



INNOVATE

Reconciliation Action Plan

Final Report 2022-2024

ABOUT THE ARTWORK

"Our Journey"

The graphic elements used in this report form part of the original design that was developed for the Innovate Clough Reconciliation Action Plan 2022-2024. The artwork is by Kalkadoon artist **Chern'ee Sutton** and takes inspiration from Clough's journey to reconciliation.



ACKNOWLEDGEMENT OF COUNTRY

Clough acknowledges the Traditional Owners and Custodians of the lands on 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.

Clough recognises it is our collective efforts and responsibility as individuals, communities and businesses to ensure equality, recognition and advancement of Aboriginal and Torres Strait Islander Peoples across all aspects of society and everyday life.

EXECUTIVE SUMMARY

We have completed our second Innovate Reconciliation Action Plan (RAP) 2022-2024.

Since the beginning of our reconciliation journey in 2020, Clough has embedded more than 60 actions and initiatives to achieve its vision for reconciliation, which 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've seen our business grow on its commitment to deliver on this vision year upon year, and it has served as a guide for the business to better understand how we can make a positive impact and enrich the lives of those in the communities in which we work and live.

Recent years presented challenges to the Clough business that translated into a change of ownership but our commitment to deliver on our RAP has always remained. With our new parent company, Webuild, a new brand, and as one of three organisations representing Webuild in Australia, the Group is better positioned than ever before to build stronger relationships with Aboriginal and Torres Strait Islander communities and deliver greater outcomes across a larger national footprint.

The lessons we have learned stand us in better stead to realise our journey to reconciliation and achieve the deliverables we set for our next RAP.

The results included in this final report represent the achievements and lessons learned between April 2022 and March 2024, across the four pillars of the RAP: relationships, respect, opportunities, and governance.



+60

RAP actions
and initiatives
embedded



2022

We commissioned Chern'ee Sutton, a proud Kalkadoon woman and Aboriginal artist from Mount Isa, Queensland, to design the cover art for our Second RAP, this artwork has been proudly displayed in our office in Brisbane, on a range of merchandise and on site vehicles.



We engaged Noongar artist, Mel Spillman (Woods) from Maarakool Art, to design a statement mural, *Our Journey*, for our new headquarters in Perth.

We organised a "Meet the artist" session with Noongar artist, Mel Spillman (Woods), to share the story of her artwork, *Our Journey*, with our team.



We invited Year 8 students from the Geraldton Clontarf Foundation Academy to visit the Waitsia Gas Project Stage 2 site in Dongara to learn about site life and the project.



Future Generation JV (FGJV) unveiled its commissioned artwork by local Wiradjuri artist, Luke Penrith, on the Snowy 2.0 Project. - *Landscape of the Snowy Mountains – Working Together*.

We organised a number of events for our team for NAIDOC Week around the country including flag raising, smoking ceremonies, collaborative artworks and cultural awareness training.



To celebrate NAIDOC week, we engaged Mel Spillman (Woods) from Maarakool Art to lead the design and development of a collaborative artwork for the Perth office – hundreds of employees contributed to a beautiful piece that is on display in the lunch area.

We attended the Queensland Government First Nations Connect events in Brisbane and Gold Coast. The Southeast Regional First Nations Business Connect events are a chance to connect Aboriginal and Torres Strait Islander businesses, industry, executive stakeholders, and government representatives.



We awarded a \$4.5M Bussing Services subcontract to Murujuga Commercial Transport, a Karratha based Aboriginal business, to provide transportation services to transfer staff and workers on two bussing routes, from Airport to Camp and Site to Camp for the duration of the project.

We ran a collaborative training and information session with IPS Management Consultants to develop the Group's vision for its next Reconciliation Action Plan.

Our team attended the 2024 Stars Foundation's Futures Forum hosted by The University of Notre Dame, which brought together over 70 Year 12 students from across WA.



2023



We launched our second Innovate Reconciliation Action Plan, endorsed by Reconciliation Australia.

Our teams in Perth and Brisbane attended the Walk for Reconciliation.



We visited the Coomaditchie United Aboriginal Corporation and learned about the deep history and culture of Dharawal people and land, and had the privilege of creating a collaborative artwork with the guidance of Aunty Lorraine and Aunty Narelle for a project in New South Wales.



