

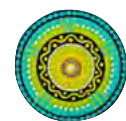


# INNOVATE

## Reconciliation Action Plan

April 2022 – March 2024





## THE ARTWORK

The front cover artwork is by Kalkadoon artist Chern'ee Sutton and takes inspiration from Clough's journey to reconciliation.

In my painting the large green and aqua community symbol in the bottom left of the painting represents Clough with the footprints representing their journey and growth. The footprints lead from the boomerang in the bottom left which represents the quality service and returning customers since Clough's foundation in 1919, with the state of Western Australia representing the humble beginnings of Clough in Perth. As the company grows, the footprints grow until Clough becomes a global workforce which is represented by the community symbol/meeting place in the top right corner. The Australia in the centre shows Clough's Australian offices in Perth, Brisbane and Sydney.

The three orange circles with symbols in the centre represents the markets which Clough is involved in, these markets are Resources, Energy and Infrastructure. The three yellow and orange dotted circles represents some of the services which Clough provides, Engineering, Construction, Commissioning, and Decommissioning, the U symbols which surround them symbolise the many employees who provide these services. These are all connected by the large orange and black circle, this represents how the markets and services are all connected to each other and to Clough.

The five blue stars in the middle of the painting represent Clough's principles, which are, Be Courageous, Achieve Zero Harm, Make it Personal, Always Do What's Right and Make a Positive Impact. These stars are in the shape of the southern cross, to represent their connection to Australia, even as they grow and evolve into a global workforce. The sprout represents the importance of environmental protection and sustainability which runs deep into Clough's foundation and values.



The Dhari and rainbow serpent represent Aboriginal and Torres Strait Islander cultures and histories which has been a part of our nation for the last 60,000 years at least and the sun represents Clough Group's vision for reconciliation. The sun's rays reach throughout the painting, showing the far-reaching effects of this vision.

The kangaroo and emu footprints represent the RAP Working Group which is always moving forwards and never backwards. The dotted circle behind them represents Clough's RAP and the four U symbols represent each area of the RAP, which are relationships, respect, governance, and opportunities.

The handprints represent the support that Clough gives to their growing workforce and the connection that they have to each other, and the mountains, leaves and waterholes around the edge of the painting represent the vast areas and landscapes on which Clough works, from the desert and outback to the rainforests and bush to coastlines and waterways.

### Artwork Title: Our Journey

*Size – 183cm wide X 91cm high  
Medium – Acrylic and textured  
acrylic on canvas*

### About the Artist:

Chern'ee Sutton is a proud Kalkadoon woman and Aboriginal artist from Mount Isa, Queensland, Australia who is passionate about her culture and history and wants to share that with the rest of the world through her art. Her unique style combines two worlds of traditional Aboriginal heritage with a modern contemporary twist which has caught the eyes of collectors around the world including Royalty and on the 2018 Commonwealth Games mascot Borobi. Chern'ee has her artwork hanging in The Royal Collection in Buckingham Palace, Queensland Parliament House, Queensland State Library and has exhibited her artworks in London, Tokyo, Singapore, Hong Kong, Melbourne and Sydney.

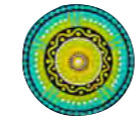
Due to Chern'ee's passion for reconciliation and equality she has received numerous accolades including National NAIDOC Youth of The Year, Australia Day Awards for 2013 and 2014, Queensland Pride of Australia Award, Local NAIDOC Awards including Artist of the Year and has been an Australia Day Ambassador for the past 6 years.



Smoking Ceremony at the Waitsia Gas Project Stage 2, Dongara, WA

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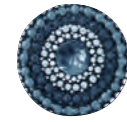
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## ACKNOWLEDGEMENT OF COUNTRY

Clough acknowledges the Traditional Owners and Custodians of the land in which we live and work.

We honour and respect the cultural heritage, customs and beliefs of all Aboriginal and Torres Strait Islander Peoples and we pay our respect to their Elders past, present and emerging.



## MESSAGE FROM CEO

Since launching our first Reconciliation Action Plan (RAP) in 2020, we have embedded more than 60 actions and initiatives that aim to improve outcomes for Aboriginal and Torres Strait Islander Peoples by providing employment, education, and business opportunities and to create a workplace that understands and values Aboriginal and Torres Strait Islander cultures. I am proud to be able to now present our second Innovate Reconciliation Action Plan as part of our ongoing commitment to reconciliation.

This Innovate RAP provides us with a pathway to continue building on our company's reconciliation journey. We know we still have a long way to go, and we are committed to working side-by-side with Traditional Owners and Aboriginal and Torres Strait Islander communities as we make positive changes across our offices and projects. Clough supports the Uluru Statement from the Heart and is committed to the co-design process on all of our projects. We are also committed to working with Reconciliation Australia and I look forward to updating you on our progress.

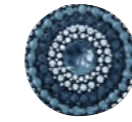
In the pages that follow we share our reflections on our reconciliation journey over the past two years and our ambition for the next two.

I would like to thank Reconciliation Australia, local Aboriginal and Torres Strait Islander communities, and our other partners and friends for their continued collaboration and guidance on this important journey. We see diversity as an advantage in everything we do, and our RAP is our commitment to an inclusive and equitable culture that supports and gives opportunities to Australia's Aboriginal and Torres Strait Islander peoples.

