Exposing Neom

THE EUROPEAN CENTRE FOR DEMOCRACY AND HUMAN RIGHTS (ECDHR)

Executive summary

The Neom project, a \$500 billion mega-city currently being built on Saudi Arabia's Red Sea coast in the Tabuk province, stands as a centerpiece of Crown Prince Mohammed bin Salman's Vision 2030. This initiative seeks to diversify Saudi Arabia's economy and diminish its reliance on oil revenues, with authorities actively pursuing foreign investment and technical expertise to realize the development of Neom. Despite the idea being relatively recent, the Neom project has already proved to be controversial due to concerns related to sustainability, livability, and human rights. While it has managed to obtain help from the world's best and brightest engineers, architects, executives, and urban planners, thousands of those recruits have now withdrawn from the project, turned off by a management culture that belittles the workforce, makes unrealistic demands and turns a blind eye to discrimination.

While there are already numerous concerns about human rights in Saudi Arabia in general, with the Freedom House granting the country 7/100 in its global freedom scoring due to its many human rights violations, the controversies connected to Neom mainly relate to evictions and arbitary detention of individuals ahead of its construction. As the city is set to be built on the historic homeland of the Huwaitat tribe, Saudi authorities have illegally displaced persons belonging to this local tribe without adequate compensation or offering alternative housing, and violently cracked down on persons protesting against these evictions as seen in the case of Abdul-Rahim al-Howeiti.

With regard to future concerns, heavy criticism has been connected with Saudi authorities' unveiled blueprints for "The Line", a vertically layered city set to be embedded within Neom. Sustainability concerns have arisen regarding the carbon associated with building the project, which has been estimated to amount to 1.8 billion tonnes of carbon dioxide. Saudi authorities have also announced that 'The Line' will heavily use artificial intelligence and 'human-machine interface' technology which has sparked worries about potential digital surveillance of future inhabitants. Moreover, given Saudi Arabia's grim record on migrant worker rights, concerns about the treatment of migrants during the construction of the mega-city are escalating.

The ECDHR has analyzed the human rights violations related to Neom and presents its findings in this briefing paper. In addition, it identifies possible risks associated with the construction of the project in the future. Drawing from these insights, the paper proposes a range of policies and recommendations aimed at both the Saudi government and businesses involved in the investment of the project. These measures aim not only to address existing human rights violations but also to proactively mitigate future risks and prevent further infractions from occurring.

What is Neom?

In 2017, Saudi Arabia launched a proposal to build a new city called 'NEOM', meaning 'a new future' with a unique approach to urbanization with a 170-kilometer-long linear urban development line. The Neom project is at the forefront of Saudi Vision 2030, a strategic plan introduced by the Saudi Arabian government to <u>diversify</u> the economy away from oil, modernize various sectors, and improve social development. It focuses on economic diversification, privatization, social empowerment, and governance reforms with the aim of transforming Saudi Arabia into a more dynamic and sustainable economy by 2030. The Saudi Arabian government has <u>set up</u> a closed joint-stock company called Neom with USD 500 billion (project cost), using solely public funds. With its strategic location on the Red

Sea, more than 40% of the world's population would be able to reach the city within a four-hour flight journey.

Renewable energy sources would completely power the city, and the first phase of the project is <u>estimated</u> to be completed by 2025. However, the project is now <u>facing</u> significant delays and downsizing: originally planned to stretch 170 km, it's now projected to cover only two and a half kilometers by 2030. This setback contrasts sharply with its initial ambition to accommodate 9 million people on a compact 33-square-kilometre footprint. As part of the broader Neom project, the Line's downsizing has led to contractors dismissing workers, marking a significant departure from the grand vision initially proposed by Crown Prince Mohammed bin Salman.

Neom <u>encompasses</u> an area of around 26,500 square kilometers in northwestern Saudi Arabia. The area is bounded by the Red Sea to the south and the Gulf of Aqaba to the west, bordering Jordan to the North and Egypt across the Gulf of Aqaba. Its geographical positioning is strategically significant, as it bridges three continents: Asia, Africa, and Europe.



The city was <u>chosen</u> for its prime location, strategically positioned to enhance accessibility and connectivity to major global markets. Its adjacency to the Suez

Canal, a vital maritime artery, underscores its potential as a global nexus for trade, innovation, and cultural exchange. The project's goal is to capitalize on this strategic advantage, making international markets easily accessible, attracting tourists, and fostering international cooperation.

