 10 per cent were managers (9.8 per cent). In one case, an accountant responded on behalf of a company (table 7).

Nearly 60 per cent of surveyed employers reported engaging in structural and framing work (58.5 per cent), while 56.1 per cent were involved in interior finishing and decoration. Some 32–40 per cent handled foundation and site work, electrical, plumbing and mechanical tasks, indicating that subcontracting is common practice for these tasks.

Table 7. Characteristics of the sampled employers

		No.	%
Position	Brigade supervisor	8	19.5
	Engineer	18	43.9
	Manager	4	9.8
	Accountant	1	0.02
	CEO	18	43.9
Construction work type	Foundation	13	31.7
	Building framework	24	58.5
	Exterior construction work	17	41.5
	Electricity, plumbing, mechanics	16	39.0
	Interior	23	56.1
Whether the employer pays tax	Yes	29	70.7
	No	12	29.3
Whether the employer pays social security contributions	Yes	28	68.3
	No	13	31.7
Whether subcontractors are hired	Yes	22	52.7
	No	19	46.3
Number of subcontractors	Mean	3.3	
Min		1	
	Max	8	
Female permanent workers	Average	2.7	
	Percentage of permanent employees		19.9
Permanent workers under 25	Average	1.4	
	Percentage of permanent employees		19.5
Permanent workers under 18	Average	0	
	Percentage of permanent employees		0
Total		41	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

3.3 Qualitative component

3.3.1. Semi-structured interviews with selected employees and employers

A total of 36 construction workers and 9 employers (7 formal businesses and 2 informal brigades) were selected for in-depth interviews. The selection included participants from multiple regions to ensure a diverse representation of experiences and perspectives. From Orkhon and Umnugobi provinces, five workers and two employers were interviewed in each province, while the remaining participants were based in Ulaanbaatar (table 8).

Table 8. Semi-structured interviews: Characteristics of the employers and workers

		Employers: no.	Workers: no.
Sex	Male	5	30
	Female	4	6
Age	15–17 years	n/a	0
	18–24 years	n/a	5
	25–34 years	n/a	9
	35–44 years	n/a	12
	45–54 years	n/a	5
	55+ years	n/a	5
Ethnicity	Khalkh	n/a	30
	Other	n/a	6
Education	Bachelor's degree or higher	n/a	14
	Technical and vocational	n/a	4
	High school	n/a	14
	Secondary	n/a	4
	Primary or below	n/a	0
Migration status	Internal migrant	n/a	12
	Non migrant	n/a	24
Type of business	Company/LLC	7	22
	Informal brigade	2	14
Location	Orkhon	2	5
	Umnugobi	2	5
	Ulaanbaatar	7	26
Total		9	36

Note: n/a = data not available.

Source: Data from research on working conditions in Mongolia's construction sector, 2024

Workers for in-depth interviews were carefully selected based on insights gathered during the structured survey interviews. Priority was given to workers who reported potential indicators of forced labour, ensuring that the interviews could explore these concerns in greater depth. Out of the 36 workers interviewed, 21 were employed by formal businesses and 15 by informal brigades.

To maintain a conducive and confidential environment, the in-depth interviews were scheduled separately from the initial site visits. These interviews were conducted either face to face at a neutral location or online, according to the participants' preference and convenience. This flexible approach ensured that workers felt as comfortable as possible sharing their experiences.

Qualitative data from the in-depth interviews were managed and analysed using NVivo, a specialized software for qualitative research. The software was used to code interview protocols systematically, allowing for detailed and nuanced analysis of the qualitative data.

► 4. Data collection process

4.1 The research team

The fieldwork for the research was conducted by a team of five dedicated researchers (one male and four female researchers). Most team members had prior experience in conducting similar research, which contributed to the smooth execution of the fieldwork. Additionally, one of the researchers had professional connections within the construction sector and was able to provide valuable insights and facilitate access to industry stakeholders.

The project's methodology and data analysis framework were meticulously designed and overseen by the senior researcher from the National Research and Consulting Center (NRCC). This ensured a rigorous approach to data collection and interpretation. The methodology underwent a thorough review process and received formal approval from experts at the ILO, further validating its robustness and alignment with international research standards.

4.2 Training and oversight

Research team members were trained on the concepts of forced labour by ILO experts at the project's outset. Subsequently, the NRCC organized an intensive two-day training session on data collection for all members of the research team. This training was held before (30 September 2024) and after (4 October 2024) the pilot study.

The training was structured to address key aspects of the research process and equip the team with the necessary skills and knowledge for high-quality data collection. The objectives of the training included the following elements:

1. Technical proficiency in KoboToolbox: Team members received hands-on training in using KoboToolbox, the digital platform for survey implementation. This included troubleshooting common technical issues to ensure a seamless data collection process.
2. Familiarization with the survey instrument: Researchers were introduced to the updated and improved survey tool, ensuring that they fully understood its structure, content and purpose.
3. Guidance on survey administration: The training provided detailed instructions on administering the survey, with a special focus on addressing challenges and obstacles identified during the pilot phase.
4. Emphasis on data accuracy: Researchers were trained on the critical importance of precision in data collection, including the correct application of skip logic, consistent coding of responses and careful handling of sensitive information to maintain data integrity.
5. Alignment on ethical standards: The session highlighted the ethical dimensions of the research, emphasizing the confidentiality of participant information, the safeguarding of sensitive data and respect for participants' rights throughout the study.

The NRCC senior researcher played a pivotal role in coordinating and supervising the training, ensuring that all team members were well-prepared, aligned with the research objectives and confident in their ability to execute their roles effectively.

The comprehensive training sessions laid a strong foundation for the research team, equipping them to carry out the full-scale study with professionalism, accuracy and ethical rigour.

4.3 Quantitative data collection

Quantitative data for the study were collected using a questionnaire designed jointly by the ILO and NRCC, which was administered through face-to-face interviews and phone calls with construction workers. The survey instrument was designed to gather comprehensive information required to assess the presence of forced labour indicators, in line with the ILO's analytic framework for defining forced labour.¹⁶

The survey development process included multiple stages of refinement. Initial drafts were rigorously vetted and revised in collaboration with ILO experts and research team members to ensure alignment with international standards and project objectives. After finalizing the first draft of the questionnaire, the research team prepared an online form using the KoboToolbox platform, utilizing computer-assisted technology to minimize data entry errors. The instrument was subsequently pilot-tested by several researchers to evaluate its clarity, reliability and applicability in the field.

The pilot study was conducted over three days, from 1 October to 3 October 2024, using the KoboToolbox platform, a reliable and efficient data collection tool. The research team administered the survey to 20 participants, supported by 5 NRCC research members. Half of the participants were construction workers, and the other half were individuals comprising a control group, whom we asked to answer hypothetically to check skips, relevances and inconsistencies.

Feedback from the pilot study resulted in certain changes to the survey, such as adding or removing some questions. These amendments were incorporated into further revisions of the survey and the final version was approved for use. The survey primarily comprised closed-ended questions, employing option lists and scalar formats that facilitated statistical analysis of the data collected. A limited number of open-ended qualitative questions were also included to complement the quantitative data. These questions allowed researchers to capture nuanced, contextual insights that could inform the interpretation of findings.

4.4 Qualitative data collection

In addition to the standardized survey, the research team conducted follow-up, in-depth, semi-structured interviews with a small subset of workers. These interviews provided an opportunity to delve deeper into specific aspects of the workers' recruitment and labour

¹⁶ ILO, [Guidelines Concerning the Measurement of Forced Labour](#), 20th International Conference of Labour Statisticians, 2018; ILO, [Hard to See, Harder to Count: Handbook on Forced Labour Surveys](#), 2024.

experiences, as well as to explore thematic issues of particular relevance to the study. This approach allowed for a richer understanding of the nuances and complexities underlying the survey data.

Beyond the interviews, additional qualitative data were collected through various complementary methods. The research team compiled detailed field notes and documented observations during the data collection process, capturing contextual insights, non-verbal cues and environmental factors that might not have been fully reflected in the survey responses. These observations added depth to the analysis and helped to put the findings into clearer context.

The team also engaged in open-ended consultations with key informants and stakeholders, including representatives from labour organizations, industry experts and community leaders. These interactions provided valuable perspectives and contextual knowledge, offering a broader understanding of the structural and systemic factors influencing workers' experiences in the construction sector.

4.5 Data accuracy

The research team implemented a systematic process of regular data review and cleaning, beginning at the earliest stages of data collection and continuing throughout the analysis phase.

During data collection, the team utilized the digital platform KoboToolbox, which permitted real-time monitoring of incoming data. This enabled supervisors to identify inconsistencies, incomplete responses or errors promptly. Researchers were provided with immediate feedback, allowing them to address issues while on site, thereby minimizing the risk of flawed or missing data.

At the end of each data collection day, team members conducted a structured review of the newly collected data. This review focused on checking for:

- completeness – ensuring that all required fields were filled out;
- logic and consistency – verifying that responses followed the expected patterns, particularly where skip logic was applied;
- coding errors – identifying and correcting any mistakes in pre-coded or categorized responses.

Following data collection, the dataset underwent a comprehensive cleaning process to further enhance accuracy. This process involved:

- removal of duplicates – identifying and eliminating any duplicate entries;
- validation of outliers – reviewing extreme or unusual values to determine whether they were valid responses or errors;
- standardization – ensuring uniformity in coding and formatting across the dataset to achieve consistency.

To further validate the quantitative data, the team cross-referenced survey responses with qualitative data, including field notes and interview records. This step helped to identify any discrepancies and provided additional context for ambiguous responses.

The data-cleaning process was carried out collaboratively by multiple team members, with the senior researcher providing oversight. This collaborative approach reduced the likelihood of errors being overlooked and ensured alignment with the project's methodology.

By incorporating regular review and cleaning processes, the research team was able to ensure that the data collected was accurate, reliable and ready for rigorous analysis. These measures not only enhanced the integrity of the findings but also reinforced the credibility of the research outcomes.

4.6 Ethical considerations

Ethical considerations were central to the design and implementation of this research, ensuring the protection of participants' rights and the integrity of the study. The research adhered to international ethical standards, with a particular focus on maintaining confidentiality.

1. **Informed consent:** Participants were fully informed about the purpose of the research, the nature of their involvement and their rights as participants before taking part in the study. This information was provided in clear and accessible language, and participation was entirely voluntary. Participants were given the option to withdraw from the study at any point without any consequences.
2. **Confidentiality and anonymity:** Protecting the privacy of participants was paramount. All data were anonymized to ensure that individual respondents could not be identified. Identifying information was either excluded or securely stored in accordance with data protection protocols. Access to sensitive data was restricted to authorized members of the research team.
3. **Handling sensitive topics:** Given the nature of the study, some survey questions and interviews covered sensitive topics, such as indicators of forced labour or exploitative practices. Researchers were trained to approach these topics with sensitivity and professionalism, ensuring that participants felt safe and respected at all times.
4. **Minimizing harm:** The research team took steps to ensure that participation in the study did not expose respondents to harm, whether psychological, social or economic. This included designing survey questions to minimize distress and ensuring that participants were not placed at risk of retaliation or discrimination for sharing their experiences. Additionally, all participants, both employers and workers, were given a pen and a notebook containing information on forced labour.

By integrating these ethical principles into every stage of the research process, the study aimed to uphold the dignity and rights of all participants while producing reliable and meaningful results.

4.7 Challenges in data collection

Difficulties faced during the data collection process are detailed below:

- Construction companies and workers frequently refused to participate in the survey, so different approaches were adopted. Our researchers visited construction sites and conducted interviews with those employees and companies that agreed to take part in the study. The research team also approached labour exchange offices to identify construction workers who had made complaints and used the snowball method to attempt to contact other workers potentially in forced labour.
- The snowball sampling method was ineffective as most survey participants did not know individuals from other construction sites who might have experienced forced labour. Those who were referred either declined to participate or did not respond to phone calls. Therefore, our researchers visited construction sites to introduce the survey, inquire about the possibility of participation and conduct the survey with those workers and employers who agreed to take part.
- A lot of rescheduling occurred when trying to do in-depth interviews with employers.
- When conducting phone surveys, calls had to be made relatively late at night after the workers finished their shifts, sometimes as late as 11 p.m.
- At times, the research team was asked to leave the construction site by the supervisor, as their presence was seen as delaying the workers' tasks, resulting in limited survey collection.
- Some participants became upset when asked questions about forced labour and whether they had sought help from anyone.
- Conducting interviews with migrant workers turned out to be challenging as their supervisor or they themselves refused to participate in the interview and survey. We visited four construction sites that had Chinese workers with our translator requesting them to take part in the survey. Only one worker agreed to take part in the survey; the other workers refused to participate after hearing our explanation of the purpose of the research survey.

► 5. Working conditions in the construction sector

5.1 Characteristics of jobs in the construction sector and tasks

Although 40.4 per cent of the workers interviewed have a permanent contract, the majority – comprising seasonal (33.2 per cent) and temporary workers (26.3 per cent) – are employed under non-permanent arrangements, highlighting a general lack of stable employment among those interviewed. Women are more likely than men to engage in permanent work, most likely due to their specialization in interior finishing, which can be carried out year-round, regardless of the season.

Results seem to indicate that adult workers (25–54 years old) are more likely to have a permanent job, whereas young workers (18–24 years old) are more likely to have a temporary (44.4 per cent) or seasonal job (37 per cent). No significant differences exist between migrant and non-migrant workers in terms of securing a permanent job (table 9).

Workers with a bachelor's degree are three times more likely to have permanent jobs than temporary ones and almost fivetimes more likely to have permanent jobs than seasonal jobs. Workers with secondary education are more likely to have a seasonal job (41.5 per cent); however, differences in terms of securing a permanent, temporary or seasonal job are less striking than among workers with a bachelor's degree.

During the in-depth interviews, some reasons emerged that can explain these results. First, a significant proportion of permanent workers are engineers, due to the requirement for construction companies to employ full-time engineers in order to obtain a special licence. Second, formal education is not sufficient to acquire the necessary skills, and many workers master them through hands-on learning, mentorship from experienced colleagues and on-the-job training. These forms of learning allow them to transition to higher-paying roles: some workers started as apprentices or assistants and gradually transitioned to specialized roles.

Employers confirm this view and indicate that new graduates from vocational training education centres lack the necessary skills and experience.

