



## Murray & Roberts' Modern Slavery Statement FY2020

### 1 Introduction

This modern slavery statement (**Statement**) is made by Murray & Roberts Pty Ltd (ACN 33 105 617 865) (**Murray & Roberts**) for the reporting period of 1 July 2019 to 30 June 2020. 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 first 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 Limited<sup>1</sup> 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 Limited<sup>2</sup>. Murray & Roberts is a non-operating holding company, it holds and manages subsidiaries which provide engineering, construction and mining services.

Murray & Roberts is the holding company for Clough Limited (ACN 59 008 678 813) (**Clough**) and RUC Cementation Mining Contractors Pty Ltd (ACN 051 252 549) (**RUC**) (together **Operating Businesses**). The 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 Statement<sup>3</sup> 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.

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

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

<sup>3</sup> 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 energy, resources and infrastructure as well as mining 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 projects 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 first 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 31 March 2021.



**PETER BENNETT  
DIRECTOR**

The background of the page is a photograph of an industrial facility, possibly a refinery or chemical plant. Three workers in orange and blue high-visibility work clothes and white hard hats are standing on a platform, looking towards the right. The scene is overlaid with a semi-transparent green filter. At the top of the page, there is a decorative pattern of thin, parallel green lines.

# CLOUGH MODERN SLAVERY STATEMENT

**FY2020**

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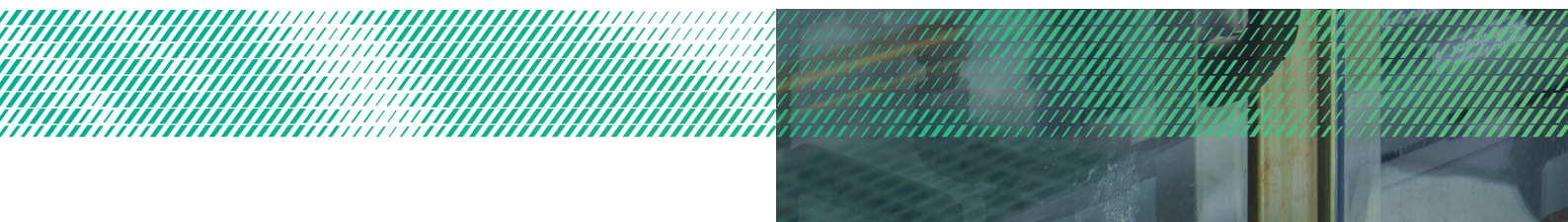
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## 1 Introduction

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 2019 to 30 June 2020. This Statement is published as part of Clough Reporting Entities' obligations under

the *Modern Slavery Act (Cth) 2018* (Act). It describes the activities undertaken throughout the first reporting period to strengthen Clough Reporting Entities' processes and better understand the risks of modern slavery in Clough's supply chains and operations.

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 Projects 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.

