



Murray & Roberts Pty Ltd - Modern Slavery Statement FY2021

1 Introduction

This Modern Slavery Statement (**Statement**) is made by Murray & Roberts Pty Ltd (ACN 105 617 865) (**Murray & Roberts**) for the reporting period 1 July 2020 to 30 June 2021. This Statement is published as part of Murray & Roberts' obligations under the *Modern Slavery Act (Cth) 2018 (Act)*. It references the activities undertaken throughout the reporting period by Murray & Roberts' operating subsidiaries to strengthen modern slavery mitigation processes and better understand risks within the operations and supply chains of these businesses.

Where this Statement refers to the Murray & Roberts Group, it is a reference to Murray & Roberts Holdings Limited¹ and its subsidiaries, some of which are not reporting entities pursuant to the Act.

2 Murray & Roberts' structure, operations, and supply chains

2.1 Corporate Structure

Murray & Roberts is incorporated and domiciled in Australia and is a wholly owned subsidiary of Murray & Roberts Limited². Murray & Roberts is a non-operating holding company - it holds and manages subsidiaries which provide engineering and construction services.

Murray & Roberts is the holding company for Clough Limited (ACN 008 678 813) (**Clough**) and RUC Cementation Mining Contractors Pty Ltd (ACN 051 252 549) (**RUC**) (together **Operating Businesses**). These Operating Businesses are both reporting entities under the Act and have separately filed modern slavery statements. Clough's Modern Slavery Statement (**Clough Statement**) and RUC's Modern Slavery Statement (**RUC Statement**) are **attached** to this Statement³ and should be read in conjunction with it.

The Murray & Roberts Group is a multinational engineering and construction company, which delivers its capabilities into three global primary market sectors:

- energy, resources and infrastructure;
- mining; and
- power, industrial and water.

The Murray & Roberts Group's vision is to be a leading multinational engineering and construction group that applies its project life cycle capabilities to optimise clients' fixed capital investment by focusing its expertise and capacity on delivering sustainable project engineering, procurement, construction, commissioning, operations, and maintenance solutions.

¹ Incorporated in South Africa, Registration No. 1948/029826/06

² Incorporated in South Africa, Registration No. 1979/003324/06

³ See Annexure 1

2.2 Operations

As set out above, Murray & Roberts is a non-operating holding company. Projects, and other operational activities, are undertaken by its Operating Businesses. The Clough Statement and RUC Statement provide details of the projects undertaken by the Operating Businesses. Please refer to section 2.2 of the Clough Statement and section 3.1 of the RUC Statement.

2.3 Supply chains

The Operating Businesses have global supply networks, particularly to service their highly specialised local and international projects. For further details about these supply chains, please refer to section 2.3 of the Clough Statement and section 3.1 of the RUC Statement.

3 Risks of modern slavery practices in operations and supply chains

Murray & Roberts has assessed the risk of modern slavery practices within Murray & Roberts to be low, as it is a non-operating company. In terms of its Operating Businesses, Clough and RUC have both assessed such risks within their operations and supply chains. Please refer to section 3 of the Clough Statement and section 4 of the RUC Statement for further details.

4 Actions to assess and address the risks

During the reporting period, the Operating Businesses had various measures in place to mitigate modern slavery risks in the Operating Businesses' operations and supply chains. In addition to this, various measures were implemented during the reporting period to further strengthen current processes. For further details of these measures, please refer to section 4 of the Clough Statement and section 5 of the RUC Statement.

Murray & Roberts supports the steps that its Operating Businesses have taken, or propose to take, to strengthen modern slavery mitigation processes and protect fundamental human rights.

5 Assessing effectiveness of actions

The Operating Businesses have assessed the effectiveness of the measures which were in place, or implemented, during the reporting period. For details of these assessments, please refer to section 5 of the Clough Statement and section 6 of the RUC Statement.

6 The process of consultation

This Statement was prepared in consultation with the Operating Businesses.