Table 9. Employment type by demographic characteristics

		Permanent		Temporary		Seasonal		Total	
		No.	%	No.	%	No.	%	No.	%
Sex	Male	66	36.1	52	28.4	65	35.5	183	100
	Female	23	62.2	6	16.2	8	21.6	37	100
Age	15–17 years	3	50.0	1	16.7	2	33.3	6	100
	18–24 years	5	18.5	12	44.4	10	37.0	27	100
	25–34 years	32	48.5	14	21.2	20	30.3	66	100
	35–44 years	28	42.4	17	25.8	21	31.8	66	100
	45–54 years	15	42.9	6	17.1	14	40.0	35	100
	55+ years	6	30.0	8	40.0	6	30.0	20	100
Ethnicity	Khalkha	77	41.2	52	27.8	58	31.0	187	100
	Other	12	36.4	6	18.2	15	45.4	33	100
Education	Bachelor's degree or higher	42	64.6	14	21.5	9	13.8	65	100
	Technical and vocational	3	27.3	4	36.4	4	36.4	11	100
	Secondary	44	31.0	39	27.5	59	41.5	142	100
	Primary or below	0	0.0	1	50.0	1	50.0	2	100
Migration status	International migrant	1	100.0	0	0.0	0	0.0	1	100
	Internal migrant	39	40.6	28	29.2	29	30.2	96	100
	Non-migrant	49	39.8	30	24.4	44	35.8	123	100
	Total	89	40.4	58	26.4	73	33.2	220	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

WORKERS...

"I am specializing in masonry work. I used to help my father on construction site by mixing cement when I was 13 and learned masonry. I am currently working on infilling walls, laying blocks, and bricks."

"My first degree is nursing, and my husband's first degree is medical science. We have been working for construction sector for 10 years since we learned interior decorating by doing."

"My first degree is x-ray technician. Now I am doing construction of building framework. I learned by watching other workers and by trying myself without formal training."

EMPLOYERS...

"We have tried to hire apprentices. Young people are unskilled and incompetent. As they cannot do jobs properly, we usually appoint cleaning tasks for them. Students of VET centres cannot even prepare simple mixtures, such as putty. On the other hand, young workers have not been given opportunity to improve their skills as big companies usually let them do general assisting tasks. It is rare that young people have interest to improve their skills and excel in their vocation."

In terms of employment arrangements, 65 workers (29.5 per cent) reported being employed in informal brigades, while 155 (70.5 per cent) were employed by registered construction companies. Workers from Orkhon and Umnugobi provinces are more likely to have permanent contracts compared to those in Ulaanbaatar, as shown in table 10. In the case of Umnugobi, this is explained by the fact that all surveyed workers were employed by officially registered companies (table 10).

Employees of general contractor companies are more likely to have permanent contracts compared to those working for subcontractors. This is not surprising as general contractors are all officially registered. Similarly, workers in informal brigades have mostly temporary or seasonal job arrangements (table 10).

Table 10. Employment type by employer's characteristics

		Permanent		Temporary		Seasonal		Total	
		No.	%	No.	%	No.	%	No.	%
Entity location	Orkhon	15	44.1	9	26.5	10	29.4	34	100
	Umnugobi	19	52.8	5	13.9	12	33.3	36	100
	Ulaanbaatar	55	36.7	44	29.3	51	34.0	150	100
Type of entity	General contractor	36	38.7	26	28.0	31	33.3	93	100
	Subcontractor	13	30.2	17	39.5	13	30.2	43	100
Type of business	Company/LLC	71	45.8	34	21.9	50	32.3	155	100
	Informal brigades	18	27.7	24	36.9	23	35.4	65	100

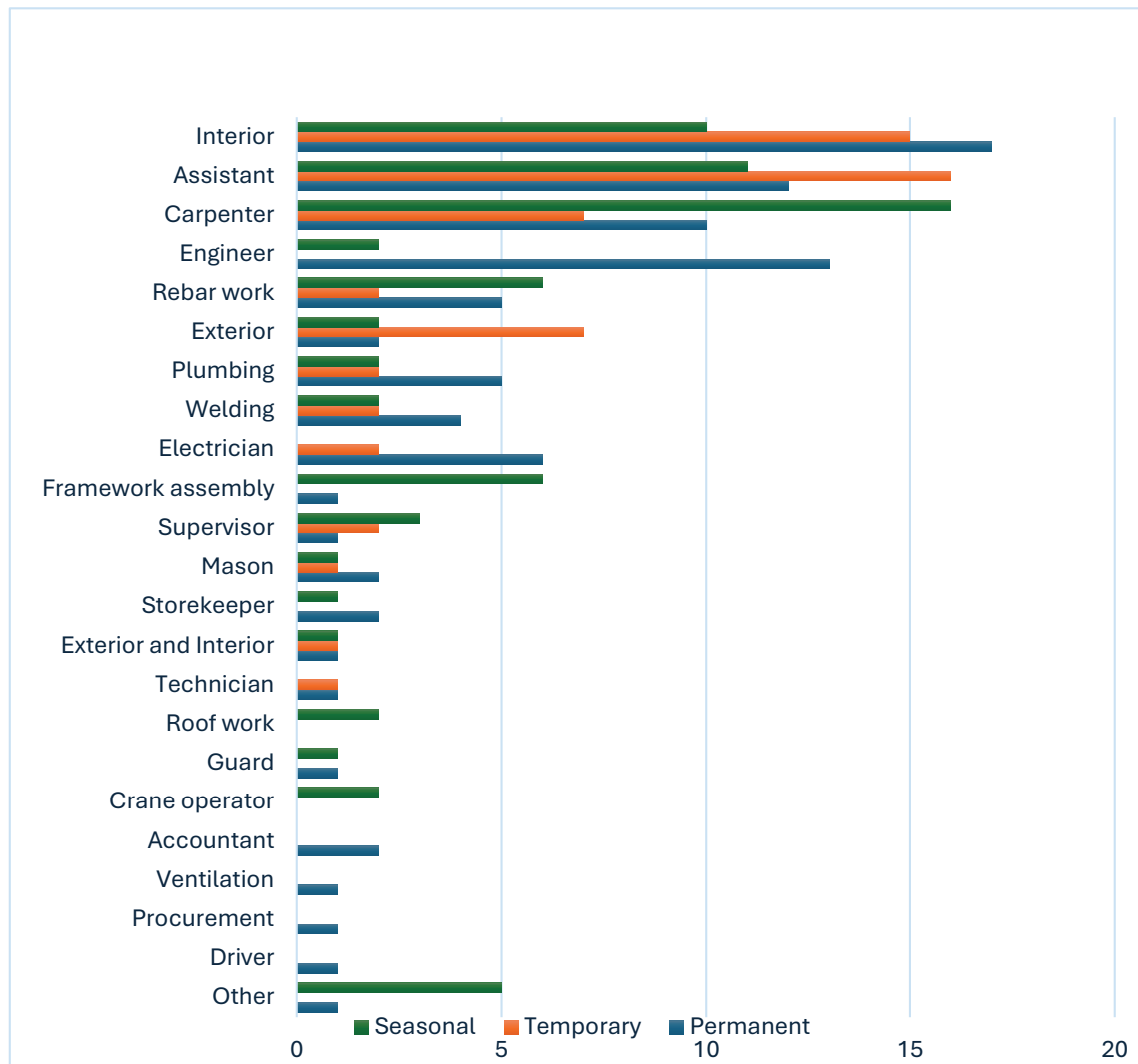
Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The surveyed workers were engaged in diverse construction activities, such as public building projects (e.g. libraries, service buildings and schools), residential housing, private house construction, exterior and interior decoration, and window installation.

They were involved in a variety of activities, such as interior and exterior tasks, providing construction assistance, carpentry, rebar installation and many others (figure 5). Interior finishing work is the most common task, followed by acting as an assistant and carpentry tasks.

Workers involved in interior finishing are more likely to have permanent contracts, whereas those working as construction assistants are more often on temporary contracts. Meanwhile, carpenters are more likely to work under seasonal contracts.

Figure 5. Main tasks (count), by type of contract



Source: Data from research on working conditions in Mongolia's construction sector, 2024.

In-depth interviews with workers revealed that most of them have specific roles, such as structural engineers, electricians, plumbers, masons, interior decorators, plasterers and carpenters.

General workers are often involved in materials handling, mixing cement and assisting skilled workers. Skilled workers are usually appointed in accordance with their skills for certain projects, while unskilled workers usually do various assisting tasks, which often makes them dissatisfied with their role.

Skills in multiple areas are valued, with many workers capable of performing tasks across various domains, allowing them to shift easily between tasks and roles and to adapt to project demands. However, the ability to undertake multiple tasks creates a disadvantage for workers who are asked to perform tasks that were not originally agreed upon when facing time constraints and labour shortages.

WORKERS...

"I am currently working on carpentry. In winter, I usually do interior decorating and plastering."

"I have been doing all kinds of work, such as assistant, plasterer and mason, since I started working for construction as a driver. I have no formal vocational training. Driving was a vocation when I was young. I learned skills required for construction works simply by practice."

"I work as an assistant. I prepare all necessary mixtures, such as cements, black and white putty, and glue. Also, I carry equipment and tools upstairs and downstairs many times a day manually."

5.1.1. Contracting

Labour relations in the construction sector seem to be characterized by a lack of contractual agreement. Out of the 220 workers interviewed, only 89 reported having a written agreement (40.5 per cent) specifying tasks, working hours and payment terms. More than half of the workers interviewed have oral agreements and 16 (7.3 per cent) have no agreement at all. Female workers are more likely to have a written contract than their male counterparts: this might relate to their specialization in interior finishing, which allows them to secure more permanent positions (as discussed in section 5.1). Oral agreements are particularly common among younger workers aged 18–24 (66.7 per cent). No significant differences exist by migration status or ethnicity (table 11).

Table 11. Contractual status by employee characteristics

		Written agreement		Oral agreement		No agreement	
		No.	%	No.	%	No	%
Sex	Male	67	36.6	101	55.2	15	8.2
	Female	22	59.5	14	37.8	1	2.7
Age	15–17 years	3	50.0	3	50.0	0	0.0
	18–24 years	6	22.2	18	66.7	3	11.1
	25–34 years	31	47.0	27	40.9	8	12.1
	35–44 years	26	39.4	38	57.6	2	3.0
	45–54 years	15	42.9	20	57.1	0	0.0
	55 + years	8	40.0	9	45.0	3	15.0
Ethnicity	Khalkha	74	39.6	99	52.9	14	7.5
	Other	15	45.5	16	48.5	2	6.0
Education	Bachelor's degree or higher	39	60.0	22	33.8	4	6.2
	Technical and vocational	3	27.3	6	54.5	2	18.2
	Secondary	47	33.1	87	61.3	8	5.6
	Primary or below	0	0.0	0	0.0	2	100.0
Migration status	International migrant	0	0.0	1	100.0	0	0.0
	Internal migrant	41	42.7	48	50.0	7	7.3
	Non-migrant	48	39.0	66	53.7	9	7.3
Total		89	40.5	115	52.3	16	7.3

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

There is a stark disparity in labour contracts between permanent and temporary workers. The majority of permanent workers (59.6 per cent) have written agreements, while temporary and seasonal workers are more likely to have oral agreements (63.8 per cent and 61.6 per cent, respectively) (table 12).

Table 12. Contractual status by employers' and work characteristics

		Written agreement		Oral agreement		No agreement	
		No.	%	No.	%	No.	%
Entity location	Orkhon	19	55.9	13	38.2	2	5.9
	Umnugobi	26	72.2	9	25.0	1	2.8
	Ulaanbaatar	44	29.3	93	62.0	13	8.7
Type of entity	General contractor	42	45.2	41	44.1	10	10.8
	Contractor with special permit	n/a	n/a	n/a	n/a	n/a	n/a
	Subcontractor	10	23.3	30	69.8	3	7.0
Type of employment	Permanent	53	59.6	33	37.1	3	3.4
	Temporary	13	22.4	37	63.8	8	13.8
	Seasonal	23	31.5	45	61.6	5	6.8
Total		89	40.5	115	52.3	16	7.3

Note: n/a = not available.

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

These results are confirmed by employers, who report that they prefer to issue written contracts to their permanent workers rather than to temporary workers. According to the employers' survey, 28 companies/LLCs signed labour contracts with their permanent workers, while only 1 informal brigade did so (table 13).

Table 13. Contractual status according to employers' survey

		No.
Sign contract with permanent workers	All employers	29
	Company/LLC	28
	Informal brigades	1
Sign contract with temporary workers	All employers	4
	Company/LLC	4
	Informal brigades	0

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

Four of the in-depth interviewees shared their experiences of completing work based on verbal agreements. Among them, two reported being negatively affected by such agreements while the other two had not experienced any problems. One of the two alleged victims was in forced labour and, due to the absence of a formal contract, did not report the case through official channels, ultimately abandoning the case. The other individual started work under a formal contract but later took on additional tasks under a verbal agreement and was not compensated for the extra work.

WORKERS...

“There was a time when I quit a job after not being paid for a week. Since it was an oral agreement, I assumed I would fail in pursuing the issue officially and decided to let it go.”

“Currently, I work under oral agreements. I’ve never backed out of an oral agreement. However, employers might withhold or partially pay wages if they find the worker unskilled.”

“In my case, I brought my children and relatives from the countryside, formed a brigade, and completed a project for a company. However, I could not receive a payment worth 30 million Mongolian tugriks (MNT). The work involved finishing decoration tasks from the 5th to the 9th floors. We signed a written contract for the job and completed the work before the scheduled time. The client then requested us to finish the 10th floor as additional work, which we agreed to do verbally. I filed a legal claim when they refused to pay for the additional work. However, the client only presented the written contract in court and dismissed the case.”

One issue highlighted by the in-depth interviewees regarding contracts that requires further attention was the practice of entering into subcontracting agreements with small brigades. These small brigades, which often operate informally due to the tax burdens on formal entities, do not register as entities and enter service contracts when working as subcontractors. While such contracts specify job descriptions and payments, they may exclude clauses related to occupational health and safety and other responsibilities that are standard in agreements with licensed enterprises. This practice can lead to widespread violations of occupational health and safety and conditions resembling forced labour when multiple subcontractors are involved.

In the construction sector, it is common to enter into subcontracting agreements with enterprises and small teams that specialize in specific types of activities. However, this practice creates a multi-tiered contractual network that can increase the risk of contract breaches. Both employers and workers have raised concerns about the prevalence of such issues. Additionally, resolving contractual disputes through legal and judicial institutions often requires significant time and effort, making contracts less effective as protective mechanisms.

WORKERS...