We attended the Stars Foundation Futures Forum, speaking to young women and helping them to explore career opportunities in the construction industry.



We attended the 'Bush Tucker Experience', learning about native plants in the Perth office community garden.

Our teams in Perth and Brisbane attended the Walk for Reconciliation and public events like Challenging Change – First Nations Business event in Perth.

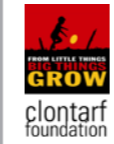


Our Waitsia Project in Dongara wrapped various site vehicles showcasing our RAP artwork.



We created opportunities to recognise Aboriginal and Torres Strait Islander cultures in our working environment, as well as marking significant events throughout the year, including NAIDOC Week, National Reconciliation Week, Indigenous Literacy Day, Sorry Day, National Close the Gap Day, and International Day for the Elimination of Racial Discrimination.

We invited Year 8 students from the Geraldton Clontarf Foundation Academy to visit the Waitsia Gas Project Stage 2 site in Dongara to learn about site life and the project.



We continued our partnerships with four organisations to improve outcomes for Aboriginal and Torres Strait Islander Peoples. We work closely with the Clontarf Foundation, Stars Foundation, and Starlight Children's Foundation's Healthier Futures Initiative, additionally we are a proud partner of Supply Nation.

2024

We held a Meet the Buyer event in Karratha which was delivered in partnership with our joint venture partner Saipem and our client Perdaman in support of the Ceres Urea Plant Project. This event was a great opportunity to meet local and First Nations business and understand the capabilities in the region.



We engaged with artist Leah Cummins, a proud Mayi woman from North-Western Queensland for the creation of our next Innovate Reconciliation Action Plan.



We awarded a \$16M contract to local Northern Territory and Indigenous owned business, Wilga Indigenous Corporation, for the Darwin Ship Lift Project.

TIMELINE





CASE STUDIES

Supporting education and employment outcomes

Clough has long standing partnerships with Clontarf Foundation and Stars Foundation, organisations dedicated to furthering Indigenous education outcomes and employment prospects.

We have worked with these organisations to showcase what opportunities are available within the construction industry. This has involved a series of Open Days where students have been invited into our corporate office to experience the work undertaken in the corporate environment and a series of site visits to experience work undertaken in the field.

In August of 2023, our team on the Waitsia Gas Project hosted a group of students on site, giving them a first-hand look at the dynamic world of engineering and construction. Our team connected with the students, sharing advice, exchanging knowledge, and igniting sparks of inspiration for the next generation.

We have seen these sparks kindled into a flame with students attending site visits and Open Days going on to receive traineeships and job placements. One such student was Stars Foundation Student, Kyeesha.



Waitsia Gas Project Site Visit with Clontarf Foundation, Dongara, Western Australia

Kyeesha joined the Corporate Affairs and Stakeholder Engagement as part of the Clough Traineeship to complete her Certificate II in Workplace Skills. Kyeesha attended the Clough open day with the Stars Foundation and was interested in 'how everything worked behind the scenes' and impressed by the 'feel good environment.'

During the Open Day, Kyeesha asked if there were any traineeships available. She provided her contact details along with an expression of interest and was soon invited to join the traineeship program. Over her time at Clough, Kyeesha had the opportunity to learn about lots of different functions across the business, gaining invaluable insights into the professional workplace.

"One of the things I will take away from this experience is understanding how people work across different areas of the office but also how I work in the office, understanding my strengths and weaknesses," – Kyeesha.



[Scan here to watch Kyeesha's interview](#)

Clough also runs a number of traineeships and apprenticeships for Aboriginal and Torres Strait candidates.

Alayah Hill, started her journey working at Clough two years ago, when she was a year 12 graduate. Alayah joined the business through our traineeship program, undertaking a Certificate II in Business. Alayah now works for the company as a Resourcing Administrator.

"My traineeship journey with Clough began when I was offered the opportunity to come out and do an interview after I had been applying and looking into different traineeships across different industries. I was only fifteen at the time and thought the office was too fancy for me but instantly felt welcomed when I came in".

"I've recently joined the Recruitment team, and I've been developing more skills and I have been learning what it's all about to work in that department and I am so excited to continue expanding my knowledge and skills."