7 Approval

This Statement was approved by the Murray & Roberts Board on 21 December 2021.

The background of the page is a photograph of two workers in orange high-visibility clothing and hard hats standing on a metal staircase at an industrial site. The image is overlaid with a semi-transparent teal gradient. At the top, there is a decorative horizontal band with a pattern of diagonal lines in shades of green and teal.

CLOUGH MODERN SLAVERY STATEMENT

FY2021

Contents

1	Introduction	2
2	Clough Reporting Entities' structure, operations and supply chains	4
2.1	Corporate Structure	4
2.2	Operations	4
2.3	Supply chains	5
3	Risks of modern slavery practices	6
3.1	In Clough Reporting Entities' operations	6
3.2	In Clough Reporting Entities' supply chains	6
4	Actions to assess and address the risks	7
4.1	Clough Reporting Entities' standards and policies	7
4.2	Modern slavery awareness training	7
4.3	Strengthening supply chain transparency and accountability	7

1 Introduction

This joint modern slavery statement (Statement) is made by Clough Limited (ABN 59 008 678 813) (**Clough Limited**), Clough Projects International Pty Ltd (ABN 84 109 444 902) (**Clough Projects International**), Clough Operations Pty Ltd (ABN 26 109 444 279) (**Clough Operations**), Clough Projects Pty Ltd (ABN 67 109 444 831) (**Clough Projects**) and Clough Projects Australia Pty Ltd (ABN 26 109 444 215) (**Clough Projects Australia**) (together **Clough Reporting Entities**) for the reporting period of 1 July 2020 to 30 June 2021 under the *Modern Slavery Act (Cth)* 2018 (Act).

The Statement describes:

- the structure, operations and supply chain of the Clough Reporting Entities;
- risks of modern slavery practices in such operations and supply chains;
- activities and procedures undertaken throughout the reporting period by Clough to prevent modern slavery; and
- how Clough assesses the effectiveness of its activities and procedures.

Where this Statement refers to Clough, it is a reference to Clough Limited and its subsidiaries, some of which are not reporting entities pursuant to the Act.



2 Clough Reporting Entities' structure, operations and supply chains

2.1 CORPORATE STRUCTURE

Clough Limited is a wholly owned subsidiary of Murray & Roberts Pty Ltd (ACN 105 617 865), incorporated and domiciled in Australia. Clough Limited is the holding company for Clough International, Clough Operations, Clough Projects and Clough Projects Australia.

Clough is a pioneering engineering and construction company established in 1919 in Perth, Western Australia. Clough operates in global markets, delivering sustainable, high performing assets for the infrastructure, resources and energy industries. Clough manages a workforce of over 2,000 people from operating centres across Australia, Papua New Guinea, Asia, North America and the United Kingdom.

2.2 OPERATIONS

Clough has construction and infrastructure projects in Australia, Papua New Guinea, North America, Mongolia and the United Kingdom.

Clough's projects and principal office locations are set out in the map below.

Some of Clough's construction and infrastructure projects are undertaken in joint venture with entities not owned or controlled by Clough, and Clough Reporting Entities are party to several unincorporated joint ventures.