I fully endorse our Innovate RAP and look forward to working with our RAP Working Group and colleagues throughout the organisation as we continue to make progress with our reconciliation journey.



**Peter Bennett, CEO & MD  
Clough**



## MESSAGE FROM RECONCILIATION AUSTRALIA

Reconciliation Australia commends Clough on the formal endorsement of its second Innovate Reconciliation Action Plan (RAP).

Since 2006, RAPs have provided a framework for organisations to leverage their structures and diverse spheres of influence to support the national reconciliation movement.

With over 2.3 million people now either working or studying in an organisation with a RAP, the program's potential for impact is greater than ever. Clough continues to be part of a strong network of more than 1,100 corporate, government, and not-for-profit organisations that have taken goodwill and transformed it into action.

The four RAP types — Reflect, Innovate, Stretch and Elevate — allow RAP partners to continuously strengthen reconciliation commitments and constantly strive to apply learnings in new ways.

An Innovate RAP is a crucial and rewarding period in an organisation's reconciliation journey. It is a time to build the strong foundations and relationships that ensure sustainable, thoughtful, and impactful RAP outcomes into the future.

An integral part of building these foundations is reflecting on and cataloguing the successes and challenges of previous RAPs. Learnings gained through effort and innovation are invaluable resources that Clough will continuously draw upon to create RAP commitments rooted in experience and maturity.

These learnings extend to Clough using the lens of reconciliation to better understand its core business, sphere of influence, and diverse community of staff and stakeholders.

The RAP program's emphasis on *relationships, respect, and opportunities* gives organisations a framework from which to foster connections with Aboriginal and Torres Strait Islander peoples rooted in mutual collaboration and trust.



This Innovate RAP is an opportunity for Clough to strengthen these relationships, gain crucial experience, and nurture connections that will become the lifeblood of its future RAP commitments. By enabling and empowering staff to contribute to this process, Clough will ensure shared and cooperative success in the long-term.

Gaining experience and reflecting on pertinent learnings will ensure the sustainability of Clough's future RAPs and reconciliation initiatives, providing meaningful impact toward Australia's reconciliation journey.

Congratulations Clough on your second Innovate RAP and I look forward to following your ongoing reconciliation journey.

**Karen Mundine, Chief Executive Officer  
Reconciliation Australia**



## OUR BUSINESS

Clough is a pioneering engineering and construction company established in 1919 in Perth, Western Australia.

Clough delivers sustainable high performing assets for the infrastructure, resources and energy industries underpinned by a dedication to problem solving and getting the job done safely and efficiently.

Clough aims to be the most respected engineering and construction company in the world in the energy, resources and infrastructure industries delivering projects that help build a more sustainable world through the exceptional depth and industry experience of our people. That is why we see diversity as an advantage in everything we do. The more diverse the workforce, the more diverse the thinking.

Over the past 103 years, Clough has worked hard to earn an enviable reputation as a great employer, and we can attribute much of this to the strong Clough culture established within our business. We are proud to make a positive impact and enrich the lives in the communities in which we work and live through our scholarships, internships and graduate program, the Clough Foundation and our approach to diversity and inclusion.

Our RAP is our commitment to an inclusive and equitable culture that supports and gives opportunities to Australia's Aboriginal and Torres Strait Islander peoples.

In Australia, we employ around 1,000 people across our offices in Perth, Sydney and Brisbane and

multiple project sites across the country. At peak in 2021 we employed 28 Aboriginal and Torres Strait Islander employees and currently we have 12 Aboriginal and Torres Strait Islander employees working across our various locations in Australia.

Clough works across a range of different locations, communities and industries and as such our sphere of influence is wide and shifts with the projects we deliver. We have five projects under development in Australia: two in Western Australia and three in New South Wales

### Western Australia:

- Waitsia Gas Project Stage 2 in Dongara and
- Stephenson Avenue Extension Project in Perth

### New South Wales:

- Tallawarra Stage B in Yallah
- Project Energy Connect in Wagga Wagga and,
- Snowy 2.0 in Cooma

In 2021, we engaged with over 680 suppliers and subcontractors across Australia for the supply of merchandise and Personal Protective Equipment as well as specialist machinery and technical support. In addition, we are members of 22 industry bodies and several Aboriginal and Torres Strait Islander community groups and organisations with whom we collaborate, promote and support on a daily basis to continue to work towards the change we want to see in reconciliation.



## OUR PRINCIPLES

Our principles are our shared beliefs that guide our behaviours and actions.

### Be courageous

**We are pioneers. We're not afraid to try something new, to push the boundaries of what's possible and go where others won't.**

### Achieve zero harm

**We work sustainably and continue to set new safety and performance benchmarks every single day.**

### Make it personal

**We take responsibility for getting the job done, safely and efficiently.**

### Always do what's right

**We strive for the best in everything we do and always find solutions when plans need to be challenged.**

### Make a positive impact

**We enrich the lives of those in the communities in which we work and live.**



## OUR VISION FOR RECONCILIATION

Our vision is to improve outcomes for Aboriginal and Torres Strait Islander Peoples by providing employment, education and business opportunities and to create a workplace that understands and values Aboriginal and Torres Strait Islander cultures.

We have made the conscious decision to carry over our vision from our first RAP into our second RAP, acknowledging that our journey towards reconciliation continues. Whilst we have made excellent progress in advancing our reconciliation objectives across our organisation over the last 2 years, our journey is by no means complete.