The Neom development projects include different "regions", mainly The Line, Oxagon, and Sindalah.

The Line

"The Line" is an urban development initiative with a budget of \$725 billion, <u>aiming</u> to accommodate 9 million residents. Its iconic feature is a colossal mirrored wall-like structure measuring 200 meters wide and 500 meters tall. Located in Saudi Arabia's north-western Tabuk province, the project spans 170 kilometers inland from the Red Sea, traversing diverse landscapes including coastal deserts, mountains, and upper valleys.



Positioned as a pioneer in sustainable development, The Line occupies a mere 34 square kilometers, equating to less than 4 square meters per person. This compact footprint contrasts sharply with NEOM's vast 26,500-square-kilometre expanse, promising a minimal impact on the surrounding environment. While hailed as a post-carbon eco-city, The Line's ambitious scale raises legitimate concerns regarding its ability to achieve its environmental, economic, and social objectives within a short timeframe.

Zero-emissions living

The Line aims for a carbon-neutral way of living. It integrates renewable energy sources such as solar and wind power to meet its energy needs, reducing reliance on fossil fuels and minimizing carbon emissions, in line with the Saudi Vision 2030. Advanced infrastructure and smart city technologies are integrated into The Line's design to enhance efficiency, connectivity, and sustainability, including smart grid systems, and efficient transportation networks, while incorporating ample green spaces to promote biodiversity and community well-being. Conservation efforts extend to preserving natural environments.

The reality of the construction of such an immense project is unlikely to be low-emission. Its intense consumption of concrete, steel, and water is the antithesis of the proposed sustainability which is at the core of Neom. <u>Critics</u> have accused the Saudi Prince, who is the driving force behind the whole project, of greenwashing-capitalizing on the growing demand for environmentally friendly practices, to distract from more pending issues.

Experts have estimated that the construction of The Line would produce more than 1.8 billion tonnes of embodied carbon dioxide, which will ultimately overwhelm any environmental benefit, without mentioning the impact of the mirrored façades on local fauna.

Furthermore, the estimated increase in the population of Saudi Arabia coming from this project will exert an acute demand for water resources in the desert region. This primary need will supposedly be <u>met</u> by desalination plants which would use renewable energies, however, to this day, sustainable desalination plants have yet to be successful.

The Oxagon

<u>The Oxagon</u> is a region in the southwest corner of Neom, designed to be one of the world's largest floating industrial complexes. It establishes the port and supply ecosystem for Neom as a whole, once again supposedly 100% "sustainable", and focusing on the use of Industry 4.0 (IoT- Internet of Things, cloud computing, and cybersecurity) to provide a productive business environment and attract the establishment of international shipping headquarters.



Sindalah

Described as "the future of luxury travel" by the Saudi Prince, <u>Sindalah</u> will be an 840 000 square meter island, a hub for the yachting community.



Saudi Arabia's Special Economic Zones

In 2023, Saudi Arabia <u>announced</u> four new special economic zones (SEZ) across the country, to incentivize international companies to operate in the Kingdom. <u>SEZs</u> are geographically delineated areas that support specific activities such as investment, trade, and employment by providing competitive advantages and legislative frameworks that differ from the base economy.

One of them is Neom, thus it benefits from:

- Tax exemptions
- Regulatory flexibility: including simplified business registration processes,
 relaxed labor regulations, and faster permit approvals
- Greater ownership rights
- Infrastructure support
- Innovation and research incentives

These economic incentives aim to attract domestic and foreign investors, by relaxing legal and fiscal requirements and standards, offering a real economic incentive to invest in this project. Although the financial cost may be lower, the human cost is greater: the relaxed labor regulations truly <u>facilitate</u> human rights abuses. Keeping in mind that Saudi Arabia already has poor laws on workers' rights under the Kafala system, the increased relaxation of labor policies in these special economic zones allows further room for human exploitation.

Despite the financial incentives, the project has been <u>struggling</u> to obtain sufficient investment funds, particularly after the murder of Saudi-US journalist Amal Khashoggi in 2018. The killing was approved by the crown prince, according to <u>US</u> <u>intelligence</u>.