Clough's Projects and Office Locations

	CLOUGH'S PROJECTS
	CLOUGH'S OFFICE LOCATIONS

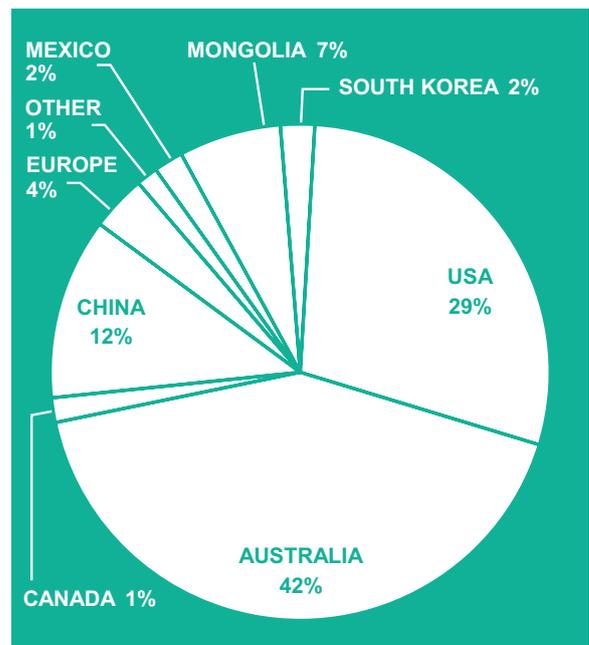




2.3 SUPPLY CHAINS

Clough Reporting Entities have a global supply network, particularly to service its highly specialised projects and international projects.

The majority of Clough’s materials and equipment is procured in Australia and the USA, with Clough spending approximately 70 percent of its total supplier spend on Australian and US suppliers¹. The top countries, based on supplier spend, from which Clough procured materials and equipment are set out below, together with the percentage spend per country².



Clough’s top spend categories for materials and equipment are:



Rotating Mechanical Equipment



Pressure Vessels



Electrical Equipment



Structural Steels

¹ This data is based on Clough’s spend on materials and equipment between 2016 and 2021.

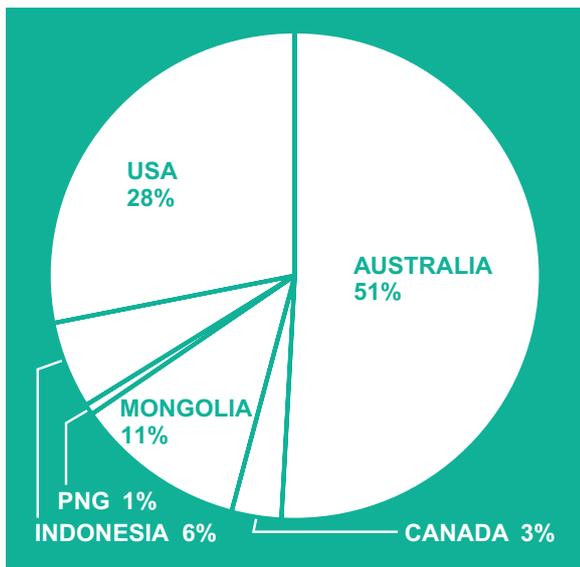
² This data is based on Clough’s spend on materials and equipment between 2016 and 2021.

3 Risks of modern slavery practices

3.1 IN CLOUGH REPORTING ENTITIES' OPERATIONS

Clough Reporting Entities have assessed the risk of modern slavery in its direct operations as low, particularly as its employees are predominately located in Australia and the USA. Clough Reporting Entities have policies and procedures in place that promote the protection of human rights, in addition to ethical business conduct. The below chart shows the countries where Clough employees are based³.

Clough Reporting Entities have stringent and transparent recruiting processes, and applicants are provided with detailed information about prospective roles and working conditions. Clough Reporting Entities also undertake regular reviews of employees' remuneration and working conditions to ensure compliance with all applicable laws. As set out below, Clough also has employees based in Mongolia. These employees work for a project site where wages are high comparatively for the region. Clough's Human Resources and Legal Departments ensure that all labour laws are followed.



From time to time, Clough Reporting Entities engage agencies to supply labour to its operations. When doing this, Clough Reporting Entities engage reputable agencies and require these agencies to comply with all applicable laws, in addition to requiring agencies to disclose the remuneration the worker will receive.

3.2 IN CLOUGH REPORTING ENTITIES' SUPPLY CHAINS

Clough Reporting Entities operate in the construction and infrastructure sector, a sector with elevated modern slavery risks in terms of its supply chain. In addition to this, the construction supply chains comprises of millions of raw materials and components used to construct complex infrastructure, some of which also have elevated risks of modern slavery.