Therefore whilst our vision remains the same, this Innovate RAP focuses on building greater momentum through individual accountability to deliver outcomes for Aboriginal and Torres Strait Islander Peoples. Specifically, this RAP will:

- Invest in developing better understanding of Aboriginal and Torres Strait Islander cultures and create engaging opportunities to learn more about their histories and ensure our workplace is culturally safe.
- Innovate to create meaningful employment and education opportunities for Aboriginal and Torres Strait Islander Peoples and grow representation in our supply chain.

- Lead the reconciliation process by supporting this vision through our words and our actions ensuring our policies and processes are free of bias and discrimination, and by striving to be a positive influence in the engineering and construction industry and for the communities where we operate.

We are proud to deliver our vision for reconciliation, which is influenced by our organisation's principle to Make a POSITIVE IMPACT and enrich the lives of those in the communities in which we work and live. Our RAP framework has three pillars—Relationships, Respect, and Opportunities, supported by a strong foundation of Governance.

We have a deep commitment to seeing our vision come to life and delivering what we have set out to achieve. We do not underestimate the challenge, however, the Clough team is committed and motivated by the journey ahead. We are confident through delivering this plan, we will be one step closer to achieving our vision and help make a difference in our community.





# HIGHLIGHTS OF OUR JOURNEY

## RELATIONSHIPS

In the last two years we have built relationships with several Aboriginal and Torres Strait Islander organisations. These relationships have facilitated opportunities for us to support these organisations in achieving their goals. They have also been critical to deepening our understanding of Aboriginal and Torres Strait Islander peoples and cultures.

- **Partnered with six organisations to improve outcomes for Aboriginal and Torres Strait Islander Peoples** – As part of the Clough Foundation we have worked closely with the Stars Foundation, Clontarf, Girls Academy, and Starlight Children’s Foundation’s Heathier Future Initiative in addition to Supply Nation and Carey Training.
- **Grew relationships with the younger generations** – We hosted three worksite visits in our corporate office with 30 year 11 and year 12 students from Clontarf and Stars Foundation to generate curiosity in a career in the engineering and construction industry.
- **Embedded our RAP artwork** – Our RAP artwork was proudly featured across the organisation from polo shirts and PPE (work shirts) through to merchandising and equipment on project sites.



Stars Foundation Futures Forum

## Case Study: Building relationships with the local community

### The Clough Foundation partnership with Stars Foundation

In July 2021, The Clough Foundation signed a partnership agreement with Stars Foundation to support their work with Aboriginal and Torres Strait Islander girls and young women.

Stars Foundation Founder and CEO Andrea Goddard said: "Clough Foundation's support will help Stars address the socioeconomic disadvantage and inequality many Indigenous girls and young women experience. We know that empowering Aboriginal and Torres Strait Islander young women through education delivers significantly improved economic, health and social outcomes. Results not only benefit the students themselves but extend to their future families and wider communities."

"Our Stars mentoring programs help create supportive, culturally safe learning environments – providing the support students need to make the most out of their educational experiences," Andrea added.

Since Stars began operating programs in the Northern Territory in 2015, they've achieved remarkable education and health improvements amongst their students.

Stars Foundation has programs in WA, NT, Qld and Vic. that are tailored to meet the unique needs of Aboriginal and Torres Strait Islander girls and young women with the aim of promoting positive education, employment and life outcomes.

To launch this partnership, Clough's Perth office welcomed two groups of Year 11 and Year 12 students from Butler, Coodanup and Girrawheen high schools. The students heard from Clough team members to learn about all the different functions and career pathways in the engineering and construction industry.

Kaisha, Transition Mentor at Stars Foundation said: "It was one of the best Transition Events I have experienced. The students couldn't stop talking about it and sharing their thoughts on the day with others. Everyone at Clough was friendly and approachable. Mixing with colleagues and the executive team was a lovely way to end the day."



## RESPECT

Through engagement with local Aboriginal and Torres Strait Islander leaders and through cultural awareness training, our colleagues have a strengthened understanding and appreciation of Aboriginal and Torres Strait Islander cultures.

Day-to-day, we take opportunities to raise the profile of Aboriginal and Torres Strait Islander cultures in our working environment. We celebrated NAIDOC week 2020 with the official launch of our RAP where our colleagues in Perth and Brisbane participated in an artwork collaboration with local Noongar artists Troy Bennell and Aurora Abraham and MA Deadly Art in Brisbane.

To support the understanding and appreciation of Aboriginal and Torres Strait Islander cultures, in 2021, our NAIDOC week celebration included the launch of our RAP library in every Australian office. Our library holds a variety of Aboriginal and Torres Strait Islander authors and styles including books for children and young adults.

To openly acknowledge the Aboriginal and Torres Strait Islander owners of the land that our offices are built, every Clough office now displays a plaque in the reception area.

- **Strengthened understanding** - Over 645 employees across the country completed cultural awareness training over the 2020 and 2021 period.
- **Celebrating Aboriginal and Torres Strait Islander cultures** - In addition to our RAP launch, we hosted a range of events to celebrate National Reconciliation Week, and NAIDOC week including Noongar Language workshops, Native Title Masterclass, and live music and Noongar songs by Madjital Moorna.