Jamal Khashoggi's death brought widespread attention to concerns about Saudi Arabia's respect for freedom of expression and human rights. His killing raised serious questions about the country's commitment to upholding these values. It sparked international condemnation and scrutiny of Saudi Arabia's treatment of dissidents and journalists. The incident has had a significant impact on perceptions of Saudi Arabia's record on human rights and its commitment to fundamental freedoms. This event had repercussions on foreign direct investment for Neom, as the crown prince <u>reportedly said</u> "No one will invest for years".

Non-governmental organizations (NGOs) and human rights advocacy groups have already <u>criticized</u> Saudi Arabia for its extremely poor human rights record many times. The country has <u>violated</u> international human rights, from killings at its border with Yemen, arbitrary arrests of dissidents, and abuse of migrant workers. These actions contravene international human rights law, particularly regarding freedom of expression, association, and the rights of migrants. Despite announced reforms, concerns persist about accountability and the government's use of sports and entertainment to improve its image.

'Built on Saudi Blood': Evictions, detentions and prosecution of local inhabitants

Before the construction of Neom started, the Saudi authorities had laid down plans to take extensive measures to acquire the land on which they aimed to build the mega city. These measures included evictions, detentions, prosecutions, and even death of local inhabitants already living on the land.

Forced Evictions

For centuries, the AI-Howeitat tribe has inhabited the Tabuk province in northwestern Saudi Arabia. When the Neom project was announced in 2017 with plans to develop it on their ancestral land, it sparked various concerns among the tribe members. By that time, the Saudi Public Investment Fund (PIF) had already obtained ownership of the entire area, leading to the

suspension of land transfers and license renewals for locals.



The apprehensions soon turned into reality as the Saudi government declared that residents of the Howeitat tribe were to be forcibly displaced and relocated to facilitate the construction of Neom, starting from January 1, 2020. Local inhabitants voiced their opposition by submitting petitions to the Special Development committees, urging a halt to the evictions and proposing alternative solutions to prevent compulsory displacement. They suggested options such as establishing an alternative project nearby to compensate for their uprooting. Despite the local community's protests and proposed alternatives, the forced evictions commenced within a fortnight of the announcement. The Saudi authorities initiated a series of measures to displace members of the Howeitat tribe from their dwellings and ancestral lands in three pivotal villages - Al Khuariba, Sharma, and Gayal - to pave the way for the project's progression.

The eviction process started with the placement of street signs urging residents to identify their property on the land registry and surrender it. However, by March 2020, authorities escalated pressure and deployed Special Forces to conduct raids on the homes of dissenting locals, resulting in the illegal dispossession and forced eviction of 20,000 members of the Huwaitat tribe from their homes and even the death of one member, namely Abdul Rahim al-Howaiti. Despite promises from the Saudi government that residents would be involved in the process and receive fair compensation, this did not happen.

Case spotlight: Abdul Rahim al-Howaiti



As more and more people opposed the evictions, the raiding of homes by the Saudi authorities increased and became significantly more violent. On April 12, 2020, Abdul Rahim al-Huwaiti, a member of the Huwaitat tribe and a resident of the al-Khuraiba village in the northwest Red Sea region, defied orders to vacate his home for the mega-project. Al-Huwaiti, an active figure on social media, shared a video on YouTube expressing that those who resisted leaving their homes would face arrest by government agents. He characterized the government's actions as "forced displacement" and "state terrorism". In the same video, he voiced concerns that he would be the next target, alleging that the Saudi authorities would forcibly remove him from his residence and place weapons there to falsely incriminate him.

On April 13, 2020, dozens of special forces surrounded al-Huwaiti's house with heavy weapons and opened fire at his house without any prior provocation or warning. These events were captured by Al-Huwaiti, who recorded a video documenting security forces using excessive force and live ammunition to raid his property. Al-Huwaiti returned fire shortly after the special forces shot him dead.

"Anyone who refuses to leave the area would be arrested by government agents, this is forced displacement"

On April 16, 2020, the Saudi authorities released a statement confirming the death of Al-Huwaiti, asserting that he had barricaded himself in his home and that his actions necessitated intervention "to neutralize his threat". The government claimed his death was the result of him opening fire on the special forces first and emphasized that 'the State Security Presidency warned that it would deal firmly with those who attempted to "disrupt security in any way". The authorities kept Al-Huwaiti's body for a week after his death but agreed to hand it over to his family for burial after increased pressure in the media. However, the authorities did not return the body in time for the family to perform their burial rites in the time prescribed in Islamic tradition.