Since the last reporting period, Clough Reporting Entities applied measures to mitigate modern slavery risks in its supply chains and operations, including those set out at paragraph 4 of this Statement. Clough Reporting Entities are continuing to assess supply chain risks and improve transparency across its direct and extended supply chains.

³ Based on data as at June 2021.

4 Actions to assess and address the risks

Below are some of the key measures Clough Reporting Entities have in place to mitigate modern slavery risks in its supply chains and operations. Clough Reporting Entities are also striving to implement these measures for projects undertaken in an unincorporated joint venture with entities not owned or controlled by Clough.

4.1 CLOUGH REPORTING ENTITIES' STANDARDS AND POLICIES

Clough Reporting Entities have standards and policies that require its workforce to act ethically and with integrity, in addition to observing fundamental human rights. These standards and policies include (but are not limited to) the:

- a. Workplace Fair Treatment Standard;
- b. Code of Conduct; and
- c. Equal Opportunities and Dignity at Work Policy.

Clough Reporting Entities also encourage the disclosure of any instances of suspected unethical, illegal or undesirable conduct involving its business activities, including human rights violations. There are various avenues available for raising such concerns and concerns may be raised anonymously, as set out in Clough's Whistleblower Policy.

4.2 MODERN SLAVERY AWARENESS TRAINING

Clough Reporting Entities have implemented various measures to build awareness of human rights, including by providing tailored training to individuals and functions most likely to identify human rights related issues. This training has focused on the conduct that constitutes modern slavery under the Act and the geographical regions, materials and goods with elevated modern slavery risks, in addition to providing details of how actual or suspected violations can be raised.

4.3 DUE DILIGENCE PROCESS FOR NEW INTERNATIONAL JURISDICTIONS

Clough Reporting Entities continued to strengthen its due diligence process for entering new international jurisdictions to pursue projects or other business opportunities. As part of this process, modern slavery risks are specifically considered and addressed.

4.4 STRENGTHENING SUPPLY CHAIN TRANSPARENCY AND ACCOUNTABILITY

Clough Reporting Entities have identified various measures to continually improve transparency and accountability in its supply chains. During the reporting period, Clough Reporting Entities:

- a. Conducted a risk assessment of its direct, global materials and equipment supply chains.
- b. Required all domestic and international suppliers and subcontractors to comply with domestic and international modern slavery laws and standards by way of express terms and conditions.
- c. Required all domestic and international suppliers and subcontractors to provide information during the pre-qualification process confirming they have ethical business practices and comply with human rights standards, including refining questions to better capture information. This pre-qualification process specifically requires suppliers and subcontractors to disclose any modern slavery investigations or convictions, in addition to details of how any domestic and international modern slavery laws and standards are complied with.
- d. If suppliers do not adequately answer pre-qualification questions about mitigating risk around modern slavery, then following escalation, they will be excluded from tendering or doing work for Clough Reporting Entities. One potential supplier in the reporting period refused to adequately answer questions regarding preventing modern slavery and was excluded from qualification.

4.5 ASSESSMENT OF JV PARTNERS PRE-QUALIFICATION PROCEDURES FOR SUPPLIERS

Clough also has, where appropriate, taken the opportunity to investigate the pre-qualification processes and terms and conditions of its Joint Venture Partners to ensure they also interrogate suppliers about their commitment to eradicating modern slavery. This has resulted in Joint Venture Partners updating their pre-qualification procedures so that suppliers demonstrate a commitment to prohibiting modern slavery practices.

5 Assessing effectiveness of actions

During this reporting period, Clough Reporting Entities continued to focus and improve their understanding of modern slavery risks predominately within its supply chain. As set out above, Clough Reporting Entities analysed risks and used its processes to reduce modern slavery risks in its operations and supply chain. These measures have enabled Clough Reporting Entities to identify suppliers and subcontractors that present an increased risk of modern slavery.