NAIDOC Week at the Snowy 2.0 Project, Cooma, New South Wales

NAIDOC Week – Future Generation Joint Venture 2022

At the Snowy 2.0 Project, which is situated on Wiradjuri, Walgalu, and Ngarigo Country, NAIDOC Week 2022 was marked by reflection, celebration, and collaboration.

Luke Penrith's artwork, *Landscape of the Snowy Mountains – Working Together*, was revealed across the sites. The artwork serves as a visual representation of the project's ethos of collaboration and respect for Country. The replicas were printed by local businesses and served as a reminder of collective responsibility in fostering reconciliation.

The week featured a series of practical initiatives, including the distribution of reusable water bottles with Luke's artwork on them. Additionally, the artwork was incorporated into Personal Protective Equipment shirts, with the proceeds going to support Aboriginal community development activities in the local area.

Led by Shane Herrington, a Wolgalu Wiradjuri man, Indigenous Awareness Training programs were conducted across project sites, imparting traditional cultural practices and knowledge to the workforce. These sessions underscored the importance of understanding and respecting Aboriginal culture, fostering inclusivity and mutual respect.

To ensure sustained engagement and collaboration, dedicated forums were established for team members to provide feedback and contribute to Indigenous initiatives.

Future Generation Joint Venture is committed to honouring and preserving Indigenous heritage throughout the project's lifecycle, as they deliver Australia's largest hydro-pumped project – underpinning Australia's transition to a renewable energy future.

NAIDOC Week 2023 – Collaborative Artwork with Mel Spillman (Woods)

In celebration of NAIDOC Week, our Perth Office took part in a collaborative artwork session led by proud Noongar artist Mel Spillman (Woods). We would like to sincerely thank Mel for taking the time to create this beautiful work of art with our people, to recognise and honour First Nations Peoples and Elders.

The artwork depicts the movement of knowledge from Indigenous Elders to the next generation, celebrating this year's NAIDOC week theme 'For Our Elders'.

NAIDOC Week is an opportunity to acknowledge the history, culture and achievements of Aboriginal and Torres Strait Islander Peoples in Australia and participate in celebrations of the oldest, continuous living cultures on earth. As we continue to live, work and gather on land traditionally owned by First Nations Peoples, we recognise their continuing connection to lands, waters and communities and acknowledge their Elders past, present and emerging.



[Scan here to watch the timelapse video](#)



Collaborative Artwork Session with Mel Spillman (Woods), Perth, Western Australia



Saipem Clough Joint Venture Awarded Bussing Subcontract to Murujuga Commercial Transport

Following a decade-long relationship between Perdaman and Murujuga Aboriginal Corporation (MAC), Saipem Clough Joint Venture (SCJV), responsible for delivering Perdaman's Ceres Urea Project, awarded a \$4.5M Bussing Services subcontract to Murujuga Commercial Transport, a Karratha based Aboriginal business. This is an important and significant contribution to the creation of value in the territory in which the JV operates.

Murujuga Commercial Transport (MCT) aims to maximise economic, social and environmental returns to support independence for current and future generations of the Murujuga community.

MCT will be responsible for the provision of transportation services to transfer staff and workers on two bussing routes, from Airport to Camp and Site to Camp for the duration of the project.

It is anticipated that at the peak of construction, the project will be utilising over 20, 50+ seat busses under a Dry Hire Arrangement.

SCJV, together with Perdaman, are committed to providing meaningful business and employment opportunities to local and Indigenous People and leaving a positive legacy in the community.

Clough BMD Joint Venture awards first major subcontract package to Wilga Indigenous Corporation

Clough BMD Joint Venture (JV) awarded Wilga Indigenous Corporation, a Darwin based business, a \$16.9M contract for the supply of approximately 430,000 tonnes of rock for the construction of the Darwin Ship Lift Facility.

Since the project award in September 2023, Clough BMD JV's focus remains on concurrently progressing procurement activities, working closely with the Territory Government to provide opportunities for local businesses and Territorians to be involved in this significant project.

Clough BMD JV will construct the facility to meet the needs of the general fishing and maritime sector and the current and long-term needs of the Department of Defence and the Australian Border Force, with a local first approach. The JV is committed to making a positive impact across the Territory through education, employment, business opportunities and community initiatives.