The incident involving Al-Huwaiti highlights the utilization of excessive and disproportionate force by law enforcement authorities in advancing the Neom construction. It underscores a stark preference for economic development in Saudi Arabia at the expense of fundamental human rights. Beyond just forced displacements, Al-Huwaiti's case illustrates the lengths to which Saudi authorities are willing to go, even resorting to fatal measures, to realize this project.

Arbitrary Arrests and Prosecutions

Not only have local inhabitants been displaced from their homes, but many Huwaitis who publicly opposed the evictions in a peaceful manner were arrested by security forces and are facing long prison sentences. In particular, the Saudi authorities arrested and sentenced Huwaitat tribe members based on 'anti-terrorist' laws, more

specifically the country's draconian Counter-Terrorism law, labeling them as a threat to national security.

Following years of arbitrary detention, many tribe members received lengthy prison sentences, ranging from 5 to 50 years for what were labeled as "terrorist crimes," simply due to their peaceful protests against being forcibly removed from their own residences. One such example is <u>Mahmoud al-Huwaiti</u>, who was arrested on November 24, 2020, while peacefully opposing the Neom project on his family's farm in the al-Kuraiba region. He was subject to six months of solitary confinement, enduring severe psychological and physical torture, before being sentenced to 35 years in prison on terrorism-related charges stemming from his exercise of free speech.

In addition, the Specialised Criminal Court of Appeal handed down a 50-year prison sentence to both Abduliah Rashid Ibrahim al-Huwaiti and Abdullah Dakhil Allah al-Huwaiti for supporting their family's resistance against forced eviction, clearing the path for the construction of Neom. Abdullah Dakhil faced charges alleging involvement in terrorist activities through social media platforms like Twitter, Signal, and Telegram, which were framed as aiming to destabilize societal and state security. The charges also included supporting individuals with extremist ideologies and possessing unauthorized firearms purportedly intended for terrorist operations.

Abdullah Dakhil maintained that his opposition was not directed at the Neom project itself but rather against the displacement of his family to a distant location instead of providing nearby alternatives. He asserted that the eviction would render his family homeless, prompting him to share their plight on social media. Despite his defense, the Court of Appeal sentenced him to 50 years in prison, coupled with a corresponding travel ban of 50 years, for his actions. Abdelnasser Ahmad Mahmoud Abou Taqiqa al-Huwaiti was also sentenced to 27 years for his vocal opposition to the NEOM project. He was placed in solitary confinement, tortured for months, and coerced into a confession.



Mahmoud Ahmad Mahmoud Abou Taqiqa al-Huwaiti, Sentenced to 35 years



Abdullah Dakhil Allah al-Huwaiti, Sentenced to 50 years



Abdelnasser Ahmad Mahmoud Abou Taqiqa al-Huwaiti, Sentenced to 27 years

Case spotlight: Death sentences for three tribe members

In addition to the arbitrary arrests and unfounded long prison sentences, the Saudi authorities handed down death sentences on three members of the Howeitat tribe. On 5 August 2022, Shadli Ahmad Mahmoud Abou Taqiqa al-Huwaiti, Ibrhahim Salih Ahmad Abou Khalol al-Huwaiti and Atallah Moussa Mohammed al-Huwaiti were reportedly sentenced to death and on 23 January 2023 their sentences were upheld by the Specialized Criminal Court of Appeal. The three individuals faced charges under the broad and frequently invoked Saudi Counter-Terrorism law. However, these charges were essentially levied to retaliate against them for their nonviolent resistance to forced evictions and displacement of residents in favor of the Neom project.

While countries that have not yet abolished the death penalty are typically restricted by international law to imposing it solely for the most severe offences, the Saudi authorities, in this instance, have applied the death penalty to individuals who resisted forced evictions from their homes to accommodate the Neom project—a punishment that is disproportionate to the nature of the offence.

These sentences handed down to members of the Huwaitat tribe are indicative of a broader trend that emerged in the summer of 2022, where individuals received lengthy prison terms simply for expressing their views on social platforms, advocating for social and political reforms. Additionally, the Saudi authorities have increasingly resorted to imposing death penalties, culminating in the execution of

196 individuals in 2022 for a range of offences, including the exercise of their freedom of speech.