## Case Study: Celebrating every step of our journey

In 2020, we officially launched our Reconciliation Action Plan. The event was streamed across our Perth, Sydney and Brisbane offices. The RAP launch included a formal introduction to Clough's RAP, highlighting our commitment to improving outcomes for Aboriginal and Torres Strait Islander peoples, and discussing why reconciliation is important and how our RAP supports reconciliation.

The session was facilitated by Marilyn Morgan, who has lived and worked in Noongar Country, Western Australia for the past 30 years and has ancestral connections to the Western Arrernte people of central Australia.

The launch was timed during the celebration of NAIDOC week and our team in Perth and Brisbane were involved in an artwork collaboration with local Aboriginal artists.

The final outcome were two unique pieces that are currently displayed in each office.



Students from Belmont Clontarf Academy visit Clough's Perth office



Josh Tidswell at Waitsia Gas Project Stage 2, Dongara, WA

## OPPORTUNITIES

We are making progress across three fronts to create additional opportunities to build Aboriginal and Torres Strait Islander engagement with Clough by providing employment, education and business opportunities.

### Employment and Education opportunities

- In partnership with Carey Training, we commenced seven trainees on our South Flank OHP project in Western Australia. The traineeship program was a new initiative for Clough, offering positions across a range of qualifications including rigging, trades assistants, stores, and business administration. Upon successful graduation, the trainees were all offered positions with Clough on the South Flank OHP Project.
- Six Aboriginal and Torres Strait Islander trainees successfully completed traineeships.
- Pre-employment training program for nine Aboriginal and Torres Strait Islander participants was run in Wagga, New South Wales.
- Our Perth office commenced an Indigenous School Based Traineeship program in February 2021 and our first School Based Trainee is currently completing her Certificate II in Workplace Skills.
- We participated in two MEEDAC Community and Employment Expos at Central Regional TAFE in Geraldton, Western Australia to promote employment opportunities on the Waitsia Gas Project Stage 2.
- We sponsored the Indigenous Employment Forum in Brisbane organised in partnership with First Australians Chamber of Commerce & Industry.

### Business opportunities

- Since we implemented our RAP in February 2020, we have spent over \$25 million to date with Aboriginal and Torres Strait Islander businesses. This represents an increase from 2% in the 2020 financial year to over 4% of our overall spend this financial year.
- We currently work with 22 Aboriginal businesses and to increase this number, we have participated and sponsored business forums in Perth and Brisbane, in addition to organising our own “Meet the Buyer” event in Perth where 15 Aboriginal owned businesses were introduced to key decision makers.

## Case Study: Employment and Education Opportunities

### Working with Josh Tidswell, Trade Assistant, Waitsia Gas Project Stage 2 in Western Australia

In 2020, Clough, in partnership with Carey Training, welcomed seven Aboriginal and Torres Strait Islander trainees to its team working on BHP’s South Flank project. One of these trainees was Josh Tidswell who joined the team as a Civil Construction Trainee. This is Josh’s story...

“I joined the Carey Training program and the South Flank project in 2020 as a Civil Construction trainee. When I was interviewed, I said that I liked mechanical work, as I’ve always been interested in cars. At home I fix my own cars, I guess you could call me a Bush Mechanic.

The team on South Flank put me in with the Mechanical team which was good, one of the best things that I’ve ever done actually. The team was awesome, they took me in and taught me a lot of new things. I was working on all different machinery, plant, generators, trucks and buses, and I gained a lot of new knowledge.

I completed nine months with the Carey Training and Clough traineeship before transitioning over to Clough fully and seeing out the end of the project as a Trade Assistant. In the end I was on site for over 12 months on a 3 and 1 roster. Working away has pros and cons; being away from my children and family was hard, but knowing that my family was alright at home financially was important to me. When you’re away you’ve got to make a family away from your family, which was lucky enough to do with the other mechanics. I keep in contact with them a lot still.

That Civil Construction role was my first time in the construction industry, and I

liked seeing all the big lifts and seeing everything come together.

When I was offered the contract of further employment with Clough I knew that I wanted to follow the mechanical path. At the moment, I’m helping to set up the yard for the Waitsia Gas Project Stage 2. I work with the logistics team helping them sort out materials. I’m enjoying this role because with this one I get to be home every night with my family.

The traineeship and work with Clough has definitely helped me see the path I want to follow. I’d like to do an apprenticeship next in Mechanics, it’s something that I like doing. You get busy on projects but if you’re doing something you like that you’re passionate about that makes it easy.”

## Case Study: Employment and Education Opportunities

### Working with the Cooma community in New South Wales

As part of the Future Generation Joint Venture, we recently celebrated the graduation of nine Aboriginal and Torres Strait Islander participants from our Pre-Employment Program on the iconic Snowy 2.0 Project in Cooma, New South Wales.

Participants learned how to carry out and measure calculations, use construction tools and equipment and meet WHS requirements in addition to working at heights and confined spaces. Congratulations to all program graduates.

The Future Generation Joint Venture developed the program in partnership with TAFE NSW after consultation with the Aboriginal community.

## Case Study: Business Opportunities

### Working with Garla Barna Local Aboriginal Company for the Waitsia Gas Project Stage 2 Development in Western Australia

We awarded the bulk earthworks scope for the Waitsia Gas Project Stage 2 development in the northern Perth Basin to Garla Barna Civil & Mining (GBCM), a local Mid West Aboriginal owned business.