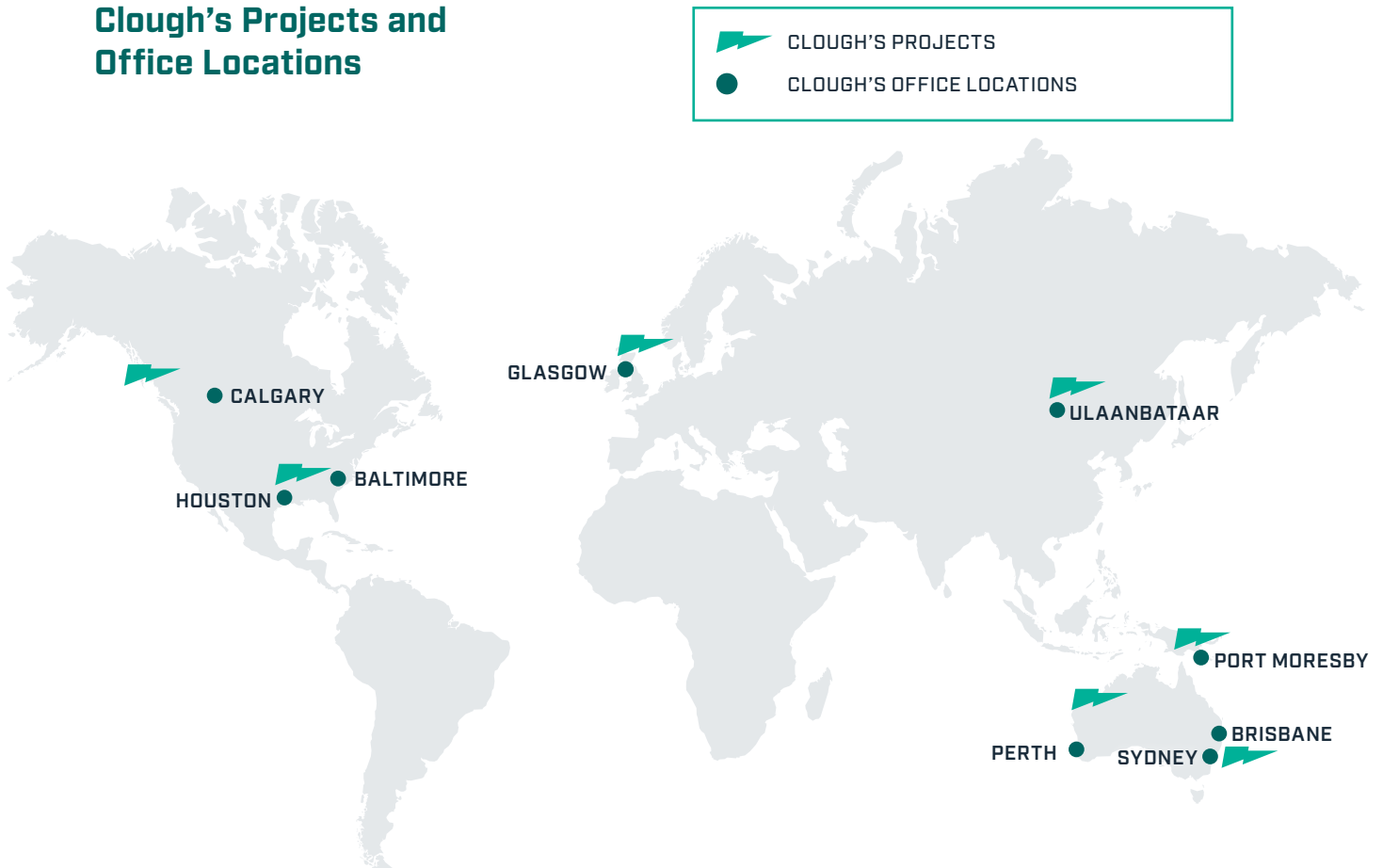
### 2.2 OPERATIONS

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



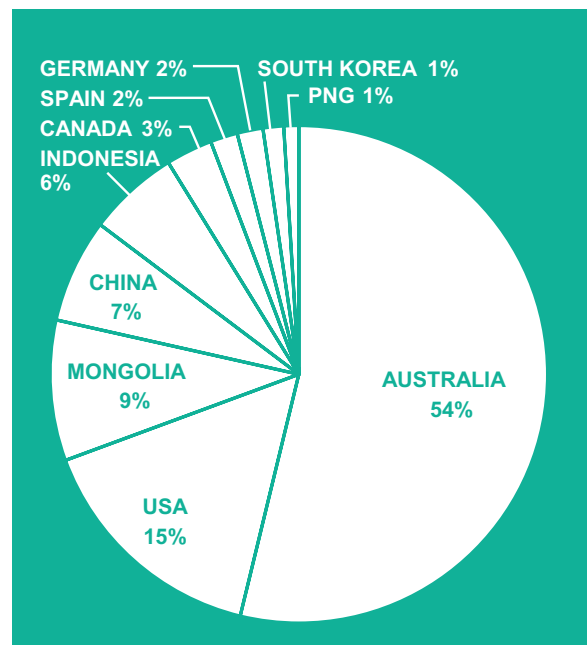




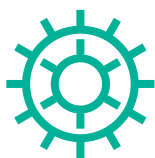
### 2.3 SUPPLY CHAINS

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

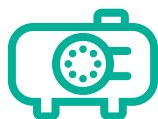
The majority of Clough’s materials and equipment is procured in Australia, with Clough spending approximately fifty-four percent of its total supplier spend on Australian suppliers<sup>1</sup>. The top ten countries, based on supplier spend, from which Clough procured materials and equipment are set out below, together with the percentage spend per country<sup>2</sup>.



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



Rotating Mechanical Equipment



Pressure Vessels



Electrical Equipment



Structural Steels

<sup>1</sup> This data is based on Clough’s spend on materials and equipment between 2015 and 2020.