“If a subcontractor’s permanent employee suffers any injury, the subcontracting company can face severe penalties, including licence revocation. Because of strict occupational health and safety requirements, subcontracting companies usually don’t hire many permanent employees. Therefore, they prefer to employ independent workers like us, who join as auxiliary teams under the subcontractors. In cases of injury, the subcontractor simply points out that occupational health and safety training and signatures were provided, leaving the matter at that. As auxiliary teams, we typically work under oral agreements because we don’t negotiate directly with the general contractors. Subcontractors often employ teams like ours to avoid responsibilities and occupational health and safety compliance.”

“One critical issue in the construction sector is the need to clarify the hierarchy and relationships between the client, general contractor, subcontractor and brigades. While there might be regulations in place, they often fail to apply in practice. Clients and contractors generally sign official agreements as registered VAT-paying entities. However, independent brigades, reliable and made up of family members, face challenges because non-registered entities aren't allowed to participate. Tax obligations often become a burden when forming registered entities. During inspections of businesses, written agreements are required. As a result, brigades are hired under personal service contracts based on individual rates.”

It is important to recall that workers without a written employment contract do not have access to social protection, including social and health insurance, as well as pension entitlements, unless they voluntarily contribute to it.

As shown in table 14, employers of workers without written contracts contribute significantly less to social insurance, paid leave and holiday allowances compared to those whose workers have written contracts. Notably, even among workers with written contracts, there is a considerable number of instances where employers fail to provide these benefits.

Table 14. Contractual status by employers' paid benefits

		Written agree- ment		Oral agree- ment		No agree- ment	
		No.	%	No.	%	No.	%
If employer pays social security contributions	Yes	48	82.8	8	13.8	2	3.4
	No	41	25.3	107	66.0	14	8.6
If employer pays for workers' annual leave	Yes	23	88.5	3	11.5	0	0.0
	No	66	34.0	112	57.7	16	8.3
If employer provides paid leave	Yes	27	90.0	3	10.0	0	0.0
	No	62	32.6	112	58.9	16	8.5
Total		89	40.5	115	52.3	16	7.2

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

5.1.2. Working time

Mongolia adheres to international standards, with standard working hours per day set at 8 hours (40 hours per week). The new Labour Law, which came into effect in 2022, introduces further provisions on working hours and provides enhanced protection for workers. Under the previous regulations, the maximum working hour limit applied solely to minors. The new Labour Law limits adults' working time to a maximum of 56 working hours per week and 4 hours of overtime per day.¹⁷ Although the introduction of a maximum number of working hours per week is an improvement, it is still above the ILO standard of 48 hours per week.¹⁸ Moreover, workers in the construction sector are consistently exceeding these legal limits.

¹⁷ Government of Mongolia, [Labour Law](#), 2021.

¹⁸ ILO, [Hours of Work \(Industry\) Convention, 1919 \(No. 1\)](#).

According to the employee survey, the average daily working hours for these workers is 9.6, with a staggering 6.3 days worked per week (table 15). Half of the employees work 10 or more hours a day, 7 days a week, resulting in an average weekly workload of 60.9 hours – far exceeding the legal limit of 56 hours.

While there are slight variations in working hours between Ulaanbaatar, Orkhon and Umnugobi, the overall picture remains consistent. Similarly, it is concerning to see that these excessive working hours are prevalent across both formal and informal businesses.

There is no significant difference in working hours across various worker characteristics, such as ethnicity, migration status and gender. However, lower levels of education are associated with longer working hours.

Table 15. Daily working hours and weekly working days

		Daily working hours			Weekly working days	
		No.	Mean	Median	Mean	Median
Sex	Female	37	9.5	10	5.9	6
	Male	183	9.7	10	6.4	7
Age	15–17 years	6	9	10	5.5	5.5
	18–24 years	27	9.9	10	6.1	6
	25–34 years	66	9.5	10	6.3	6.5
	35–44 years	66	9.5	9	6.4	7
	45–54 years	35	9.9	10	6.3	7
	55+ years	20	9.9	10	6.4	7
Ethnicity	Khalkha	187	9.5	10	6.3	6
	Other	33	10.0	10	6.4	7
Education	Bachelor's degree or higher	65	9.1	9	6.1	6
	Technical and vocational	11	9.4	9	5.9	6
	Secondary	142	9.9	10	6.4	7
	Primary or below	2	14	14	7	7
Migration status	International migrant	1	10	10	7	7
	Internal migrant	96	9.6	10	6.4	7
	Non-migrant	123	9.7	10	6.2	6
Location	Orkhon	34	9.6	8.5	6.0	6
	Ulaanbaatar	150	9.7	10	6.3	7
	Umnugobi	36	9.4	10	6.4	7
Employer type	Formal business	155	9.6	10	6.3	6
	Informal business	65	9.6	10	6.4	7
Work type	Permanent	89	9.2	9	6.0	6
	Temporary	58	9.7	10	6.4	7
	Seasonal	73	10.1	10	6.5	7
Total		220	9.6	10	6.3	7

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The average weekly working hours differ significantly between permanent, temporary and seasonal workers. Permanent employees work an average of 54 hours weekly, while temporary and seasonal employees work an average of 63 hours weekly.

Among the interviewed workers, eight people identified long working hours and overtime as a disadvantage of working in the construction sector. However, some workers view flexible working hours, which are often found in brigade arrangements, as an advantage.

There are workers who have welcomed the new regulation. Two interviewees specifically mentioned that this recent limitation on overtime has positively impacted their working conditions.

WORKERS...

“Joining a brigade in the construction sector can be advantageous. For instance, workers in brigades are not strictly bound by fixed hours and can request their wages directly from the brigade leader whenever needed. Moreover, wages have increased, and skilled workers often prefer to join brigades and work independently.”

“Compared to other industries, working conditions in construction are significantly worse. For me, it was very challenging due to extremely long working hours, often seven days a week.”

“Working conditions are acceptable, but there were instances where I was required to work longer hours than initially agreed upon. While we agreed on an 8–9-hour work day, I often worked 10 hours a day.”

“The construction sector has the disadvantage of working long hours in cold and damp environments.”

“Previously, we worked excessively long hours, including evenings and weekends, often up to 12 hours daily. However, since January 2024, the revised Labour Law has limited weekly working hours, including overtime, to 56 hours, leading to significant improvements.”

“Before the new regulation in the law, we worked every day, including weekends, with no defined end to our shifts. The overtime requirements were overwhelming. The new Labour Law, which limits work to 56 hours per week, is a positive development. Currently, while standard work-weeks are 40 hours, additional hours may be added as needed, up to the 56-hour limit. Some people still work on Saturdays. But the elimination of excessive weekend work has left some workers in shock due to the sudden change. Now, wages and working hours have become more reasonable.”

5.1.3. Earnings

Most employees (66.8 per cent) negotiate their wages, while for less than one third (30.5 per cent) the wage is set by employers. Employees in the construction sector earn, on average, 3.05 million tugriks per month, with a half of the workers earning more than 2.5 million tugriks. The mean wage of formal businesses is 13.5 per cent lower than that of informal businesses regardless of the tasks involved. Based on in-depth interviews, the steady salaries paid during off-seasons to permanent employees working in formal businesses could be one reason for

the low mean wage. During in-depth interviews, some employees mentioned that they receive salaries equivalent to the minimum level during these periods of inactivity.

Female workers earn, on average, 88.1 per cent of male workers' earnings each month, regardless of the type of work involved. In terms of age, workers aged 35–44 years old are the most highly paid, on average, while those aged 15–17 years are the lowest paid. Interestingly, those workers with secondary level education are the most highly paid, on average, earning 16.4 per cent more than workers with bachelor's degrees or higher qualifications (Table 16). In the sample, eight workers (one from Orkhon, three from Umugobi and four from Ulaanbaatar) do not get paid, or the monthly wage is zero. Excluding zero wages, the mean monthly wage is 3.05 million tugriks. Almost all employees (96.8 per cent) have their wages paid into their bank account, while five (2.3 per cent) are paid in cash.

Table 16. Monthly wage, by workers' and employment characteristics

		Monthly wage, 1 000 MNT		
		No.	Mean	Median
Sex	Female	37	2 741.9	2 300
	Male	183	3 113.4	2 700
Age	15–17 years	6	1 308.3	1 375
	18–24 years	27	2 874.1	2 700
	25–34 years	66	2 957.6	2 500
	35–44 years	66	3 337.1	3 000
	45–54 years	35	3 254.3	3 000
	55+ years	20	2 820	2 500
Ethnicity	Khalkha	187	2 992.5	2 500
	Other	33	3 253.4	3 000
Education	Bachelor's degree or higher	65	2 774.6	2 300
	Technical and vocational	11	2 490.9	2 400
	Secondary	142	3 229.2	3 000
	Primary or below	2	2 450.0	2 450
Migration status	International migrant	1	7 500.0	7 500
	Internal migrant	96	3 100.0	2 800
	Non-migrant	123	2 976.4	2 500
Location	Orkhon	34	2 889.7	2 200
	Ulaanbaatar	150	3 037.7	3 000
	Umnugobi	36	3 258.3	2 500
Employer type	Formal business	155	2 916.8	2 500
	Informal business	65	3 370.6	3 000
Work type	Permanent	89	2 917.4	2 500
	Temporary	58	2 959.5	2 775
	Seasonal	73	3 286.3	3 000
Total		220	3 051.0	2 500

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

During in-depth interviews, differences in perspectives on wages were observed between workers and employers. While some workers consider wages in the construction sector to be higher than those in other industries, others feel that the pay is low given the sector's

physically demanding, hazardous and harmful working conditions. Some also expressed dissatisfaction with low wages despite long working hours.

Both workers and employers noted ambiguities in ensuring fair wage evaluations. Determining wages based on skills, qualifications, performance and job quality appears to be challenging. For example, there is limited understanding of how to fairly assess work performed in hazardous or risky conditions. While some workers acknowledge that their wages are high, they argue that their pay should be further increased given the dangerous and harmful nature of their work.

Moreover, it was reported that when quality control is weak, opportunities arise for poorly executed work, leading to skilled workers being undervalued and, more generally, affecting the overall quality of the work.

WORKERS...

"The conditions in Mongolia's construction sector have improved compared to previous years. Large companies are now able to pay high wages to their workers. Compared to other industries, wages in construction are relatively high."

"Construction wages are among the highest, second only to mining."

"I've been working in construction for over ten years and know the job well. I'm doing it because the pay is good. I'm taking the risks because I need the money."

"Wages in construction are considered high because they are paid in lump sums without deductions. However, for workers exposed to risks such as falls, slips or accidents on construction sites, the pay is still low."

"There are significant discrepancies in hourly rates. For instance, our hourly wage is 15,000 MNT, while other teams earn 25,000 MNT. Although our wages are considered high based on Mongolia's wage standards, they fall short when factoring in the health hazards and conditions in construction, especially in mining-related projects."

"Carpentry wages vary significantly. The low quality of the training system in the construction sector results in low valuations for construction workers. Certifying carpenters and establishing pay scales based on their skill levels could help. Currently, anyone can claim to be a carpenter and charge high rates without verification."

EMPLOYERS...

"A proper system for evaluating job performance and wage assessments is needed. Currently, unskilled 'I can do it' workers are earning the same as skilled professionals. While these unskilled workers may complete tasks quickly, their work is often substandard."

Wages are often paid in full without any deductions. Eight employees (3.6 per cent) reported that deductions were made from their wages. The main reason (given by four workers) for deductions was to pay for damage to equipment and materials. The deductions were, on average, 33.5 per cent of their monthly wages. However, this figure varied significantly, from 10 per cent to 73.1 per cent.

Most of the workers (158 or 71.8 per cent) are paid their wages according to a fixed schedule. The bi-weekly payment schedule is the most common method (46.2 per cent), followed by daily (21.5 per cent) and monthly payments (19.6 per cent). On the other hand, 28.2 per cent (62) of employees are not paid according to a fixed schedule and, of these, most are paid based on their job performance (58 or 93.5 per cent).

In Ulaanbaatar, 78.0 per cent of employees are paid according to a fixed schedule, while in Umnugobi and Orkhon 66.7 per cent and 50 per cent, respectively, receive fixed schedule payments (table 17).

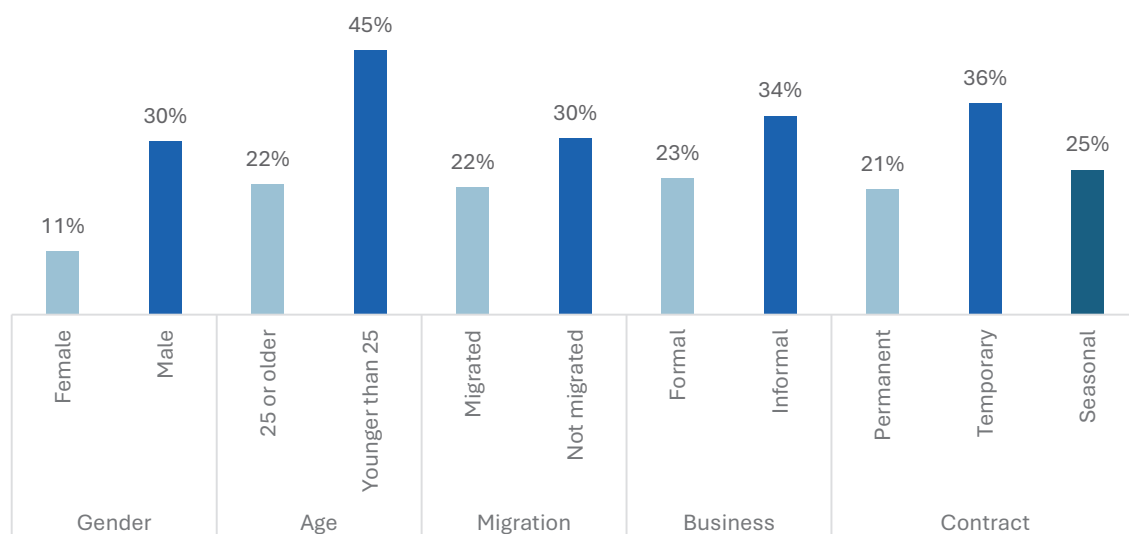
Table 17. Payment schedule, by workers' and employment characteristics

		Fixed schedule		Not fixed schedule	
		No.	%	No.	%
Sex	Female	31	83.8	6	16.2
	Male	127	69.4	56	30.6
Age	15–17 years	4	66.7	2	33.3
	18–24 years	21	77.8	6	22.2
	25–34 years	53	80.3	13	19.7
	35–44 years	46	69.7	20	30.3
	45–54 years	22	62.9	13	37.1
	55+ years	12	60.0	8	40.0
Ethnicity	Khalkha	131	70.1	56	29.9
	Other	27	81.3	6	18.7
Education	Bachelor's degree or higher	49	75.4	16	24.6
	Technical and vocational	90	73.2	33	26.8
	Secondary	19	63.3	11	36.7
	Primary or below	0	0.0	2	100
Migration status	International migrant	1	100.0	0	0
	Internal migrant	67	69.8	29	30.2
	Non-migrant	90	73.2	33	26.8
Location	Orkhon	17	50.0	17	50.0
	Ulaanbaatar	117	78.0	33	22.0
	Umnugobi	24	66.7	12	33.3
Employer type	Formal business	115	74.2	40	25.8
	Informal business	43	66.2	22	33.8
Work type	Permanent	76	85.4	13	14.6
	Temporary	33	56.9	25	43.1
	Seasonal	49	67.1	24	32.9
Total		158	71.8	62	28.2

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

It is crucial to note that both employers' and employees' surveys reveal a pervasive issue in the construction sector: delays in payment of wages. More than one quarter of surveyed employees (26.4 per cent) experience these delays, which affect both formal businesses (24.2 per cent) and informal businesses (31.0 per cent). According to the employer survey, 46.3 per cent (19) face circumstances that affect the timing of worker payment. The primary reason (72.2 per cent) for these delays is the delay in payment by the party ordering the work (general contractors or contractors). However, a stark contrast is observed between general contractors and subcontractors, with delays to workers' payments extremely common among subcontractors (70.6 per cent) in comparison to general contractors (29.2). Additionally, 14.6 per cent of employers (six) stated that they had employees who owed money to the company. The incidence of delayed payments is not uniform across different groups. It is alarming to note that among young workers (under 25 years old) the incidence of delayed payment is twice as high (45 per cent) as among their older counterparts (22 per cent). Moreover, 30 per cent of male workers had experienced delayed payment, compared to just 11 per cent of female workers. Workers in informal businesses have a higher incidence of delayed payment than those in formal businesses, while temporary and seasonal workers have a higher incidence than permanent workers (figure 6).