We and the Waitsia Joint Venture (Mitsui E&P Australia and Beach Energy) are committed to delivering a high performing project while providing opportunities to the local community at every stage of the project and this award demonstrates that. Our Innovate Reconciliation Action Plan drives our commitment to improve outcomes for Aboriginal and Torres Strait Islander

peoples by providing employment, education and business opportunities.

GBCM was established in 2019 as an emerging regional based Aboriginal services contractor offering project solutions in Western Australia. GBCM respects the land, the Traditional Owners and the Aboriginal cultures in all the areas they work. Their intent is to maximise opportunities for Aboriginal Peoples in the construction industry, creating hope and career paths for future generations.

Fred Taylor, GBCM Director and shareholder, said “GBCM are pleased that Clough have provided our company with this opportunity on a project that is being built on our traditional lands. We are excited to be working with Clough in the delivery of this scope and look forward to the engagement this project brings to the Mid West and the Southern Yamatji people.”

Tanya Johnson, GBCM Director and shareholder, said: “GBCM is thrilled to form part of Clough’s ongoing reconciliation efforts in being engaged on the Waitsia Gas Project Stage 2. We look forward to the many connections, collaborations and engagement this project and the award to GBCM brings to the local region.”





## GOVERNANCE

The key to successfully delivering our 2020-2022 Innovate RAP was the leadership behind it.

### Clough Executive Committee (EXCOM)

Our EXCOM provided leadership and direction for our RAP and they will continue to assist with implementation and encourage the participation of all employees to make sure we deliver on our RAP commitments for our 2022-2024 RAP.

### RAP Champion

Our Chief Financial Officer, Richard Simons, is our RAP Champion. Richard sits on the Clough Limited Board and has significant influence across Clough decisions. He is committed to improving Aboriginal and Torres Strait Islander outcomes as evidenced through his coaching, mentoring and support as a non-executive director of Aboriginal owned businesses. He is passionate about driving and championing engagement of our RAP both within and outside of Clough. Richard will continue as Chair of our RAP Working Group, in addition to being the Executive Sponsor, leading the implementation of RAP actions and driving accountability for the delivery of the targets.

### RAP Working Group

Our RAP Working group members for our 2022-2024 RAP are responsible for overseeing the development and implementation of our RAP. They also play a key role in being advocates to build understanding and awareness amongst employees.

Our RAP Working group is chaired by our CFO and RAP Champion, Richard Simons and represents a wide range of functions, locations and levels in the business. We have three employees who identify as Aboriginal people on our RAP Working Group and senior Aboriginal woman Marilyn Morgan, Kambarang Services, has provided advice and ensured a strong Aboriginal Community Voice has been heard on the Clough RAP journey.

NAME	ROLE	LOCATION
Andrew Thomsen	Planner	Brisbane
Brent Maas	Vice President, Services, QLD & PNG	Brisbane
Brooke Wilson	EA to Senior Vice President Operations	Perth
Cynthia Calderon	Head of Corporate Affairs and Stakeholder Engagement	Perth
Devon Cowan	Senior Buyer/Expeditor & Indigenous Procurement Liaison Officer	Perth
Gavin Croll	Senior Project Manager	Perth
Geoff Scott	Operations Manager	Cooma
Joshua Yeats	Procurement Manager	Brisbane
Jason Ponosh	Construction Director - APAC	Perth
Jocelyn Kelly	Administration Assistant - Receptionist	Perth
Jody Kershaw	Senior Indigenous and OD Advisor	Perth
John Galvin	Executive Vice President, Australia & Asia Pacific	Perth
Paul Farris	Vice President – New South Wales	Sydney
Paul Moore	Operations Manager	Brisbane
Renee Rugless	Tendering & Proposals Manager - APAC	Perth
Richard Simons	Chief Financial Officer	Perth



## REFLECTIONS ON OUR JOURNEY SO FAR

While we are proud of the impact we've had in our journey towards reconciliation we know our journey still has a long way to go. We still have much to learn about Aboriginal and Torres Strait Islander communities and how we can work together to achieve positive outcomes. It is important to recognise the impact that COVID-19 had on the business and the agreed deliverables to achieve our previous RAP. There are several lessons gained that will help steer our efforts in the coming years:

- Expand our RAP Working Group and create an Employee Reconciliation Network that represents all of our office and project locations.
- Continue to improve reporting and data analytics particularly from our joint venture projects to track current progress and inform future project employment, training, and business engagement initiatives.
- Improve our Aboriginal and Torres Strait Islander employment participation rates across all areas of the business.
- We have a relatively small number of Aboriginal and Torres Strait Islander employees in leadership roles. More work needs to be done to ensure we provide the support, mentoring and development necessary to retain and progress our people.

## SEE THE FOLLOWING PAGES FOR OUR COMMITMENTS FOR 2022-2024



Reconciliation Library, Perth, launched during Reconciliation Week





# RELATIONSHIPS

We will continue to invest in building and maintaining sustainable relationships with Aboriginal and Torres Strait Islander Peoples and stakeholders to create engaging opportunities to learn, respect, and celebrate shared histories to ensure our workplace is culturally respectful and safe.

By forging stronger relationships and promoting accountability with all our employees, partners and suppliers, we believe we will be better placed to work together to solve problems and create employment, education and business opportunities for Aboriginal and Torres Strait Islander Peoples.