During the peak of construction, over 250 workers will be employed, with an average of 100 workers on-site throughout construction. Upon completion, the ship lift facility will provide hundreds of local jobs within the maritime support sector, contributing significantly to the region's economic growth and stability.

Supporting Torres Strait Islander Businesses

Through Clough's membership with Supply Nation, we have gained a greater network with Indigenous businesses across the country to support our diverse project needs. In March 2024, we engaged with AKA & Co, a Supply Nation certified Torres Strait Island vendor for the supply of merchandise for the Lombrum Infrastructure Project team, located in Papua New Guinea. This contract signified the business' first ever purchase order awarded to a Torres Strait Island vendor.



RAP 2022-2024 SNAPSHOT OF ACHIEVEMENTS

Since the RAP was launched in 2022, at 30 January 2024, 67 of the 75 deliverables had been achieved (89%). The seven deliverables partially achieved were directly impacted by the COVID-19 pandemic, including limited access to the community and events unable to be delivered.

 **Achieved**

 **Partially Achieved**

 **Not Achieved**

	RELATIONSHIPS	RESPECT	OPPORTUNITIES	GOVERNANCE
Achieved	17	17	18	15
Partially Achieved	2	1	3	1
Not Achieved	1	0	0	0

Achieved - The deliverable was achieved in full.

Partially Achieved - Part of the deliverable was achieved.

Not Achieved - The deliverable was not achieved.





RELATIONSHIPS

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.

That is why we have committed over the past two years to working collaboratively with Aboriginal and Torres Strait Islander stakeholders to create long-lasting and mutually beneficial relationships.

ACTION	DELIVERABLE	OUTCOME
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.	● Aboriginal and Torres Strait Islander stakeholders and organisations including Stars Foundation, Clontarf Foundation, Supply Nation and local Aboriginal Corporations in the areas of our operations were consulted with to guide and develop yearly plans for engagement.
	Review and implement an engagement plan to work with Aboriginal and Torres Strait Islander stakeholders and organisations.	●
	Meet with local Traditional Owners at each project site location and discuss their participation in our RAP vision.	● We have engaged with local Traditional Owners to deliver Welcome to Country and Smoking Ceremonies upon commencement of our projects. Engagement often includes involvement in cultural awareness and participation in local NRW and NAIDOC events.
	Promote and maintain partnerships with Clontarf Foundation, Stars Foundation and Startlight's Children's Foundation's Healthier Futures Initiative to invest in future Aboriginal and Torres Strait Islander success.	● Clough have continued our partnership with Clontarf Foundation since 2014, Startlight's Children's Foundation's Healthier Futures Initiative in collaboration with Earbus Foundation since 2017 and the Stars Foundation since 2021.
	Promote a volunteering program that provides opportunities for employees to directly engage and build relationships with Aboriginal and Torres Strait Islander Peoples and cultures.	● This initiative was put on hold as Clough entered Voluntary Administration in 2022. This action will be reviewed as part of the next RAP.
Build relationships through celebrating National Reconciliation Week (NRW).	Circulate Reconciliation Australia's NRW resources and reconciliation materials to our staff.	● Email announcements were sent in 2022 and 2023 promoting NRW resources and community events in each of the states we operate in.
	Executive team and RAP Working Group to participate in one external event per year to recognise and celebrate NRW.	● External NRW events were promoted as part of the RAP Working Group Meetings. The team attended the NRW Virtual Breakfast on Friday, 27 May 2022 hosted by Reconciliation WA which featured a Welcome to Country, cultural entertainment, a keynote presentation, and a panel discussion with guests from across WA regions. In 2023, the RAP Working Group participated in the Walk for Reconciliation in Perth.
	Promote NRW through internal communications and encourage staff to participate in external events to recognise and celebrate NRW.	● NRW was promoted through a number of communications, stories on our intranet and posts on our social media channels. In 2022 we launched a commemorative Logo designed by Noongar Artist Mel Spillman (Woods) from Maarakool Art that represents Clough's journey towards reconciliation. In 2023 we shared ten external community events including virtual events and events located in Perth, Brisbane, Sydney and Melbourne for our employees to participate in. We also encouraged employees across all of our projects throughout 2022 and 2023 to participate in NRW by creating NRW toolbox notices and displaying posters in staff and crib rooms.
	Organise at least one NRW event each year in our Perth, Brisbane and Sydney Offices and across our Clough projects.	● In 2022 NRW was celebrated with a series of internal and external communications including a video from Chern'ee Sutton discussing the story behind Clough's RAP artwork. On our Tallawarra Stage B Power Station project in NSW, a collaborative artwork was created with the Coomaditchie United Aboriginal Corporation and unveiled as part of NRW celebrations. In 2023 NRW was celebrated around our offices with a morning tea and presentation overview of our second Innovate Reconciliation Action Plan achievements.
	Register all our NRW events on Reconciliation Australia's NRW website.	● We registered all of our NRW events on Reconciliation Australia's NRW website on 11 May 2022 and 22 May 2023.