Figure 6. Delay in payment of wages, by workers' and employment characteristics



Source: Data from research on working conditions in Mongolia's construction sector, 2024.

According to the in-depth interviewees, delayed, partial or non-payment of wages is common. As a result, a trend of daily wage payments has emerged, which workers appreciate. However, employers expressed concerns about this practice contributing to human resource instability.

EMPLOYERS...

"Some workers take their wages and leave, which disrupts workflow. Others even disappear after having lunch. Therefore, employers prefer monthly wage payments to promote workforce stability."

5.2 Occupational safety and health

Occupational safety and health (OSH), particularly within the construction sector, remains a significant challenge for the country. This issue was evident during the fieldwork, where both workers and employers acknowledged that safety protocols were not being fully implemented or adhered to. Despite widespread awareness of the importance of these measures, there appears to be a gap between understanding and implementation that leaves workers vulnerable to preventable accidents and health risks. Addressing this problem requires a concerted effort to enforce safety regulations, improve compliance and promote a culture of accountability and prioritization of worker well-being in the construction industry.

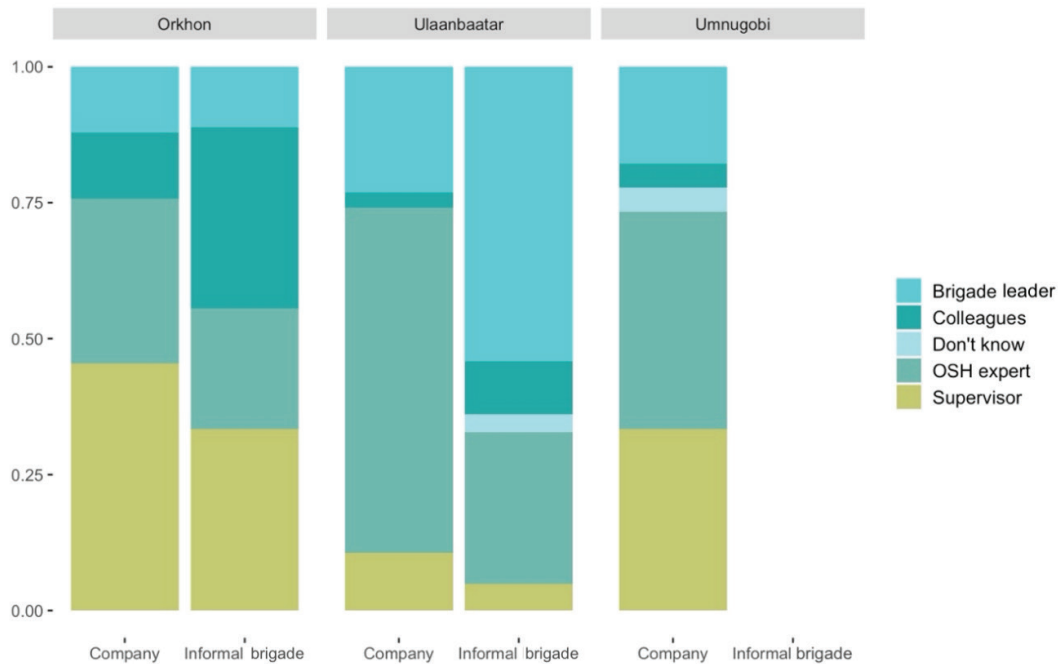
The lack of compliance with OSH protocols was identified as construction workers' most important concern during the in-depth interviews. Out of 36 workers who participated in the in-depth interviews, 23 people expressed concerns. They feel that the construction sector is characterized by high-risk and hazardous conditions for health and that OSH supervision, inspection and enforcement are very weak.

5.3 Employee survey

In total, 11 out of 220 workers had been exposed to occupational injuries (table A3 in the appendix to this report) and 20 reported having witnessed co-workers being injured in the workplace. Workers exposed to occupational injuries (11) were involved in a variety of tasks, such as interior finishing, exterior finishing and welding. Permanent workers reported seeing more workplace accidents than part-time workers in all three surveyed regions. This is probably because they stay on construction sites for a longer period, which increases their likelihood of witnessing accidents over time (table A3), while temporary workers usually work for shorter periods and so are less exposed to the site, meaning that they see fewer incidents.

The way in which workers report workplace accidents differs significantly based on their employer type. Workers who are employed by companies predominantly report accidents to their supervisors and OSH worker, reflecting the structured communication and safety protocols typically present in organizational settings. In contrast, workers employed under informal arrangements are more likely to report incidents to their brigade leaders. This suggests a more informal reporting structure, where the brigade leader often serves as the primary point of contact for addressing workplace issues, including accidents (figure 7).

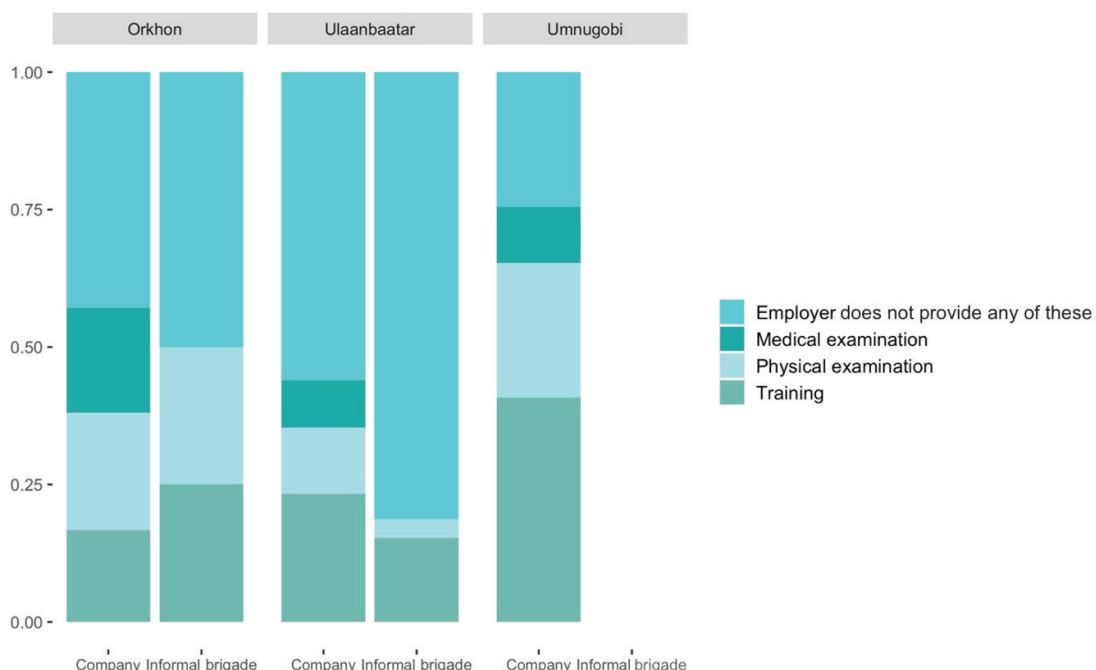
Figure 7. Who workers report to when something happens on site



Source: Data from research on working conditions in Mongolia's construction sector, 2024

Workers in Ulaanbaatar are more likely to report workplace incidents to OSH professionals (55.3 per cent) compared to their counterparts in the rural provinces of Orkhon and Umnugobi (35.3 per cent and 50 per cent, respectively). This trend is particularly evident among workers employed by companies, where urban settings often provide greater access to OSH professionals and established safety protocols. In contrast, workers in rural areas may rely on less formal reporting structures, potentially due to the limited availability of OSH experts or differing workplace practices.

Figure 8. Provision of OSH-related assessments and training, by type of entity and location



Source: Data from research on working conditions in Mongolia's construction sector, 2024

Construction companies are more proactive in ensuring workplace safety compared to individual employers. They provide workers with comprehensive training and conduct medical and physical examinations both prior to starting the job and during the period of the worker's employment. This approach reflects a structured commitment to worker health and safety, which is often mandated by company policies and regulations. However, the situation requires further improvement as there are still companies that do not provide these benefits (figure 8).

In contrast, informal employers tend to place less emphasis on these preventive measures, potentially leaving workers more vulnerable to health and safety risks. Workers employed by informal brigades in Ulaanbaatar face significant gaps in OSH-related assessments and trainings. They typically do not receive any formal training and undergo minimal, if any, medical examinations. This lack of preventive measures increases the risk of accidents and health issues and underscores the need for improved oversight and enforcement of safety standards for Mongolia's construction sector.

In-depth interviewees' responses reveal a lack of compliance with OSH instructions. It is common practice to simply sign off on an OSH guidance note and ignore the process. According to some interviewees, contributing factors to this lack of compliance are the presence of small informal brigades, workers on temporary contracts (some of whom work for just one day), small-sized employers' preference for making savings on OSH costs and, most importantly, the lack of external supervision from state-level institutes that are responsible for OSH enforcement.

Most of the interviewees (24 out of 36) mentioned certain unfavourable working conditions as disadvantages. Inadequate accommodation, working long hours, staying in unfinished buildings without restrooms, working in bad weather and a lack of occupational safety are the main issues mentioned. Some in-depth interviewees said that they are exposed to high levels of fine dust and to cold, humid environments for long periods of time, which can lead to health problems. Due to exposure to dust and harmful substances, they are more likely to suffer from asthma and allergies.

Construction workers who do decoration works highlighted the severe health risks they face due to poor-quality construction materials, such as paint and putty. Some participants pointed out that it is a misconception to conclude that modern construction materials are safe for human health solely because they are deemed to be non-toxic and high quality.

WORKERS...

"Our working conditions are very bad. We work outside for long hours in the cold. I usually have problems with my kidneys and bladder. Summer is a bit better, but it's really hard because there's a lot of dust."

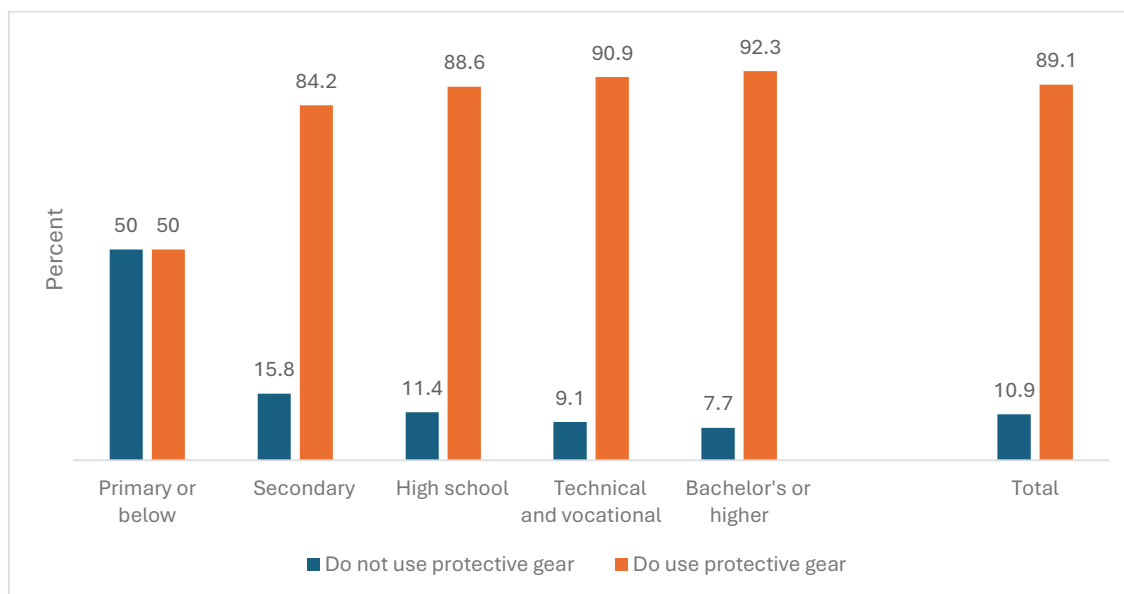
"The materials we use are often of low quality and outdated. The employer tested them with equipment and assessed them as non-toxic and safe for health. However, I know incidences of some workers who have experienced throat irritation, and one pregnant woman was hospitalized. Personally, I don't trust the evaluations and inspections conducted solely by the employer regarding workplace conditions."

"It is common for construction workers be accommodate in construction sites. Living and eating in dusty places without restrooms is unpleasant."

"Work conditions are not good. Being without access to restrooms is difficult for women. Dusts and smell of paints are unhealthy for interior decorators. We had to work in the cold when the building was not connected to the heating system."