Through the following actions, we pledge to work collaboratively with Aboriginal and Torres Strait Islander stakeholders to create long-lasting and mutually beneficial relationships:

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Establish and maintain mutually beneficial relationships with Aboriginal and Torres Strait Islander stakeholders and organisations.	Develop guiding principles with local Aboriginal and Torres Strait Islander stakeholders and organisations for future engagement.	June 2022	Senior Indigenous & Organisational Development Advisor
	Review and implement an engagement plan to work with Aboriginal and Torres Strait Islander stakeholders and organisations.	June 2022	Head of Corporate Affairs and Stakeholder Engagement
	Meet with local Traditional Owners at each project site location and discuss their participation in our RAP vision.	August 2022, August 2023	Construction Director - APAC
	Promote and maintain partnerships with Clontarf Foundation, Stars Foundation and Starlight Foundation Ear Bus Program to invest in future Aboriginal and Torres Strait Islander success.	April 2022, April 2023	Head of Corporate Affairs and Stakeholder Engagement
	Promote a volunteering program that provides opportunities for employees to directly engage and build relationships with Aboriginal and Torres Strait Islander Peoples and cultures.	August 2022	Head of Corporate Affairs and Stakeholder Engagement
Build relationships through celebrating National Reconciliation Week (NRW).	Circulate Reconciliation Australia's NRW resources and reconciliation materials to our staff.	May 2022, May 2023	Head of Corporate Affairs and Stakeholder Engagement
	Executive team and RAP Working Group to participate in one external event per year to recognise and celebrate NRW.	27 May – 3 June 2022 and 2023	Senior Indigenous & Organisational Development Advisor
	Promote NRW through internal communications and encourage staff to participate in external events to recognise and celebrate NRW.	27 May – 3 June 2022 and 2023	Head of Corporate Affairs and Stakeholder Engagement
	Organise at least one NRW event each year in our Perth, Brisbane and Sydney Offices and across our Clough projects.	27 May – 3 June 2022 and 2023	Community and Stakeholder Engagement Advisor
	Register all our NRW events on Reconciliation Australia's NRW website.	May 2022, May 2023	Senior Indigenous & Organisational Development Advisor

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Promote reconciliation through our sphere of influence.	Communicate the RAP and promote policies that impact RAP outcomes to all employees, highlighting how the outcomes of the RAP are benefiting Aboriginal and Torres Strait Islander peoples, Clough and the Nation.	May 2022, March 2023	Head of Corporate Affairs and Stakeholder Engagement
	Launch and celebrate the RAP milestones through a series of events and communications ensuring participation of local Aboriginal and Torres Strait Islander peoples.	May 2022	Head of Corporate Affairs and Stakeholder Engagement
	Implement strategies to engage our staff in reconciliation through regular communication campaigns, promotion of internal and external events and development of a RAP hub on our Intranet.	May 2022, April 2023	Head of Corporate Affairs and Stakeholder Engagement
	Communicate our commitment to reconciliation publicly through social media and external websites.	June 2022, June 2023	Head of Corporate Affairs and Stakeholder Engagement
	Promote our commitment to reconciliation through regular stakeholder and community engagement events and initiatives.	July 2022, July 2023	Head of Corporate Affairs and Stakeholder Engagement
	Collaborate with the RAP Network and/or other like-minded organisations to develop ways to advance reconciliation.	August 2022, August 2023	Senior Indigenous & Organisational Development Advisor
Promote positive race relations through anti-discrimination strategies.	Review, update and communicate Clough's Code of Conduct, Workplace Behaviour, Diversity and Inclusion, Workplace Fair Treatment and Grievance policies and procedures to ensure anti-discrimination provisions are addressed.	April 2022	Vice President, Human Resources APAC
	Engage with Aboriginal and Torres Strait Islander staff and/or Aboriginal and Torres Strait Islander advisors to consult on our anti-discrimination policies.	May 2022	Vice President, Human Resources APAC
	Provide cultural safety training education opportunities for senior leaders to develop awareness on the effects of racism and unconscious bias.	February 2023	Senior Indigenous & Organisational Development Advisor
	Senior leaders to publicly support anti-discrimination and anti-racism campaigns and initiatives such as the "Racism. It Stops with Me" campaign and the UN International Day for the Elimination of Racial Discrimination.	March 2023	Executive Vice President, Australia & Asia Pacific





We acknowledge that Aboriginal and Torres Strait Islander peoples are the Traditional Custodians of the land in which we live and work and we respect their continuing histories and cultures.

We will continue to invest in developing better understanding of Aboriginal and Torres Strait Islander cultures and create engaging opportunities to learn more about their histories and knowledge to ensure our workplace is culturally safe.

We aim for an inclusive and respectful work environment in which our staff are accountable and continuously developing their understanding and respect for Aboriginal and Torres Strait Islander cultures and our Aboriginal and Torres Strait Islander employees feel welcomed and valued for the wealth of knowledge they bring to Clough.