It has also meant Joint Venture Partners show the same commitment to reducing risks around modern slavery in their supply chain.

Clough Reporting Entities continue to progressively enhance its detection process, escalation procedure and other mitigation capabilities, in addition to developing more effective tools to measure the effectiveness of Clough Reporting Entities' mitigation measures.



6 The process of consultation

This Statement was prepared in consultation with each of the Clough Reporting Entities and reflects the position of each of these entities. As part of the consultation process, operational projects were consulted, in addition to Clough's Supply Chain, Commercial, Human Resources and Legal Teams.

7 Approval

This Statement was approved by the Clough Limited Board on 9 November 2021.

Peter Bennett
Chief Executive Officer and Managing Director

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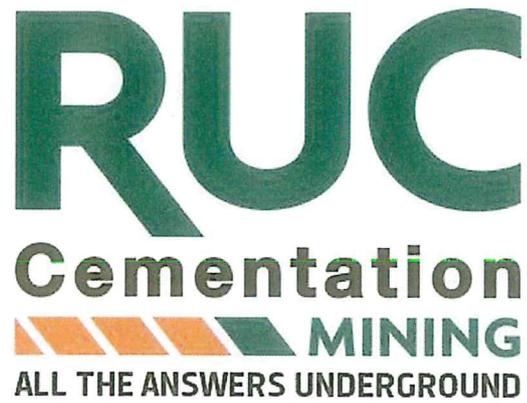


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FY21 MODERN SLAVERY STATEMENT



ALL THE ANSWERS UNDERGROUND

Table of Contents

1	INTRODUCTION.....	4
2	OVERVIEW	4
3	STRUCTURE, OPERATIONS AND SUPPLY CHAIN	4
4	RISKS OF MODERN SLAVERY	5
5	ACTIONS TO ADDRESS RISKS OF MODERN SLAVERY	5
6	ASSESSING EFFECTIVENESS OF ACTIONS	6
7	CONSULTATION PROCESS	6

1 INTRODUCTION

RUC Cementation Mining Contractors Pty Ltd ABN: 99 051 252 549 (“RUC”) is an Australian mining services contractor registered at 1/138 Abernethy Road Belmont WA 6104, Australia and is a wholly owned subsidiary of the Murray and Roberts Group comprising:

- RUC Cementation Mining Contractors Pty Ltd
- RUC HK
- Incycle Shotcrete Pty Ltd,
- PT RUC Cementation Indonesia, and
- RUC CEM LLC Mongolia (30% of GCR Mongolia and 50% Turan Mining which forms part of the Kazakhstan JV)

This statement has been developed to align RUC’s operational and supply chain practices in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) and RUC’s Business Code of Practice Policy.

This statement is applicable to RUC Cementation Mining Contractors Pty Ltd and its entities (referred to collectively as **RUC**) and will outline RUC’s commitment to identify, respond, and mitigate modern slavery risks in its business operations and supply chain function.

This statement is for the year ended 30 June 2021. References in this statement to ‘year’ or ‘period’ refer to the financial year ended 30 June 2021, unless otherwise stated by RUC.

2 OVERVIEW

Modern Slavery is present in both developing and developed global economies with an estimated 40.3 million global victims of slavery including some 24.9 million in construction, manufacturing, mining, domestic work, utilities and other industries.

RUC as a business and member of the resources industry recognises the right of all people involved in RUC’s supply chain, business operations and wider community to be free of slavery, entrapment, human trafficking, servitude, and other practices that modern slavery encompasses.

This statement will serve as a precursor to what will be the RUC modern slavery framework outlining the processes and tools that are currently in place and continue to be developed via its supply chain function to identify, detect and respond to incidents of modern slavery and human rights abuses.

Through this process led by RUC’s parent company Murray and Roberts, RUC has identified the need to further strengthen its supply chain thus, RUC will continue to develop its method of engagement, pre-qualification, tender / quotation processes, operational and project execution.