"I am from Ulaanbaatar. I stay here (Umnugobi) in the accommodation prepared for me. Five workers must stay in one ger.¹⁹ Condition is substandard according to the Labour Law and safety rules. Subcontractors are responsible for working conditions."

Figure 9. Use of protective gear, by education level

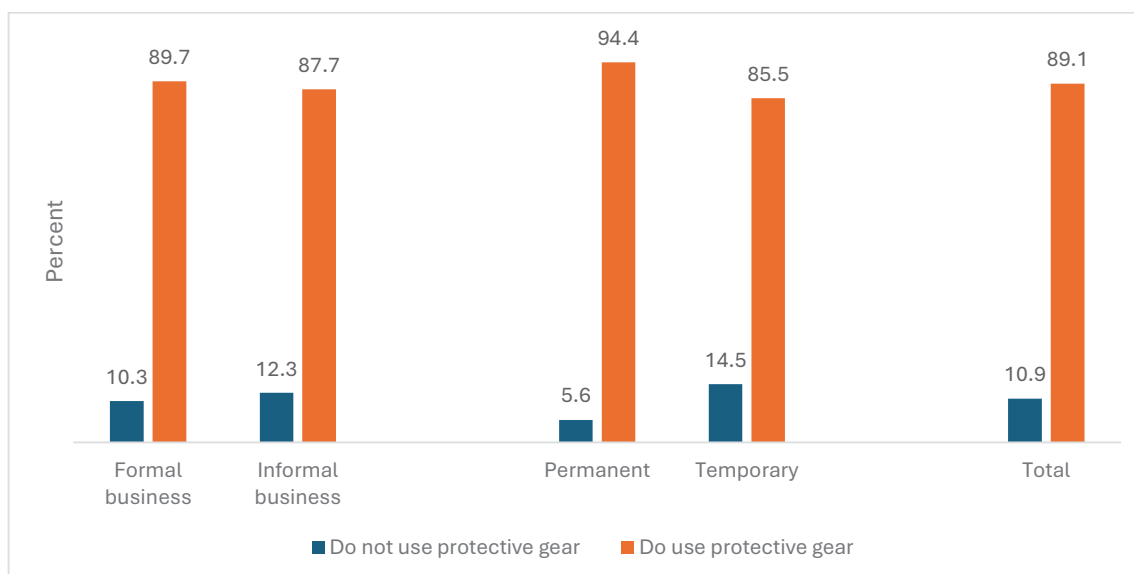


Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The overwhelmingly majority of those interviewed use protective gear (figure 9). There are no significant differences between the use of protective gear depending on the workers' characteristics, except in the case of the workers' level of education. Across all three surveyed regions, workers with higher levels of education are more likely to wear protective gear compared to workers with primary level education or lower. This trend suggests that higher levels of education may contribute to a greater awareness of workplace safety practices and the importance of personal protective equipment. It also underscores the potential impact of education in fostering a safety-conscious work culture. In contrast, workers with lower levels of education may benefit from additional training and awareness campaigns to emphasize the critical role of protective gear in preventing workplace injuries.

¹⁹ A ger is a traditional Mongolian tent.

Figure 10. Use of protective gear, by employment characteristics

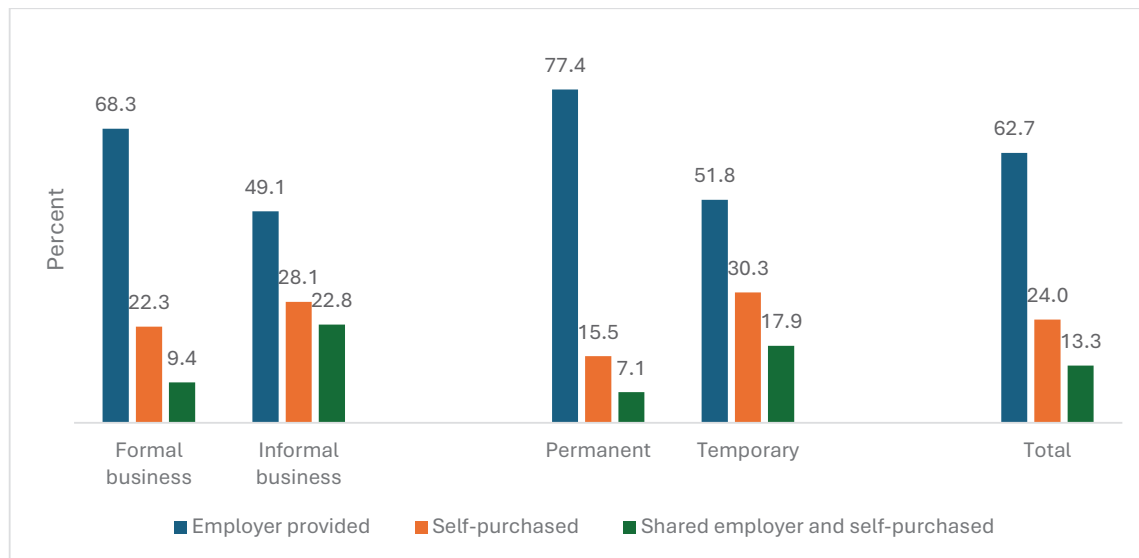


Source: Data from research on working conditions in Mongolia's construction sector, 2024

The research findings reveal similar levels of use of protective gear in formal and informal businesses, while notable differences exist based on employment type (figure 10). Permanent workers are more likely to wear protective gear compared to temporary or non-permanent workers. The difference is particularly noticeable in Orkhon, where protective gear use is below the average (82.4 per cent versus 89.1 per cent, see table A4 in the appendix). This trend suggests that permanent workers may have greater access to protective equipment and are more thoroughly integrated into workplace safety protocols.

The research highlights a clear difference in how workers acquire their protective gear, depending on their type of employer. Workers employed by companies predominantly receive their protective gear directly from their employers (68.3 per cent), reflecting a structured approach to ensuring workplace safety compliance. In contrast, 49.1 per cent of workers in informal businesses have to partially or fully fund the purchase of their own protective gear (figure 11). This practice not only places an additional financial burden on the workers but also increases the likelihood of acquiring inadequate or substandard gear, further compromising their safety on the job (Table A5).

Figure 11. Provision of protective gear, by provider



Source: Data from research on working conditions in Mongolia's construction sector, 2024

Several in-depth interviewees reported working in high-rise buildings and construction sites without the necessary protective equipment. One of them said that he worked on the upper floors of a building without a safety harness and that he was not aware that he would be working in such dangerous conditions when he first started the job.

According to in-depth interviewees, there are significant deficiencies in the standards of protective equipment, scaffolding and clothing. Tools and equipment are often of poor quality, outdated and broken. In some cases, workers reported the use of substandard construction materials that are harmful to health.

WORKERS...

"I work on a suspended crane from the 16th floor, so I always work in dangerous conditions. In our company, there are many unexpected problems, such as the crane getting stuck or suddenly falling down a few steps. With this technique, we drill into the concrete wall with a strong drill and install thermal foam. The company I worked for before paid a lot of attention to the safety of the crane. They regularly updated the lubrication and safety belts of the crane. It seems that there is not enough money here. The technical integrity of the crane equipment and tools is poor."

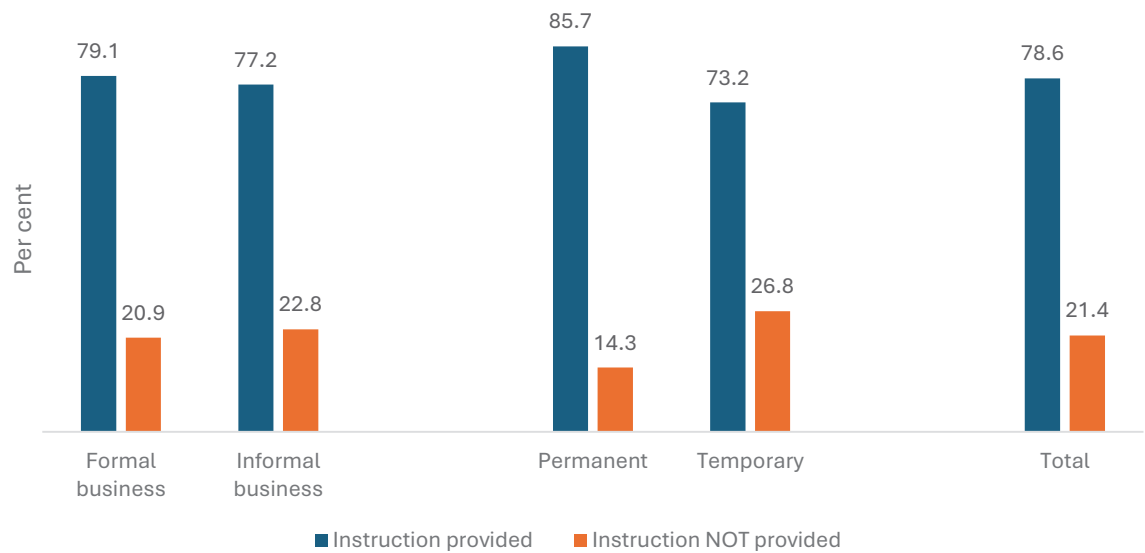
"I was made to work on the third floor without a safety harness. If I had known that I would be working in such dangerous conditions, I would not have taken this job."

"My job is risky. I have to constantly replace tools, but I have to replace them when they break or disappear. We are under pressure to complete the work quickly due to the critical nature of the electrical system in emergency situations. This can lead to fatigue when working long hours."

"Safety equipment is not provided according to standards. It is not true that safety instructions are given every day. They just sign the safety book every day. However, large groups and companies take OSH seriously and provide safety training."

“There is a standard for equipment in the OSH regulations. First of all, there is a standard for personal protective equipment. It must be updated every quarter. There is a problem in updating protective equipment every quarter, and updating equipment every time depending on the industry. Companies seem to have a problem about spending money on it.”

Figure 12. Provision of instructions for using protective gear, by employment characteristics



Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The research shows that more than one in five interviewed workers do not receive any instruction for using protective gear: results are similar in Ulaanbaatar (20 per cent) and Umnogobi (18.2 per cent) and rise in Orkhon (32.1 per cent) (table A6 in the appendix).

Workers employed by registered entities are more likely to receive instruction on the proper use of protective gear compared to those working for informal entities (figure 12 and table A6 in the appendix). Similarly, workers with a permanent contract receive more guidance on the use of protective gear in comparison to seasonal or temporary workers (figure 12 and table A6 in the appendix).

These results suggest that formal businesses and permanent employment are associated with more thorough integration of workers into safety protocols and better provision of training in the use of protective gear, further exacerbating the vulnerability of temporary and informal workers.

5.4 Employer survey

During the survey, employers were asked how contractors ensure that construction projects uphold OSH standards. Most employers indicated that they address this issue through contractual agreements. Specifically, they reported that it is common practice to include a clause in the contract requiring contractors to have a dedicated OSH expert in their team, to oversee safety measures and ensure compliance with occupational safety regulations throughout the project (table 18).

Furthermore, the employers (the representative of the company or informal brigade) emphasized that the contracts clearly state that the responsibility for implementing and maintaining safety measures lies entirely with the contractor (the subcontractor working for the company or the informal brigade). This arrangement shifts accountability for workplace safety directly onto the contractor, compelling them to adhere to safety protocols and mitigate risks. By formalizing these requirements in the contract, employers aim to create a structured approach to safety management, ensuring that safety is not overlooked or deprioritized during project execution.

Table 18. Inclusion of OSH standards in contractual arrangements, by type of entity and contractor

	Company				Informal brigade			
	General contractor		Subcontractor		General contractor		Subcontractor	
	No.	%	No.	%	No.	%	No.	%
OSH clauses specified in the contract	4	18	2	33	n/a	n/a	3	43
Each party must have an OSH engineer according to the contract	8	36	1	17	n/a	n/a	0	0
General contractor's responsibility	n/a	n/a	0	0	n/a	n/a	2	29
Has own OSH engineer	10	45	3	50	n/a	n/a	2	29
	22	100	6	100	–	–	7	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

EMPLOYERS...

“Regarding occupational health and safety, our company has a specialized contract officer, HR staff and employees with defined roles, so there are no issues with drafting contracts.”

“However, I’m not fully aware of how occupational health and safety terms are incorporated into contracts, as it’s rarely emphasized. General contractors sign agreements with subcontractors, and subcontractors then sign agreements with brigades. Occupational health and safety related provisions are not typically included in the agreements between subcontractors and brigades.”

While this strategy reflects an effort to promote accountability, it also raises questions about the adequacy of oversight and enforcement, particularly in cases where contractors may lack the resources or expertise to implement comprehensive safety measures. These findings underscore the importance of monitoring and evaluating how effectively contractors fulfil their safety obligations, as well as the potential need for additional measures to support and enforce safety compliance in Mongolia's construction sector.

Interviews with various stakeholders, including employees, employers and experts, revealed that there is a significant shortage of OSH specialists in the construction industry, as well as deficiencies in OSH specialists' knowledge and skills.

EMPLOYERS...

“Construction workers are now required to wear protective gear and helmets more than ever before. However, they must bring their own clothing. The company does not provide it. When general contractors and subcontractors enter into contracts with each other, they specify that one of them will be responsible for the OSH. The general contractor is generally fine with it. The brigades are the ones with problems.”

“Our company started using services from a consulting company specializing in OSH issues last year. That organization starts with the documentation and then comes to inspect the site. They come and inspect the site like a professional inspection organization. And when any violations are found, they notify us in writing. We eliminate the violations and they re-inspect. We are covering the necessary costs for this service.”

5.5. Forced labour

The ILO Forced Labour Convention, 1930 (No. 29), Article 2, defines forced labour as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.

Involuntary work refers to any work undertaken without the worker’s free and informed consent. Means used to compel someone to carry out involuntary work include threats and penalties imposed directly on the worker or directed at family members, co-workers and close associates. Common forms of coercion are, for example, physical or sexual violence, restriction on workers’ movements, retention of cash, assets or identity documents, withholding wages, abuse or manipulation of debt, etc.²⁰

Mongolia ratified ILO Convention No. 29 in 2005 and the country’s Constitution (1992) states that no one shall be illegally subjected to forced labour (Article 16, section 4)²¹. Moreover, article 8 of the new Labour Law (2021) prohibits forced labour and marks significant progress by regulating and protecting workers even if they have no formal contract. This is particularly relevant for the construction sector, as assistant workers are often employed without a formal contract.