Though the following actions, we pledge to create an inclusive and culturally safe workplace that respects the continuing histories and cultures of Aboriginal and Torres Strait Islander Peoples:

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Increase understanding, value and recognition of Aboriginal and Torres Strait Islander cultures, histories, knowledge and rights through cultural learning.	Conduct a review of cultural learning needs within our organisation.	May 2022	Senior Indigenous & Organisational Development Advisor
	Revise and implement our Aboriginal and Torres Strait Islander cultural awareness training strategy for our staff which defines cultural learning needs of employees.	May 2022	Senior Indigenous & Organisational Development Advisor
	Consult local Traditional Owners and/or Aboriginal and Torres Strait Islander advisors on the development and delivery of cultural awareness training program in each of our office and project locations.	May 2022	Senior Indigenous & Organisational Development Advisor
	Ensure all new employees complete online cultural awareness training as part of their mandatory onboarding.	September 2022	Learning & Development Manager - APAC
	Provide opportunities for RAP Working Group members, HR Managers and senior leaders to participate in formal cultural awareness, cultural safety and on Country programs.	July 2022	Senior Indigenous & Organisational Development Advisor
	Provide opportunities for our staff to develop an understanding of the importance of Cultural Heritage Management.	March 2023	Senior Indigenous & Organisational Development Advisor

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Demonstrate respect to Aboriginal and Torres Strait Islander peoples by observing cultural protocols.	Continue to increase our staff's understanding of the purpose and significance of cultural protocols by reviewing and communicating our cultural protocols document to all staff.	June 2022	Senior Indigenous & Organisational Development Advisor
	Engage an Aboriginal and Torres Strait Islander consultant to provide advice on cultural heritage, identifying appropriate Traditional Owners and cultural protocols across Australia.	June 2022	Senior Indigenous & Organisational Development Advisor
	Invite a local Traditional Owner or Custodian to provide a Welcome to Country or other appropriate cultural protocol at significant events each year in each of our office locations and at the commencement of our projects.	May 2022, April 2023	Head of Corporate Affairs and Stakeholder Engagement
	Continue to include an Acknowledgement of Country or other appropriate protocols at the commencement of important meetings.	April 2022, April 2023	Executive Vice President, Australia & Asia Pacific
	Ensure that all project inductions include Acknowledgement of Country and information about the local Aboriginal and Torres Strait Islander peoples and histories.	May 2022, May 2023	Learning & Development Manager - APAC
	Source and display Aboriginal and Torres Strait Islander Artwork from regions where our projects are located in all office locations.	April 2023	Head of Corporate Affairs and Stakeholder Engagement
Build respect for Aboriginal and Torres Strait Islander cultures and histories by celebrating NAIDOC Week and other days of cultural significance.	Display an Acknowledgement of Country plaque at all new office locations.	April 2023	Senior Indigenous & Organisational Development Advisor
	Host at least one internal NAIDOC week event at all office and project locations.	July 2022, July 2023	Head of Corporate Affairs and Stakeholder Engagement
	RAP Working Group to participate in an external NAIDOC Week event.	July 2022, July 2023	Senior Indigenous & Organisational Development Advisor
	Continue to review HR policies and procedures to remove barriers to staff participating in NAIDOC Week.	June 2022	Vice President, Human Resources APAC
	Promote and encourage staff to participate in external NAIDOC events through our intranet, website and social media.	June 2022, June 2023	Head of Corporate Affairs and Stakeholder Engagement
	Communicate an annual RAP Events calendar that recognises dates and events of significance to Aboriginal and Torres Strait Islander peoples.	April 2022, February 2023	Head of Corporate Affairs and Stakeholder Engagement Development Advisor





# OPPORTUNITIES

We are committed to using innovation to create meaningful employment, training and education opportunities for Aboriginal and Torres Strait Islander Peoples and grow representation in our organisation and supply chain.

Through our words and actions, we will ensure our policies and processes are free of bias and discrimination and will set an example in our industry to better understand the needs and aspirations of Aboriginal and Torres Strait Islander Peoples, and to encourage them to consider Clough as an employer and partner of choice.

Through the following actions, we pledge to improve outcomes for Aboriginal and Torres Strait Islander Peoples by providing employment, education and business opportunities:

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Improve employment outcomes by increasing Aboriginal and Torres Strait Islander recruitment, retention and professional development.	Build understanding of current Aboriginal and Torres Strait Islander staffing to inform future employment and professional development opportunities.	Monthly, Review September 2022, September 2023	Senior Indigenous & Organisational Development Advisor
	Engage with Aboriginal and Torres Strait Islander staff and consultants to codesign and implement a targeted recruitment, retention and professional development strategy.	September 2022	Vice President, Human Resources APAC
	Audit advertising of job vacancies to ensure they are effectively reaching Aboriginal and Torres Strait Islander stakeholders.	October 2022	Recruitment Manager
	Continue to review HR and recruitment procedures and policies to remove barriers to Aboriginal and Torres Strait Islander participation in our workplace.	August 2022	Vice President, Human Resources APAC
	Increase the percentage of Aboriginal and Torres Strait Islander staff employed in our workforce to a minimum of 2%.	March 2024	Vice President, Human Resources APAC
	Build pathways for Aboriginal and Torres Strait Islander Peoples to progress into Leadership roles.	Provide opportunities for Aboriginal and Torres Strait Islander employees to participate in a mentor or coaching program to develop leadership skills.	June 2023
Provide support for Aboriginal and Torres Strait Islander employees to participate in learning and development activities to progress leadership skills.		July 2023	Learning & Development Manager - APAC
Actively promote initiatives to increase Aboriginal and Torres Strait Islander employment prospects and development opportunities within the communities in which we operate.	Establish relationships with at least one new school, university and/or organisation to promote work experience and internship opportunities for Aboriginal and Torres Strait Islander students annually.	October 2022, October 2023	Senior Indigenous & Organisational Development Advisor
	Increase the number of traineeship, apprenticeship, internship and graduate role opportunities to Aboriginal and Torres Strait Islander students.	November 2022, November 2023	Learning & Development Manager - APAC
	Support at least one Aboriginal and Torres Strait Islander charity, fundraiser and/or events to cement Clough's commitment to Closing the Gap each year..	August 2022, August 2023	Chief Financial Officer