ACTION	DELIVERABLE	OUTCOME
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.	● RAP Announcement and communications are sent regularly. We communicate events, initiatives and promote our partnerships sharing the impact these programs have on Aboriginal and Torres Strait Islander outcomes. In October 2023 we presented a session to our parent company Webuild in Milan to promote our RAP and provide awareness of how the actions are benefiting Aboriginal and Torres Strait Islander Peoples and the community.
	Launch and celebrate the RAP milestones through a series of events and communications ensuring participation of local Aboriginal and Torres Strait Islander Peoples.	● Clough's second Innovate RAP launch was celebrated during NRW week in June 2022. The launch was celebrated through a series of communications and a video from Chern'ee Sutton discussing the story behind Clough's RAP artwork. This was followed by the official unveiling of the artwork in our Brisbane office. We recognised one year of our Second Innovate RAP in June 2023 by sharing our highlights through a presentation celebrating partnerships and opportunities. The presentation was delivered across our offices by our RAP Working Group and shared on social media.
	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.	● The Intranet homepage features a calendar recognising RAP events and celebrating days of significance. Our Community News features RAP stories such as Clontarf site visits to promote reconciliation to our employees. We have also created a dedicated RAP Hub on our Intranet which connects our employees with our RAP documents, resources and recent RAP news. We promote our RAP through regular communications and through showcasing our RAP artwork throughout the business, from wrapping plant and equipment on our project sites to incorporating artwork on our Microsoft Teams background.
	Communicate our commitment to reconciliation publicly through social media and external websites.	● Clough signed the joint statement of RAP organisations in support for the Voice referendum. We communicated our support publicly through our social media channels.
	Promote our commitment to reconciliation through regular stakeholder and community engagement events and initiatives.	● We have hosted and participated in a number of community engagement initiatives including Smoking Ceremonies and Welcome to Country events across our projects. In November 2022 we attended the Stars Foundation Futures Forum at Girrawheen Highschool. The event was an opportunity for businesses to engage with Stars Foundation students to share a variety of post-school pathways for their future. In August 2022 and 2023 we hosted the Year 8 students from Geraldton Clontarf Foundation for a site visit to our Waitsia Gas Project Stage 2. The students learned about the engineering and construction industry, hearing personal career journeys of our employees and learning about life on camp. In November 2023 the Moree and Narrabri Clontarf Academy students from NSW delivered a presentation at our Perth office sharing the impact the program had on their lives. Our staff also visited the Kent St Clontarf Academy, connecting with Clontarf students at their Good Bunch Lunch.
	Collaborate with the RAP Network and/or other like-minded organisations to develop ways to advance reconciliation.	● In addition to regularly collaborating with industry, we regularly participate in external organisation events and knowledge sharing sessions including Minderoo Foundation, Diversity Council Australia, Waaitj Foundation and Supply Nation to advance reconciliation.





RELATIONSHIPS CONT.