Mongolia’s Criminal Code also includes provision for forced labour, addressing it as a crime. However, according to article 13.13 of the Code:

forced labour with the use of violence or threat of such, coercion of obviously detrimental condition, or subduing others by taking advantage of their wealth, health, disability, notorious family condition or other difficulties without any pay shall be punishable by a fine equal to from five thousand four hundred to twenty-seven thousand units of amount, or from two hundred and forty to seven hundred and twenty hours of community service, or a penalty of limitation of free travel right for a term from one to five years, or imprisonment for a term from one to five years.²²

²⁰ ILO, Hard to See, Harder to Count: Handbook on Forced Labour Surveys, 2024.

²¹ https://www.constituteproject.org/constitution/Mongolia_2001

²² <https://legislationline.org/taxonomy/term/25125>

That is, to be considered as a crime under the national legislation, in addition to being involuntary and carried out under an actual or threat of penalty (as per ILO Convention No. 29), the work shall not be remunerated.

We therefore provide two indicators of forced labour, one based on international standards and one based on national legislation.

5.5.1. Forced labour based on international standards

Out of the 220 interviewed workers, 50 reported some form of involuntary work and 35 reported some form of coercion, resulting in 32 cases of forced labour based on international standards, which represent 14.5 per cent of our sample (table 19). Adult male workers aged 18–44 years old are more likely to be in forced labour and higher levels of education do not seem to protect them from exploitation.

Table 19. Forced labour based on international standards, by demographic characteristics

		In forced labour		Not in forced labour		All workers	
		No.	%	No.	%	No.	%
Sex	Male	31	17	152	83	183	100
	Female	1	3	36	97	37	100
Age	15–17 years	0	0	6	100	6	100
	18–24 years	8	30	19	70	27	100
	25–34 years	9	14	57	86	66	100
	35–44 years	10	15	56	85	66	100
	45–54 years	3	9	32	91	35	100
	55+ years	2	10	18	90	20	100
Ethnicity	Khalkha	27	14	160	86	187	100
	Other	5	15	28	85	33	100
Education	Bachelor's degree or higher	10	15	55	85	65	100
	Technical and vocational	3	27	8	73	11	100
	Secondary	19	13	123	87	142	100
	Primary or below	0	0	2	100	2	100
Migration status	International migrant	0	0	1	100	1	100
	Internal migrant	7	7	89	93	96	100
	Non-migrant	25	20	98	80	123	100
Total		32	14.5	188	85.5	220	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

Forced labour is mostly found in Ulaanbaatar (31 cases), while no cases are reported in Orkhon. There are limited differences by type of employment, with temporary and seasonal workers slightly more likely to be in forced labour than permanent workers. Concerning contractual arrangements, most of the workers in forced labour have an oral agreement (23 out of 32) and 12.5 per cent of workers with no contract are in forced labour (table 20).

Table 20. Forced labour based on international standards, by employers' and work characteristics

		In forced labour		Not in forced labour		All workers	
		No.	%	No.	%	No.	%
Entity location	Orkhon	0	0	34	100	34	100
	Ulaanbaatar	31	21	119	79	150	100
	Umnugobi	1	3	35	97	36	100
Type of entity	General contractor	6	6	87	94	93	100
	Contractor with special permit	0	–	0	–	0	100
	Subcontractor	2	5	41	95	43	100
	Informal brigade	24	29	60	71	84	100
Type of employment	Permanent	11	12	78	88	89	100
	Temporary	10	17	48	83	58	100
	Seasonal	11	15	62	85	73	100
Contractual arrangement	Written contract	7	8	82	92	89	100
	Oral agreement	23	20	92	80	115	100
	No contract	2	12.5	14	87.5	16	100
Total		32	14.5	188	85.5	220	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

When considering the working conditions, workers in forced labour earn less and work longer hours than workers who are not in forced labour. However, they seem to be slightly less likely to suffer from injuries in the workplace (table 21).

Table 21. Working conditions, by status in forced labour based on international standards

	In forced labour	Not in forced labour
All workers	32	188
Average monthly earnings (MNT)	2 392	3 163
Average daily working hours	10.2	9.5
Average weekly working days	6.5	6.3
Exposure to injuries (number of workers reporting work injuries)	4	7

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

5.5.2. Forced labour based on national legislation

As mentioned previously, Mongolia's national legislation adds the condition of no pay to the ILO's definition of forced labour. Among workers in forced labour by international standards, there were only two cases where workers received no payment: one without a formal agreement; the other with a formal agreement with the employer.

The worker with no formal agreement reported working temporarily for his current employer and receiving his salary daily. He had not been paid by one of his previous employers. During the in-depth interview, he revealed the severe conditions of his previous employment. He was asked to work without a safety harness at the height of the third floor of the building and was living in the substandard accommodation provided by the employer.

Another case where payments were not made involved a retired engineer who was hired by his current employer to fulfil the company's special licence requirement. We conducted an in-depth interview with him. Although he does have a formal employment agreement, he has not been paid for a year. The hope that he would be paid kept him working for a year, and he felt unable to quit the job due to his year-long "wage arrears".

5.5.3. Involuntariness

The research indicates that workers experience more than one condition of involuntary work, with the more frequently recurring situations being working in a location that differs from what was previously agreed and working conditions that are more hazardous than previously agreed (table 22).

Table 22. Involuntary work conditions

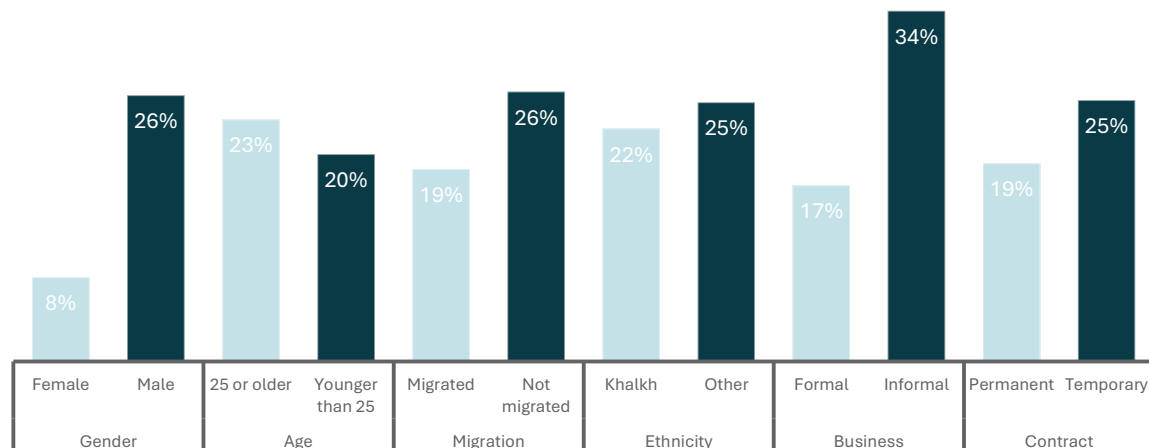
	No.	%
Location different from what was previously agreed	20	62.5
Conditions more hazardous than previously agreed	8	25
Working conditions differ from what was promised	7	21.9
Extra tasks not previously agreed	6	18.7
Longer hours than previously agreed	5	15.6

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

There is a significant difference across worker groups in terms of the incidence of involuntary work. Male, migrant workers and ethnic groups other than Khalkha have a higher incidence of involuntary work than their counterparts (figure 13).

In terms of employment characteristics, temporary workers and workers in informal businesses are more likely to experience involuntary work than permanent workers and workers in formal businesses.

Figure 13. Involuntary work, by workers' characteristics



Source: Data from research on working conditions in Mongolia's construction sector, 2024

In-depth interviews revealed that it was common for supervisors and managers to require workers to perform unpaid tasks for their personal benefit, thereby increasing the workload on the rest of the team. Some workers in forced labour seemed to accept additional tasks or changes in the scope of their jobs as typical of the construction industry and workers involved in installation and decoration tasks noted that increases in workloads were almost an unwritten rule.

WORKERS IN FORCED LABOUR...

“I am a full-time employee with a regular salary. However, during my shift leave, I am working on plumbing and wiring work on another building and cannot get paid. There are also employers in the construction industry who pay salaries and those who do not pay.”

“Construction jobs pay well, but there are often cases where you don’t get paid or get paid less. My working conditions were worse than they initially presented to me. I was made to work much longer hours than I was originally promised. I worked 13 hours a day. I also had to travel to other locations to do a lot of work.”

“I left my previous job because I wasn’t getting paid. I was supposed to get 4 million tugriks in total. Construction work’s conditions can change. Decoration tasks involve a lot of extra work but are undervalued. There are cases where some people just keep working at the original agreed-upon wage when the workload increases.”

“I haven’t received my salary for a year now. They showed me their accounts and accounting troubles, saying that VAT, customer and supplier debts are being demanded, but I haven’t been paid for a year. My household is managing as my children are grown up, live separately and my wife receives a high pension.”

“When I was finishing 12th grade, my classmate and another student who was a year younger than me went to the countryside to do some exterior finishing work for 2–3 days, but we ended up working for 23 or 24 days. I was supposed to get 3 million tugriks as a salary, but I got 500,000 tugriks. I couldn’t get my money and I was in an embarrassing situation, as someone who lied to my family.”

5.5.4. Coercion

Our research has uncovered 35 workers who were threatened with or experienced violence, isolation, surveillance outside working hours, debt, denial of basic needs (food, water, sleep, medical care), deportation, contract termination, document or wage withholding, workplace confinement, and offered drugs or alcohol by the employer. Most of the workers in forced labour were compelled to work by means of withholding wages, payments or other entitled benefits (30). Others were threatened with being fired (5) and some experienced debt manipulation (4) (table 23).

Table 23. Types of coercion faced by workers in forced labour

	No.	%
Forced labour	32	100.0
Withholding of wages, payment as subcontractor or other benefits	30	93.8
Threatened with being fired	5	15.6
Deliberately put (further) into debt through un-agreed or excessive charges or supposed workplace violations	4	12.5
In completely isolated region/place, with no other work options	2	6.3
Monitored outside working hours (for example, difficulty contacting family or friends)	2	6.3
Physically prevented from leaving the workplace outside working hours	2	6.3
Family members suffered, or been threatened with, physical violence to force worker to do the job	1	3.1
Suffered or been threatened with sexual violence	1	3.1
Threats to deny food, water or sleep	1	3.1
Threats to deny medical care	1	3.1

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

The majority of those who participated in the in-depth interviews reported receiving lower wages than initially agreed or not being paid at all or being made to do additional unpaid work. Many stated that such practices are common in the construction industry. Of the 13 individuals in forced labour who participated in the in-depth interviews, 11 shared their personal experiences. The most common issue was wage delays, which caused frustration and ultimately forced workers to quit.

Some interviewees reported that they were trapped in debt through purchasing an apartment through their employer, being then unable to leave their job for 5–10 years. Others reported their wages being withheld and continuing to work in the hope of eventually being paid, which led to accumulating debts that ultimately tied them to the employer. Finally, others reported that employers confiscated and withheld engineers' documents required for licensing.

It is important to note that most interviewees reported these situations as common practices in the industry rather than personal experiences. Some in-depth interviewees claimed that such cases did not occur within their organizations.

In contrast, interviews with employers revealed a different perspective, in which the employers are justified in withholding wages to a certain extent. For instance, some employers mentioned that workers often lacked commitment to sustaining job stability, left after acquiring certain skills or quit once they received their daily wages. Other challenges included clients withholding payments due to dissatisfaction with work quality or finding excuses not to pay. General contractors and large, reputable companies with long-standing operations were noted to engage in deceptive practices less frequently, as they prioritized maintaining their reputation.

However, in recent years, labour shortages and the shift to daily wage systems have reportedly reduced the number of cases where workers are unable to collect their wages.

WORKERS WITH FORCED LABOUR CASES...

“I purchased an apartment through an instalment plan with my current employer. I am not able to leave my job for the next 10 years. Out of a monthly salary of 1,800,000 MNT, 1,000,000 MNT is deducted for housing payments, and the remainder barely covers social security contributions, leaving no take-home pay. My wife earns a salary, which supports the family. When asked if I could switch to a higher-paying job to pay off the mortgage, he responded I had signed a 10-year contract.”

“I provided my documents to have my social security contributions reinstated. The company needed an experienced engineer’s documents to apply for a special licence, so they used mine. However, I later got back my documents telling the employer I needed them for a tender at another organization.”

5.5.5. Trafficking for forced labour

Article 3 of the Palermo Protocol defines trafficking for forced labour as “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion ... [or] deception ... for the purpose of exploitation.”²³ As such, it is a subset of forced labour.

Mongolia ratified the Palermo Protocol in 2008. Since then, it has been making significant efforts to eliminate trafficking. The Law on Combating Human Trafficking and the Law on Witness and Victim Protection were adopted in 2012 and 2013, respectively, and a National Sub-council on Combating Trafficking in Persons was established to regulate activities to combat and prevent trafficking and to provide professional guidance.

The survey results indicate that 15 workers were trafficked for labour exploitation, representing more than half of those in forced labour according to international labour standards (table 24). Most of them were forcibly recruited or deceived.

Table 24. Trafficking for forced labour

	No.
Forced or deceptive recruitment	7
Transported for forced labour	—
Transferred or received for forced labour	4
Harboured for forced labour	4

Source: Data from research on working conditions in Mongolia’s construction sector, 2024.

²³ United Nations, Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, 2000, art. 3.

Younger workers (those aged 18–24 and 25–34 years old) are more likely to experience trafficking than the other age groups. Workers with a bachelor's degree or higher education are less likely to experience trafficking for forced labour than their less well-educated peers (table 25).

Table 25. Trafficking for forced labour, by demographic characteristics

		Trafficked for forced labour		Total forced labour	
		No.	%	No.	%
Sex	Male	14	45	31	100
	Female	1	100	1	100
Age	15–17 years	0	–	0	100
	18–24 years	5	63	8	100
	25–34 years	4	44	9	100
	35–44 years	2	20	10	100
	45–54 years	2	67	3	100
	55+ years	2	100	2	100
Ethnicity	Khalkha	12	44	27	100
	Other	3	60	5	100
Education	Bachelor's degree or higher	4	40	10	100
	Technical and vocational	0	0	3	100
	Secondary	11	58	19	100
	Primary or below	0	–	0	100
Migration status	International migrant	0	–	0	100
	Internal migrant	4	57	7	100
	Non-migrant	11	44	25	100
Total		15	46.9	32	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024.

Among the workers in forced labour, the research identified more cases of trafficking among those with temporary contracts and those employed by subcontractors. Moreover, having a written contract does not seem to protect workers from being trafficked for forced labour, with four workers being trafficked out of seven in forced labour (table 26).