Future risks: workforce, surveillance and environmental concerns

With human rights abuses already occurring prior to the commencement of the Neom project, apprehensions have been raised regarding both the project's construction and its eventual establishment. The project necessitates a substantial workforce, making fair and ethical treatment imperative. Given past instances of labor violations, particularly among migrant workers involved in other Saudi Arabian projects, worries have surfaced regarding the welfare of migrant workers. Moreover, while the Neom project aims to establish a sustainable city focused on renewable energy and sustainable development, its construction presents numerous environmental and sustainability challenges. These include potential ecological health hazards, particularly concerning air, water, and soil pollution. Additionally, there are growing concerns regarding privacy rights due to the potential for mass state surveillance in the mega city of Neom.

Workforce

The initial stages of Neom's construction have been carried out, likely by Saudi Arabia's migrant labour force. 'The Line', a component of this initial phase, is gradually materialising, aiming for completion by 2030. The Saudi government has not provided clarity on the composition of the project's workforce, but it's probable that a significant portion comprises migrant workers, raising concerns about potential violations of migrant rights, a recurring issue in the country.

Despite Saudi Arabia's announcement of labour reforms in 2021, the implementation has fallen short, and the country continues to largely operate under the stringent Kafala system. Under this sponsorship system, workers are reliant on their employers for residency, entry into the country, and employment, exposing them to significant risks. These include the potential confiscation of passports by employers, delays or non-payment of wages, and often spending initial years in employment settling recruiter fees before earning a substantial income. More importantly, previous construction projects in Saudi Arabia have seen migrant workers subjected to harsh and inhumane working conditions, enduring long hours and extreme temperatures.

These past violations linked to the construction of other projects raises <u>imminent</u> <u>concerns</u> about the migrant workforce in the current construction of Neom. In fact, Neom's migrant workers may be even more vulnerable than their counterparts in the rest of Saudi. As the city is the 'crown jewel' of Prince Mohammed bin Salman Vision of 2030, he will likely not respond well if his project runs behind schedule. Given the already demonstrated violent approach in evictions to make way for Neom's development, the risks for migrant rights connected to the project become increasingly more actual.

Environment

The development of Neom necessitates substantial resources and energy, potentially resulting in heightened emissions and environmental degradation. A primary concern revolves around the construction of 'The Line', posing threats to local wildlife, ecosystems, and local water resources. This expansive project encroaches upon an area with diverse plant and animal life, including endangered species, thereby risking their habitats and survival. Moreover, situated in a desert

landscape, the Line's demand for water to sustain the city and its inhabitants could strain local water resources, diminishing availability for vital purposes like agriculture and conservation.

While the Line has been promoted as a zero-carbon emission project by eliminating carbon-intensive infrastructure such as cars and roads, experts are sceptical of the embodied carbon impact of building the line and all the associated infrastructure. The height of the Line requires strength to withstand wind, which means it would need a massive amount of steel, glass and concrete which has been estimated to produce upwards of 1.8 billion tons of embodied carbon dioxide, equivalent to more than four years of the UK's entire emissions. These concerns have resulted in accusations of 'greenwashing' pointed at the Prince, as he makes elaborate proposals and promotions of a 'sustainable' or 'eco city' to distract from the reality of its environmental impact.

Surveillance and privacy

Neom, akin to its counterparts, is promoted as a 'smart' or 'eco city,' yet it is said that it will fundamentally operate as a surveillance hub. It thrives on an architecture driven by individuals' personal data. In Saudi Arabia, the absence of data protection, oversight, accountability, transparency, or separation of powers allows Mohammed bin Salman to directly oversee security agencies.

In addition, while there is still not the same degree of physical surveillance in Saudi Arabia as there is in China, China is working with the Saudis to start implementing surveillance technology as Xi Xiping and Prince Mohammed bin Slaman share a conviction that technology can enable them to expand their economies while relinquishing none of their authoritarian control. This means that China is actively selling surveillance equipment to Saudi Arabia which will most likely also be used in Neom.

Consequently, there are increasing concerns that with the help of Chinese technology, the construction of Neom could facilitate state-controlled cyberspace and monitor the public under the guise of a 'smart city'.