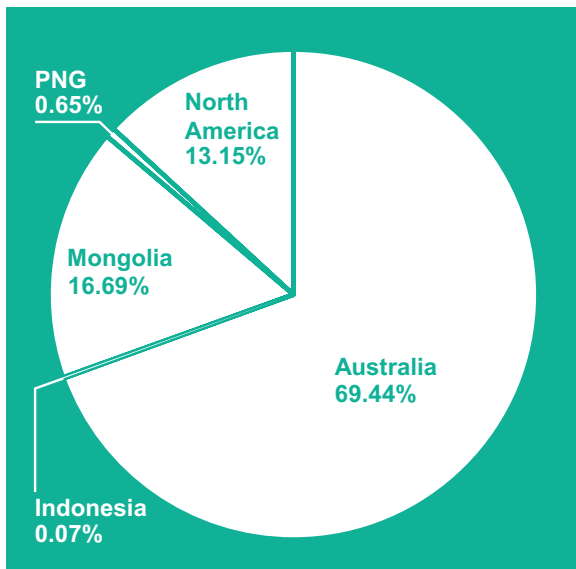
<sup>2</sup> This data is based on Clough’s spend on materials and equipment between 2015 and 2020.

## 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 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 based<sup>3</sup>.

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.



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 addition to this, the construction supply chain comprises millions of raw materials and components used to construct complex infrastructure, some of which also have elevated risks of modern slavery.

During the reporting period, Clough Reporting Entities carried out a supply chain risk assessment, which focused on its first tier suppliers. Clough Reporting Entities commenced this assessment by reviewing reputable data of geographical regions with a high prevalence of modern slavery together with the goods and materials at highest risk of modern slavery practices. Clough Reporting Entities then reviewed these high-risk regions, goods and materials against the regions from which Clough procures the majority of its materials and equipment.

After identifying classes of suppliers that presented elevated risks, Clough Reporting Entities implemented various measures to further 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.

<sup>3</sup> Based on data as at June 2020.



## 4 Actions to assess and address the risks

Below are some of the key measures Clough Reporting Entities had in place, or implemented during the first reporting period, 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 STRENGTHENING SUPPLY CHAIN TRANSPARENCY AND ACCOUNTABILITY

Clough Reporting Entities have identified various measures to improve transparency and accountability in its supply chains. During the reporting period, Clough Reporting Entities commenced implementing some of these measures, including those set out below.

- a) Conducting a risk assessment of its direct, global materials and equipment supply chains.
- b) Requiring domestic and international suppliers and subcontractors to comply with domestic and international modern slavery laws and standards.
- c) Requiring 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. 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.

## 5 Assessing effectiveness of actions

During the first reporting period, Clough Reporting Entities have focused on understanding modern slavery risks predominately within its supply chains and diagnosing any gaps in current practices. As set out above, Clough Reporting Entities implemented various additional measures to reduce modern slavery risks in its operations and supply chains. These measures have enabled Clough Reporting Entities to better positively identify suppliers and subcontractors that present an increased risk of modern slavery.

Following the first reporting period, Clough Reporting Entities conducted a review of its due diligence process undertaken prior to commencing

business activities in a new international jurisdiction. The review identified that the process was comprehensive and assessed compliance related risks in the relevant jurisdiction, however it could be expanded to specifically consider and address modern slavery risks in the jurisdiction. Clough Reporting Entities have subsequently incorporated this change.

Clough Reporting Entities intend 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 26 March 2021.

Peter Bennett  
Chief Executive Officer and Managing Director

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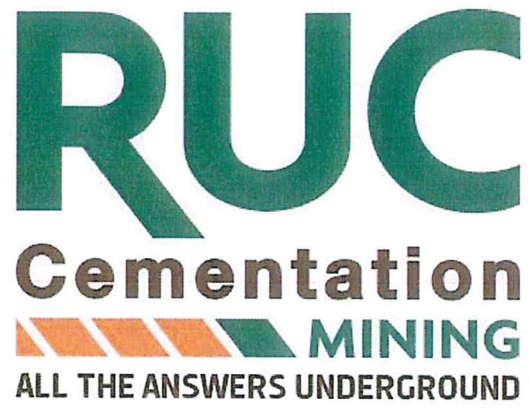


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# FY20 MODERN SLAVERY STATEMENT



**ALL THE ANSWERS UNDERGROUND**

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## 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 2020. References in this statement to ‘year’ or ‘period’ refer to the financial year ended 30 June 2020, 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 February 2021 RUC employs 1,500 people – 380 in Australia, 3 in Hong Kong, and 1,117 in Indonesia. RUC also employs several people in Mongolia/ Kazakhstan however, this labour engaged through RUC 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 603 suppliers and 29 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**

30 March 2021