Table 26. Trafficking for forced labour, by employers' and work characteristics

		Trafficked for forced labour		Total forced labour	
		No.	%	No.	%
Entity location	Orkhon	0		0	100
	Ulaanbaatar	15	48	31	100
	Umnugobi	0	0	1	100
Type of entity	General contractor	3	50	6	100
	Contractor with a special permit	0		0	100
	Subcontractor	2	100	2	100
	Informal brigade	10	42	24	100
Type of employment	Permanent	5	45	11	100
	Temporary	5	50	10	100
	Seasonal	5	45	11	100
Contractual arrangement	Written agreement	4	57	7	100
	Oral agreement	10	43	23	100
	No agreement	1	50	2	100
Total		15	47	32	100

Source: Data from research on working conditions in Mongolia's construction sector, 2024

5.5.6. Characteristics of the perpetrator

Perpetrators are predominantly employers (31), and in many instances are acquainted with the workers in forced labour (19). There is one case in which the perpetrator was a recruiter. Moreover, perpetrators are mostly male (30) and often are aged 40 years old or more (25). The majority are Mongolians and have the same ethnicity as the workers in forced labour (30).

Six employers of nine workers in forced labour filled out the semi-structured survey, indicating that they withhold wages and other payments to workers when the job was not completed (1), when the client did not pay (4) and for both reasons (1). Only one employer of one worker in forced labour agreed to participate in an in-depth interview. That employer has been working in the construction sector since 2000 and is a leader of an informal brigade. He usually hires workers on a daily basis. Although his team operates informally, it was evident from the interview that they are responsible for managing entire construction projects. For instance, at the time of the interview, the employer was working on a four-storey office and retail building, employing three people as subcontractors. Additionally, he was working on the project without a formal contract, stating that the client was a trusted and well-known individual, so he was confident that no issues would arise. When asked how OHS is ensured, he replied that it is usually specified in the contract. There have been no serious accidents so far, and he noted that hiring an OHS engineer for a brigade would be too costly.

5.5.7. Reporting

Only 2 workers out of 32 in forced labour reported their experience to official authorities (the police and the social security authority). The main reason for not reporting an issue is that workers either consider the problem insufficiently important to report or are confident that

they can resolve it themselves. In some instances (five), workers do not trust the authorities' ability to solve the problem (table 27).

Table 27. Reasons for not reporting

Reason for not reporting	Observations
The problem is/was not important enough	13
I am/was confident that I can easily resolve it by myself	8
I do/did not know where to go to report the issue	10
I do/did not trust the authorities	1
I do/did not think they can help	4
Other	2

Note: Multiple choices were allowed and workers gave more than one reason for not reporting to official authorities.
Source: Data from research on working conditions in Mongolia's construction sector, 2024

Those 13 workers who did not make a report to the authorities experienced the following types of coercion: family members suffered or threatened with physical violence (1), sexual violence (1), monitored outside working hours (1), were indebted through unagreed or excessive charges or supposed workplace violations (1), withheld wages (11) and threatened with being fired (2).

Among the in-depth interviewees who reported not receiving their wages, only a couple of them filed formal complaints. There have been no cases where legal action through the courts resulted in a favourable outcome for the workers. Many workers believe that filing a lawsuit is time-consuming and that the case is unlikely to be resolved in their favour. Instead of reporting the issue, some workers resort to retaining tools and equipment as compensation.

WORKERS WITH FORCED LABOUR CASES...

"I've been trying to get a salary that I haven't received for a few times. They say they'll give it to me when the money comes in."

"I didn't contact the appropriate authorities to get my salary. The police don't care. I contacted the police about receiving a large amount of money from my employer two years ago. They said the case was closed after a while."

"There are cases where construction workers let go of their money if they can't get it, or take tools and equipment instead of their salary."

"I tried to contact the police about my salary. The police don't care because it's a civil matter. But I heard that the lawsuit is usually decided on the side of the company."

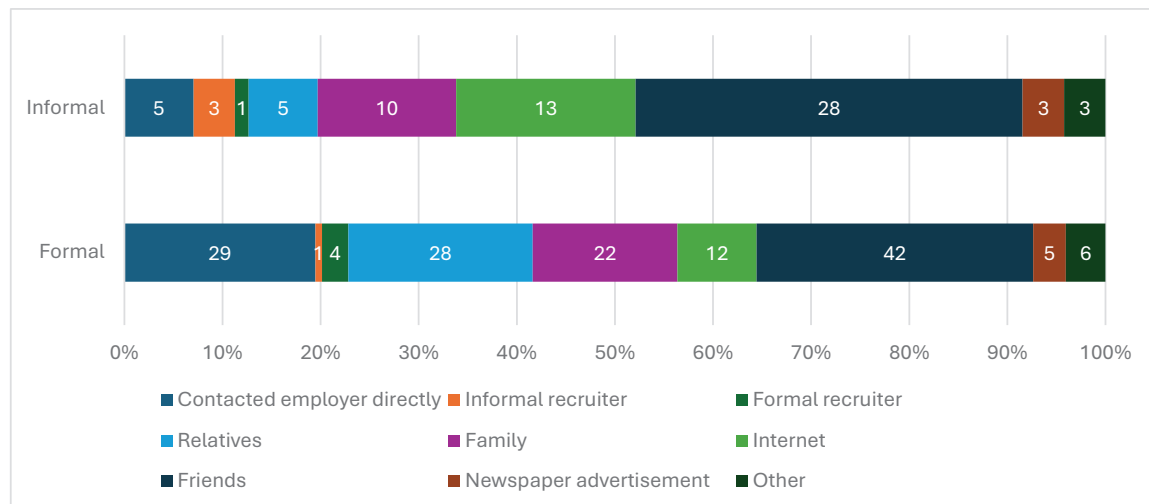
"If you file a complaint with the police, the client, who is a wealthy, large company, will find flaws in the work of small brigades and blame them."

5.6 Recruitment

There is a clear difference in the recruitment approach of formal and informal businesses. Advertisement was the main recruitment route for companies, while approaching acquaintances was the main route for informal brigades. What is striking is the reliance on personal networks in both formal and informal businesses, with most employees searching for jobs through their relatives, family and friends (figure 14). Similar results are seen on the employers' side: 56.1 per cent of respondents recruited employees through personal connections, whereas only 14.6 per cent used open job postings and formal selection processes (table A2 in the appendix).

Direct contact with employers is the next most common job-search method for employees in formal businesses, while internet search is the next most common method for employees in informal businesses.

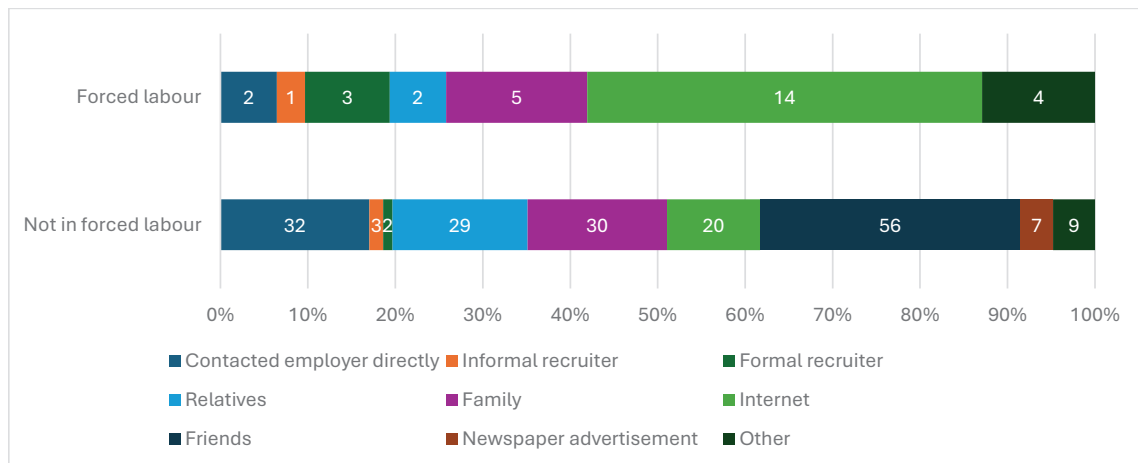
Figure 14. Job-search methods of employees



Source: Data from research on working conditions in Mongolia's construction sector, 2024

Figure 15 compares the job-search method of employees in forced labour with those not in forced labour. There is a stark difference in the prevalence of internet searches with workers in forced labour more likely to use the internet than workers who are not in forced labour. This finding suggests that internet searches could play a role in increasing vulnerability to forced labour, by exposing workers to deceptive recruitment tactics and misinformation.

Figure 15. Job-search methods of employees, by forced labour status



Source: Data from research on working conditions in Mongolia's construction sector, 2024

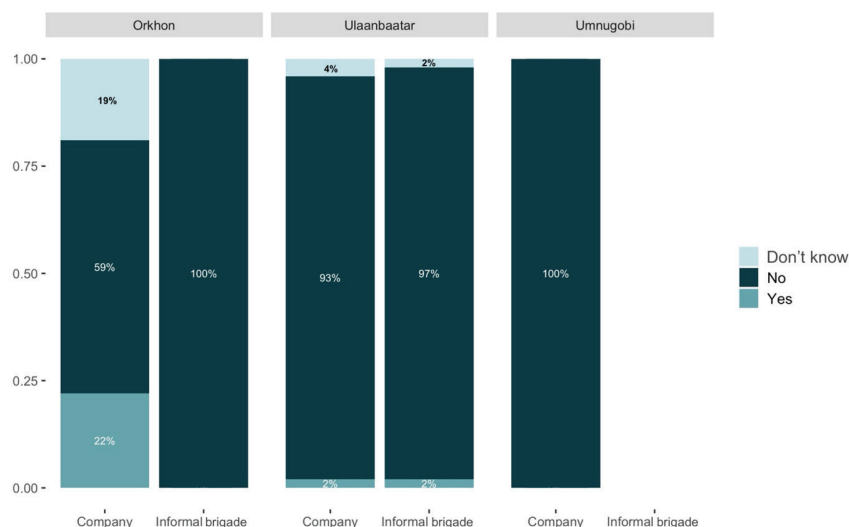
5.7. Freedom of association and collective bargaining

The Construction Sector Trade Union (CSTU) has about 3,000 members. According to the CSTU chairman, few entities have trade unions. The CSTU is concerned about occupational safety in the construction sector and has been trying to reach out to employers, but employers are reluctant to engage with the union. In 2024, the CSTU invited brigades in the construction sector to attend training on occupational safety and health; however, only a dozen brigades participated out of several hundred that were invited.

Similar results are found by the workers' survey, underscoring a lack of trade unions in Mongolia's construction sector, with the issue being particularly pronounced in Umnugobi. In this region, not a single worker reported the presence of a trade union at their workplace, reflecting a complete absence of organized worker representation (figure 16).

In contrast, some workers employed by companies in Orkhon (22 per cent) and Ulaanbaatar (2 per cent) reported that trade unions were present in their workplaces. However, even in these cases, the representation appears to be minimal, suggesting that unionization is far from widespread even among corporate-employed workers.

Figure 16. Presence of active trade unions in the workplace, by region and type of business



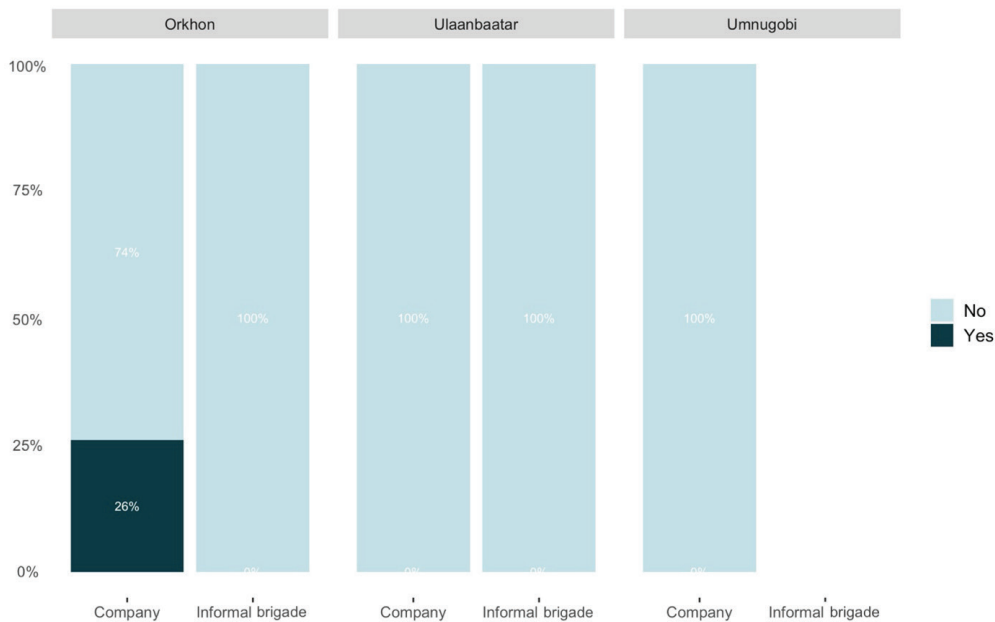
Source: Data from research on working conditions in Mongolia's construction sector, 2024

The survey results reveal a striking lack of unionization among construction workers in Mongolia (figure 17). This indicates a widespread absence of collective bargaining mechanisms and organized worker representation in the construction sector.

The lack of unionization is concerning, as unions play a crucial role in advocating for workers’ rights, improving workplace safety and negotiating better wages and working conditions. Without unions, workers may have limited avenues for voicing their concerns or addressing systemic issues, such as inadequate safety measures and unfair labour practices.

This trend highlights the need to explore and address the barriers to unionization in the construction industry, whether they stem from regulatory challenges, employer resistance or a lack of awareness among workers about the benefits of union membership. Strengthening union presence could contribute significantly to improving occupational safety and overall working conditions in Mongolia’s construction sector.

Figure 17. Is the worker in a trade union?



Source: Data from research on working conditions in Mongolia’s construction sector, 2024.

► 6. Conclusions

Mongolia ratified the ILO Conventions on forced labour (No. 29 and No. 105) in 2005 and has implemented concrete measures to align its national legislation with them. Moreover, the country has invested significant efforts in systematically assessing, measuring and analysing forced labour with a view to developing evidence-based and targeted policy responses.

Against this backdrop, a national consultation identified forced labour in the construction sector as a key area of concern, highlighting the need for reliable evidence of its presence and characteristics to support the development of targeted interventions. In response, the ILO supported research on working conditions in Mongolia's construction sector to assess compliance with Convention No. 29.