ACTION	DELIVERABLE	OUTCOME
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.	The Workplace Behaviour Policy was updated in June 2023 and outlines anti-discrimination provisions. An Acceptable Workplace Behaviours survey was completed to inform future improvements towards creating a safer and more respectful workplace.
	Engage with Aboriginal and Torres Strait Islander staff and/or Aboriginal and Torres Strait Islander advisors to consult on our anti-discrimination policies.	Our Policy for Indigenous Relations was reviewed by an external consultant. Feedback will be incorporated into a review of policies in 2024.
	Provide cultural safety training education opportunities for senior leaders to develop awareness on the effects of racism and unconscious bias.	Due to resourcing constraints we were unable to deliver planned educational opportunities. We did deliver some sessions on general Unconscious Bias throughout the year however we recognise we need to do more in this space. Unconscious Bias and racism awareness have been identified for development as part of our 2024-2025 plans.
	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.	Clough has been a proud signatory of the "Racism. It Stops With Me" campaign since 2021. On 21 March 2023, our CEO Peter Bennett published a CEO Announcement to recognise the International Day for the Elimination of Racial Discrimination and promote the "Racism. It Stops With Me campaign".

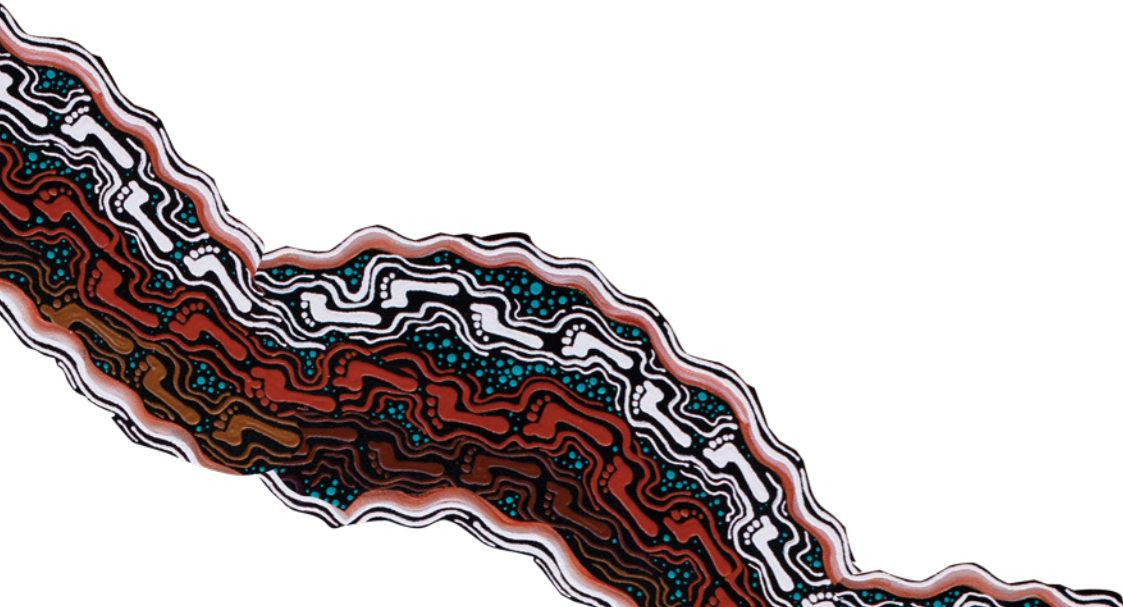


RESPECT

We acknowledge that Aboriginal and Torres Strait Islander Peoples are the Traditional Custodians of the lands on which we live and work and we respect their continuing histories and cultures.

We have been striving to develop better understanding of Aboriginal and Torres Strait Islander cultures and create engaging opportunities for our workforce to learn more about their histories and knowledge to ensure our workplace is culturally safe through a range of community engagement initiatives.