3 STRUCTURE, OPERATIONS AND SUPPLY CHAIN

RUC is an Australian mining services contractor delivering shaft sinking, raise drilling, mechanised mining, boxhole boring, ground support, and construction works including a key services center out of Kalgoorlie Western Australia.

3.1 STRUCTURE AND OPERATIONS

RUC's structure and operations comprise:

- RUC Cementation Mining Contractors Pty Ltd
- RUC HK
- Incycle Shotcrete Pty Ltd,
- PT RUC Cementation Indonesia, and
- RUC CEM LLC Mongolia (which covers 30% of GCR Mongolia and 50% of Turan Mining which is RUC's Kazakhstan JV).

As at December 2021 RUC employs 1,498 people – 379 in Australia, 3 (nationals) 1 (expat) in Hong Kong, and 1,115 in Indonesia 52 (expat) 451 (nationals). RUC also engages 536 people in Mongolia/ Kazakhstan however, this labour is engaged through RUC's JV partner (30% and 50% share respectively) therefore these numbers are not reported as those directly and 100% engaged by RUC.

RUC's supply chain currently engages with 798 suppliers and 40 subcontractors across all facets of its business operations.

4 RISKS OF MODERN SLAVERY

RUC Australian operations engage directly via permanent staff, fixed term contract, and enterprise bargaining agreements. This form of engagement in Australia presents a low risk of modern slavery practice. RUC is conscious however that supplier and subcontractor engagement in high-risk geographical locations presents a higher risk and therefore continues to develop its supply chain process to mitigate this factor.

RUC operations in Mongolia labour is engaged on fixed term contracts with GCR Mongolia. National labour is sourced by RUC JV partner GIP. All employment contracts comply 100% with local legislation.

RUC operations in Indonesia labour both expatriate and national are engaged on fixed term contracts. All contracts comply with local legislation and RUC exceed the minimum wage rates by a multiple of at least two.

5 ACTIONS TO ADDRESS RISKS OF MODERN SLAVERY

RUC's Business Code of Practice Policy provides for (among other items) fraud, corruption, anti-competitive behavior, unfair business, society and the environment, labour and human rights specifically RUC's commitment to the Modern Slavery Act (Cth). RUC is currently driving supply chain improvement via:

1. Review and update existing RUC policies and procedures to address modern slavery.
2. Develop RUC modern slavery framework including pre-qualification and preferred supplier due diligence via direct engagement with preferred suppliers and subcontractors.
3. Review and assess current RUC supplier list, their area of operations, method of engagement with local or international work force (at risk demographics, refugees or the like).
4. Undertake supply chain charting and identification of potential high-risk suppliers by supplier origin (**Reference to the Global Slavery Index**), screening and qualification.
5. Roll-out RUC wide Request for Quotation and Invitation to Tender inclusive RUC's modern slavery policy and framework.
6. Roll-out RUC wide supplier agreements and subcontracts inclusive of modern slavery clause wording and definition.

7. Develop RUC supply chain continuous improvement roadmap.
8. (reference to the **Global Slavery Index**) Operational activities that may cause or contribute to modern slavery practices due to their use of labour providers and subcontractors in high risk locations and industries.

6 ASSESSING EFFECTIVENESS OF ACTIONS

RUC's current review is to action, improve and streamline its supply chain function inclusive of procurement process and subcontract terms and conditions requiring subcontractors and suppliers to comply with the relevant legislative obligations including those relevant to eliminating modern slavery.

7 CONSULTATION PROCESS

RUC will continue to develop its internal supply chain process and method of engagement. In parallel RUC will continue to review and consult with its partners, entities and clients on the operational side of the business.

Approved by the Board of RUC Cementation

A handwritten signature in black ink, appearing to read 'Barry Upton'.

Barry Upton

Managing Director

10 December 2021