The research adopted a mixed-method approach that, while not statistically representative, provides evidence of the presence of forced labour and offers valuable insights into working conditions in the construction sector. In particular, the research revealed significant gaps in labour rights enforcement, occupational safety and workers' access to justice, particularly in informal labour arrangements. Moreover, children were found to be working in the construction sector, which constitutes child labour that must be eliminated.

Most of the workers interviewed – comprising seasonal (33.2 per cent) and temporary workers (26.4 per cent) – are employed under non-permanent arrangements, highlighting a general lack of stable employment. Workers with a bachelor's degree or higher level of education are more likely to secure a permanent job, also due to the requirement for construction companies to employ full-time engineers in order to obtain a special licence.

More than half of the workers interviewed reported having only oral agreements, while some (16 individuals) had no agreement at all, highlighting the widespread absence of formal contractual arrangements and a critical gap in enforcement within the sector.

Although the new Labour Law limits adults' working time to a maximum of 56 working hours per week and restricts overtime to 4 hours per day, excessive working hours are a pervasive issue in the construction sector – across both formal and informal enterprises – particularly for temporary and seasonal workers, who report an average of 63 hours per week, compared to 54 hours for those with permanent contracts.

Employees in the construction sector earn an average monthly wage of 3.05 million tugriks, with half of the workforce earning more than 2.5 million tugriks. Notably, wages tend to be lower in the formal sector compared to the informal one, largely due to the fact that permanent workers in formal enterprises continue to receive salaries during the off-season. The primary issue concerning wages in the construction sector is delayed payment, affecting more than one quarter of employees. Employers often attribute these delays to late payments from general contractors or subcontractors, which in turn hinder their ability to disburse wages on time.

While only a limited number of employees reported having experienced work-related injuries or accidents, non-compliance with OSH regulations emerged as the most pressing concern

during in-depth interviews. Workers reported prolonged exposure to harmful conditions, including high levels of fine dust and cold, humid environments and use of poor-quality materials, which pose serious risks to their health. Moreover, the practice of subcontracting to small brigades, which often operate informally, results in widespread violations of OSH as contracts generally exclude OSH clauses. These findings underscore the urgent need to strengthen OSH enforcement mechanisms, ensure regular workplace inspections and establish clear standards for the quality of construction materials used, in order to safeguard workers' health and well-being. However, the Ministry of Family, Labour and Social Protection, which is responsible for labour inspections, continues to face shortages of labour inspectors and other essential resources.

Most interviewed workers (196 out of 220) reported using protective gear, with those holding higher levels of education more likely to do so – suggesting that education may play a key role in fostering awareness of occupational safety practices and the importance of personal protective equipment (PPE). Permanent workers were also more likely to use protective gear and to have received it directly from their employer, indicating better access to PPE and greater integration into workplace safety protocols. In contrast, workers in informal businesses are more likely to have to purchase their own protective gear, meaning that they not only bear an additional financial burden but also face increased risk of acquiring inadequate or substandard equipment, thereby further compromising their safety on the job.

The research also reveals the presence of forced labour, which is defined by international labour standards as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.²⁴

Mongolia ratified ILO Convention No. 29 in 2005 and its Constitution of 1992 explicitly prohibits forced labour, stating that no one shall be illegally subjected to such practices (Article 16, section 4). Article 8 of the 2021 Labour Law further reinforces this commitment by prohibiting forced labour and article 13.13 of the Criminal Code criminalizes forced labour and prescribes penalties. However, the Criminal Code introduces a limitation by requiring the condition of unpaid work in conjunction with involuntary labour under coercion or threat, which has the effect of narrowing the scope of protection compared to international standards.

Out of the 220 workers interviewed, the research identified 32 cases – equivalent to 14.5 per cent of the sample – that meet the criteria of forced labour based on international standards. Most cases of forced labour were found in Ulaanbaatar (31). Among those in forced labour, two workers reported receiving no payment for their work, qualifying as cases of forced labour punishable under article 13.13 of the Criminal Code, and 15 were identified as trafficked for labour exploitation, most of them being forcibly recruited or deceived.

It is predominantly male, and younger, workers in forced labour who are less likely to have a written labour agreement and more likely to work in informal businesses with fewer employees. Despite working longer hours, they earn significantly less than their counterparts.

Workers in forced labour often experience more than one condition of involuntary work, with the more common being working in a different location to that previously agreed and in working conditions that are more hazardous than previously agreed. Interestingly, some workers in forced labour seemed to accept additional tasks or changes in their job scope as

²⁴ ILO Forced Labour Convention, 1930 (No. 29), Art. 2.

characteristic of the construction industry. Withholding payment was the most frequent form of coercion. In some instances, workers reported that they were trapped in debt due to purchasing an apartment through their employer and then being unable to leave their job for 5–10 years; others reported that their engineer's documents had been confiscated by the employer.

Workers in forced labour are more likely to use the internet to look for jobs than workers who are not in forced labour. This suggests that internet searches could play a role in increasing vulnerability to forced labour, by exposing workers to deceptive recruitment tactics and misinformation in their job search.

Only 2 out of the 32 workers identified as being in forced labour reported their experience to official authorities, such as the police or the social security authority. The primary reasons for not making a report included perceptions that the issue was not serious enough to warrant formal action or a belief that it could be resolved independently. Additionally, five workers cited a lack of trust in the authorities' ability to address the problem effectively.

Labour union membership is virtually non-existent among the surveyed workers, particularly those engaged in informal employment arrangements, with the exception of some union presence in Orkhon province. This lack of unionization significantly undermines workers' ability to collectively advocate for their rights, negotiate better working conditions and hold employers accountable for compliance with labour standards.

These findings highlight an urgent need for strengthened legal protections and monitoring and enforcement mechanisms, and policies to promote decent working conditions in the construction sector.

► 7. Recommendations

- Ensure that all forms of forced labour, regardless of payment status, are adequately addressed in line with international obligations. In particular, revise the definition of forced labour in the Criminal Code to remove the requirement for work to be unpaid in order to ensure full alignment with ILO Convention No. 29, thereby encompassing all situations where work or service is extracted under the menace of a penalty and without voluntary consent.
- Prioritize the protection of non-permanent and informal workers – such as seasonal and temporary workers – by strengthening their access to legal rights, social protection and occupational safety measures. This includes ensuring equal treatment in terms of wages, working hours and access to personal protective equipment, regardless of contract type. Targeted outreach, awareness-raising and tailored grievance mechanisms are also essential to ensure that these workers can exercise their rights effectively.
- Strengthen enforcement mechanisms for labour-related legislation nationwide, particularly relating to working time regulations and OSH, and ensure that regular workplace inspections are carried out. Labour inspections and enforcement mechanisms should be adapted to better detect and respond to the vulnerabilities faced by non-permanent workers, who are often excluded from formal workplace protections.
- Establish clear standards for the quality of construction materials used in order to safeguard workers' health and well-being.
- Effectively allocate human and financial resources to ensure regular and efficient labour inspections. Study international best practices in this area for effective implementation.
- Disseminate knowledge and information on forced labour and OSH to stakeholders in the construction sector. Specifically, develop and distribute simplified materials for workers to enhance their understanding.
- Explore affordable ways to conduct awareness-raising campaigns using social media platforms to reach a broader audience and use online tools to raise construction workers' awareness of decent work conditions.
- Ensure stronger regulation and monitoring of online recruitment platforms, as well as public awareness campaigns to help workers identify and avoid fraudulent job offers.
- Build trust in enforcement institutions, improve victim-centred reporting mechanisms and raise awareness about the seriousness of forced labour and the available avenues for redress.
- Develop balanced and equitable solutions to address potential rights violations when contracts are made between general contractors and subcontractors through dialogue with workers, informal brigades, large enterprises and government representatives.
- Develop and implement effective mechanisms to formalize informal brigades, ensuring their registration, regulation and integration into the formal economy, with access to legal protections, social security and compliance with labour standards.
- Prioritize the strengthening of workers' access to freedom of association and support the development of trade unions to promote safer and more equitable labour practices.

► 8. References

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► 9. Appendix

Table A1. Additional descriptive statistics of employers

	Observations	Mean	Median	St. dev.	Min	Max
Number of permits	25	3.88	4	2.62	1	7
Number of total workers	38	16.97	13	17.79	3	100
Temporary worker share	38	0.4	0.48	0.32	0	0.83
Number of subcontractors	22	3.27	2.5	2.39	1	8

Source: Data from research on working conditions in Mongolia's construction sector, 2024

Table A2. Recruitment channels, employers

Recruitment channel	No.	%
Job advertisement and selection by company's rules	6	14.6
Job advertisement and selection by company's owners/myself	19	46.3
Through acquaintance	23	56.1
Other	4	9.8
Total	41	

Table A3. Workers' exposure to occupational injuries

		No occupational injury		Occupational injury	
		No.	%	No.	%
Sex	Female	36	97.3	1	2.7
	Male	173	94.5	10	5.5
Age	15–17 years	6	100	–	–
	18–24 years	25	92.6	2	7.4
	25–34 years	64	97.0	2	3.0
	35–44 years	61	92.4	5	7.6
	45–54 years	33	94.3	2	5.7
	55+ years	20	100	–	–
Ethnicity	Khalkha	178	95.2	9	4.8
	Other	31	93.8	2	6.2
Education	Bachelor's degree or higher	65	100	–	–
	Technical and vocational	10	90.9	1	9.1
	Secondary	132	93.0	10	7.0
	Primary or below	2	100	–	–
Migration status	International migrant	1	100	–	–
	Internal migrant	92	95.8	4	4.2
	Non-migrant	116	94.3	7	5.7
Location	Orkhon	33	97.1	1	2.9
	Ulaanbaatar	141	94.0	9	6.0
	Umnugobi	35	97.2	1	2.8

Employer type	Formal business	149	96.1	6	3.9
	Informal business	60	92.9	5	7.7
Work type	Permanent	84	94.4	5	5.6
	Temporary	125	95.4	6	4.6
Total		209		11	

Source: Data from research on working conditions in Mongolia's construction sector, 2024

Table A4. Worker's usage of protective gear on the work site

		Do not use protective gear		Do use protective gear	
		No.	%	No.	%
Sex	Female	2	5.4	35	94.6
	Male	22	12.0	161	88.0
Age	15–17 years	–	–	6	100.0
	18–24 years	6	22.2	21	77.8
	25–34 years	10	15.2	56	84.8
	35–44 years	3	4.5	63	95.5
	45–54 years	4	11.4	31	88.6
	55+ years	1	5.0	19	95.0
Ethnicity	Khalkha	19	10.2	168	89.8
	Other	5	15.6	28	84.4
Education	Bachelor's degree or higher	5	7.7	60	92.3
	Technical and vocational	1	9.1	10	90.9
	Secondary	17	12.0	125	88.0
	Primary or below	1	50.0	1	50.0
Migration status	International migrant	–	–	1	100.0
	Internal migrant	12	12.5	84	87.5
	Non-migrant	12	9.8	111	90.2
Location	Orkhon	6	17.6	28	82.4
	Ulaanbaatar	15	10.0	135	90.0
	Umnugobi	3	8.3	33	91.7
Employer type	Formal business	16	10.3	139	89.7
	Informal business	8	12.3	57	87.7
Work type	Permanent	5	5.6	84	94.4
	Temporary	19	14.5	112	85.5
Total		24	10.9	196	89.1

Source: Data from research on working conditions in Mongolia's construction sector, 2024

Table A5. Provision of protective gear, by provider

		Employer provided		Mixture of both		Self-purchased	
		No.	%	No.	%	No.	%
Sex	Female	20	54.1	6	16.2	9	24.3
	Male	103	56.3	20	10.9	38	20.8
Age	15–17 years	3	50.0	2	33.3	1	16.7
	18–24 years	18	66.7	2	7.4	1	3.7
	25–34 years	42	63.6	8	12.1	6	9.1
	35–44 years	34	51.5	12	18.2	17	25.8
	45–54 years	17	48.6	1	2.9	13	37.1
	55+ years	9	45.0	1	5.0	9	45
Ethnicity	Khalkha	13	40.6	7	21.9	7	21.9
	Other	110	58.3	19	10.2	40	21.4
Education	Bachelor's degree or higher	43	66.2	8	12.3	9	13.8
	Technical and vocational	5	45.5	3	27.3	2	18.2
	Secondary	75	52.8	15	10.6	35	24.6
	Primary or below	–	–	–	–	1	50.0
Migration status	International migrant	1	100.0	-	-	-	-
	Internal migrant	50	52.1	11	11.5	23	24.0
	Non-migrant	72	58.5	15	12.2	24	19.5
Location	Orkhon	16	47.1	3	8.8	9	26.5
	Ulaanbaatar	85	56.7	20	13.3	30	20.0
	Umnugobi	22	61.1	3	8.3	8	22.2
Employer type	Formal business	95	61.3	13	8.4	31	20
	Informal business	28	43.1	13	20.0	16	24.6
Work type	Permanent	65	73.0	6	6.7	13	14.6
	Temporary	58	44.3	20	15.3	34	26.0
Total		123		26		47	

Table A6. Provision of instruction on using protective gear, by worker and employment characteristics

		Yes		No	
		No.	%	No.	%
Sex	Female	28	80.0	7	20.0
	Male	126	78.3	35	21.7
Age	15–17 years	3	50.0	3	50.0
	18–24 years	20	95.2	1	4.8
	25–34 years	47	83.9	9	16.1
	35–44 years	47	74.6	16	25.4
	45–54 years	23	74.2	8	25.8
	55+ years	14	73.7	5	26.3
Ethnicity	Khalkha	132	78.6	36	21.4
	Other	22	77.8	6	22.2
Education	Bachelor's degree or higher	52	86.7	8	13.3
	Technical and vocational	6	60.0	4	40.0
	Secondary	95	76.0	30	24.0
	Primary or below	1	100.0	–	0.0
Migration status	International migrant	1	100.0	–	0.0
	Internal migrant	72	85.7	12	14.3
	Non-migrant	81	73.0	30	27.0
Location	Orkhon	19	67.9	9	32.1
	Ulaanbaatar	108	80.0	27	20.0
	Umnugobi	27	81.8	6	18.2
Employer type	Formal business	110	79.1	29	20.9
	Informal business	44	77.2	13	22.8
Work type	Permanent	72	85.7	12	14.3
	Temporary	82	73.2	30	26.8
Total		154	78.6	42	21.4

Source: Data from research on working conditions in Mongolia's construction sector, 2024

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