The responsibility of businesses: The priority of investment, not human rights

The Neom project has garnered significant attention from major investors globally. Driven by substantial incentives and subsidies provided by the Saudi authorities, numerous companies are entering into contracts across various sectors within Neom. Despite human rights organizations highlighting the complicity of these investments in human rights violations, companies often respond with generic statements. Some even justify their involvement in the Neom project by claiming that "it allows them to make a positive impact and meaningful contributions".

For instance, in 2023, the company of DSV announced a 10 billion dollar logistics joint venture to support the development of Neom in the coming years. The agreement comes shortly after forced evictions and arbitrary detentions have taken place, demonstrating the clear prioritisation of companies in money over human rights. While the company has stated they are aware of the human rights concerns taking place in the development of this project, clarifying they are 'very concerned about this cooperation', the agreement is still being upheld.

DSV is just one example of many companies adopting a two-faced stance: acknowledging human rights violations while continuing to invest in such projects. However, all these companies are bound by both legal and moral obligations to refrain from participating in or benefiting from human rights abuses. These responsibilities are outlined in the UN's Guiding Principles on Business and Human Rights (UNGPs), which offer precise directives for identifying and evaluating whether human rights have been upheld through due diligence procedures. Moreover, the UNGPs unequivocally require businesses to address any negative human rights consequences associated with their operations, regardless of whether states are the primary duty-bearers.



Conclusion

The Neom project heralded as a beacon of sustainability and prosperity by the Saudi Arabian government, has become the object of human rights abuses and potential future violations. The forced evictions, detentions, and prosecutions of the Huwaitat tribe members from their ancestral lands represent stark violations of their fundamental rights, accompanied by a disturbing pattern of violence and intimidation. The tragic case of Abdul Rahim al-Howeiti, who lost his life defending his home against forced eviction, serves as a reminder of the lengths to which authorities are willing to go to realise the Neom project.

Moreover, the arbitrary arrests, draconian prison sentences, and even death sentencesimposed on individuals peacefully opposing the project underscore the Saudi government's blatant disregard for basic freedoms of expression and dissent. The use of anti-terrorism laws to suppress legitimate opposition and silence dissenting voices is a clear abuse of power, indicative of a broader pattern of repression and authoritarianism.

Looking ahead, the Neom project poses significant risks of further human rights abuses, particularly concerning the treatment of the vast migrant workforce essential for its construction. Past experiences with migrant labour in Saudi Arabia, coupled with the lack of meaningful labour reforms, raise serious concerns about the potential for exploitation, abuse, and deplorable working conditions.

Furthermore, the environmental sustainability of the project remains in question, with experts warning of the significant carbon footprint and ecological damage associated with its construction. The ambitious scale and rapid pace of development raise legitimate concerns about the project's long-term impact on the environment, including air and water pollution, habitat destruction, and strain on vital natural resources.

In light of these grave concerns, it is imperative that all stakeholders take immediate and decisive action to mitigate the human rights abuses and environmental risks associated with the Neom project. The Saudi government must uphold its international obligations and respect the rights of all individuals affected by the project, including the Huwaitat tribe members and migrant workers. Business entities involved in the project must conduct thorough human rights due diligence and be prepared to cease their partnership if abuses persist.

Additionally, the international community has a responsibility to hold the Saudi government and businesses accountable for their actions and exert pressure to ensure compliance with international human rights standards. Multilateral institutions, civil society organisations, and concerned individuals must continue to advocate for justice, accountability, and respect for human rights in the context of the Neom project.

Ultimately, the success of the Neom project should not come at the expense of human dignity, rights, and environmental integrity. It is incumbent upon all stakeholders to prioritise the protection of human rights, promote transparency and accountability, and ensure sustainable development for the benefit of present and future generations.

Recommendations

The ECDHR calls on the Saudi government to:

- Ratify and uphold the International Covenant on Economic, Social and Political Rights
- Address imminent needs of evicted residents from the Huwaiti Tribe

- Release arrested members of the Huwaitat tribe and drop terrorism charges associated with them
- Release death row detainees charged for exercising their freedom of expression
- Assess the impact of the construction of Neom on the environment and implement measures to ensure the least possible harm to the climate

The ECDHR calls on businesses investing in Neom to:

- Re-evaluate their involvement in the Neom project and be prepared to cease their partnership if human rights concerns are not addressed
- Uphold their legal and moral responsibilities under the UNGPs on Business and Human rights
- Guarantee that the services and materials offered to the Saudi authorities on the Neom project are not used to infringe international human rights law