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Increase Aboriginal and Torres Strait Islander supplier diversity to support improved economic and social outcomes.	Review and communicate our Aboriginal and Torres Strait Islander procurement strategy.	April 2022, April 2023	Senior Buyer/Expeditor & Indigenous Procurement Liaison Officer
	Increase the share of our procurement spend with Aboriginal and Torres Strait Islander suppliers each year.	July 2022, July 2023	Executive Vice President, Australia & Asia Pacific
	Revise our Subcontractor Agreements to ensure our subcontractors are held accountable for supporting Aboriginal and Torres Strait Islander participation, development and spend on projects.	May 2022	Vice President Commercial
	Maintain Supply Nation membership.	May 2022, May 2023	Executive Vice President, Australia & Asia Pacific
	Continue to participate in trade events across each of our office locations to investigate new opportunities to engage Aboriginal and Torres Strait Islander suppliers.	May 2023	APAC Supply Chain Manager
	Investigate opportunities to support Aboriginal and Torres Strait Islander businesses and organisations providing environmentally sustainable programs.	June 2023	Head of HSSE
	Develop and communicate opportunities for procurement of goods and services from Aboriginal and Torres Strait Islander businesses to staff by actively participating in trade shows and hosting meet the buyer sessions.	May 2022, May 2023	Senior Buyer/Expeditor & Indigenous Procurement Liaison Officer
	Audit our current procurement practices to ensure all barriers to procuring goods and services from Aboriginal and Torres Strait Islander businesses are removed.	June 2022	APAC Supply Chain Manager
	Engage with Traditional Owner groups early in project commencement to allow bid-packages to be structured to suit the capability of local Aboriginal and Torres Strait Islander businesses.	June 2022, June 2023	Construction Director - APAC
	Develop at least four new commercial relationships with Aboriginal and/or Torres Strait Islander businesses each year.	July 2022, July 2023	Executive Vice President, Australia & Asia Pacific
Provide pro-bono support and mentoring to Aboriginal and Torres Strait Islander owned businesses to develop their business capability.	June 2023	Executive Vice President, Australia & Asia Pacific	



# GOVERNANCE

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Establish and maintain an effective RAP Working group (RWG) to drive governance of the RAP.	Maintain Aboriginal and Torres Strait Islander representation on the RWG.	April 2022, April 2023	Senior Indigenous & Organisational Development Advisor
	Review and communicate a Terms of Reference for the RWG.	April 2022	Senior Indigenous & Organisational Development Advisor
	Meet at least four times per year to drive and monitor RAP implementation.	April, June, September and December 2022 March, June, September and December 2023	Senior Indigenous & Organisational Development Advisor
Provide appropriate support for effective implementation of RAP commitments.	Define resource needs for RAP implementation.	April 2022, April 2023	Chief Financial Officer
	Engage our senior leaders and other staff in the delivery of RAP commitments.	September 2022, September 2023	Chief Financial Officer
	Define and maintain appropriate systems to track, measure and report on RAP commitments.	Monthly, Review September 2022, September 2023	Senior Indigenous & Organisational Development Advisor
	Continue to improve reporting and data analytics particularly from our JV projects to accurately track current progress.	October 2022	Executive Vice President, Australia & Asia Pacific
	Maintain an internal RAP Champion from senior management.	April 2022	Chief Financial Officer
	Establish an Employee Reconciliation Network that represents our office and project locations to support the implementation of RAP commitments across all of our operations.	March 2023	Construction Director - APAC

ACTION	DELIVERABLE	TIMELINE	RESPONSIBILITY
Build accountability and transparency through reporting RAP achievements, challenges and learnings both internally and externally.	Contact Reconciliation Australia to ensure that our primary and secondary contacts are up-to-date to ensure we are receiving important correspondence.	June 2022, June 2023	Senior Indigenous & Organisational Development Advisor
	Follow up with Reconciliation Australia if we have not yet received our unique reporting link to participate in the RAP Impact Measurement Questionnaire.	August 2022, August 2023	Senior Indigenous & Organisational Development Advisor
	Complete and submit the annual RAP Impact Measurement Questionnaire to Reconciliation Australia.	September 2022, September 2023	Senior Indigenous & Organisational Development Advisor
	Report RAP progress to all staff and senior leaders quarterly.	April, June, September and December 2022, March, June, September and December 2023	Head of Corporate Affairs and Stakeholder Engagement
	Publicly report our RAP achievements, challenges and learnings, annually.	April 2023, April 2024	Head of Corporate Affairs and Stakeholder Engagement
	Investigate participating in Reconciliation Australia's biennial Workplace RAP Barometer.	April 2022	Senior Indigenous & Organisational Development Advisor
Continue our reconciliation journey by developing our next RAP.	Register via Reconciliation Australia's website to begin developing our next RAP.	September 2023	Senior Indigenous & Organisational Development Advisor





## Contact Details

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