ACTION	DELIVERABLE	OUTCOME
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.	In October 2022 Clough participated in the RAP Workplace Barometer to measure attitudes towards reconciliation and assess cultural learning. The findings informed the review and development of the Cultural Awareness Training Strategy for 2023.
	Revise and implement our Aboriginal and Torres Strait Islander cultural awareness training strategy for our staff which defines cultural learning needs of employees.	The Cultural Awareness Training Strategy was revised in 2022 and 2023 to take into account resourcing and projects. The strategy was endorsed by the RAP Working Group and will be implemented through 2024.
	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.	Local Traditional Owners are consulted in the areas of our office and project locations to deliver cultural awareness programs. In June 2022 in consultation with local advisors, our Stephenson Avenue Extension project completed a Cultural Competency Training program.
	Ensure all new employees complete online cultural awareness training as part of their mandatory onboarding.	The cultural awareness training module forms part of the onboarding requirements for all new employees. 866 employees have completed this training since we implemented this RAP (April 2022 - Dec 2023).
	Provide opportunities for RAP Working Group members, HR Managers and senior leaders to participate in formal cultural awareness, cultural safety and on Country programs.	In July 2023, Wolgalu Wiradjuri man Shane Herrington from Tamut visited 3 remote sites on our Snowy 2.0 Project. Smoking Ceremonies followed by Cultural Workshops to understand the land on which we work were delivered. On our Tallawarra Stage B Power Station project, Local Elder Uncle Richard Campbell held a Welcome to Country and Smoking Ceremony followed by a cultural awareness session on site. The project team learned about the history of the Wadi Wadi Mob, who were the First Nations Peoples on the lands surrounding the project site and were shown local artifacts rediscovered on the surrounding lands. Whilst we delivered some on Country cultural awareness programs across our projects, due to budget restrictions in 2022 as Clough entered Voluntary Administration, some of the programs that were planned were put on hold. We will look to provide more opportunities for our senior leaders to participate in cultural programs in our next RAP.
	Provide opportunities for our staff to develop an understanding of the importance of Cultural Heritage Management.	Cultural Heritage Management is included in our project inductions to provide awareness and education to our employees on the importance of Cultural Heritage.





RESPECT CONT.

ACTION	DELIVERABLE	OUTCOME
Demonstrate respect to Aboriginal and Torres Strait Islander Peoples by observing cultural protocols.	Continue to increase our employees' understanding of the purpose and significance of cultural protocols by reviewing and communicating our cultural protocols document to all staff.	● Clough has published a Cultural Protocols Guideline on the Clough Management System. Findings from RAP Workplace Barometer identified that more communication and education needs to be done in this area, particularly around understanding local Traditional Owner groups.
	Engage an Aboriginal and Torres Strait Islander consultant to provide advice on cultural heritage, identifying appropriate Traditional Owners and cultural protocols across Australia.	● Clough has consulted with local Aboriginal Corporations and engaged specialist Heritage Consultants to ensure cultural heritage and protocols are preserved. ● On the Ceres Urea Project, the project has developed a strong relationship with the Murujuga Aboriginal Corporation to agree cultural protocols for Welcome to Country, cultural awareness and to ensure Traditional Owners and Murujuga Aboriginal Corporation are involved in heritage management activities.
	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.	● As part of our official new Perth office opening in June 2022, Clough hosted a Welcome to Country and reveal of the Aboriginal artwork mural created by Noongar Artist Mel Spillman (Woods) of Maarakool Art. In 2022, as part of the Stephenson Avenue Extension project commencement, a traditional Smoking Ceremony conducted by Uncle Walter McGuire on site. ● In February 2023 as part of the Webuild and Clough celebration, a Welcome to Country and cultural dance was performed in Perth by local Aboriginal man Joshua Kelly. In Melbourne, the Webuild and Clough Welcome and Briefing was held at the MCG with the Wurundjeri Aboriginal Corporation performing the Welcome to Country. ● Our 50 Years in Brisbane celebration event in October 2023 featured a Welcome to Country by Tribal Experiences.
	Continue to include an Acknowledgement of Country or other appropriate protocols at the commencement of important meetings.	● We have created a placeholder in our PowerPoint presentation templates for an Acknowledgement of Country. The template features our RAP artwork and provides guidance to our employees on how to deliver an Acknowledgement of Country. We also shared a video on how to deliver a meaningful Acknowledgement of Country. ● In addition to our online cultural awareness module, all of our project inductions include content about the local Traditional Owners on which the project is located.
	Ensure that all project inductions include Acknowledgement of Country and information about the local Aboriginal and Torres Strait Islander Peoples and histories.	● In addition to our online cultural awareness module, all of our project inductions include content about the local Traditional Owners on which the project is located.
	Source and display Aboriginal and Torres Strait Islander Artwork from regions where our projects are located in all office locations.	● In our Perth QV1 office, we have a mural created by Noongar Artist Mel Spillman (Woods) of Maarakool Art. Our Brisbane office features our RAP artwork created by Kalkadoon artist Chern'ee Sutton. In NSW, on our Snowy 2.0 project we have artwork created by local Wiradjuri man Luke Penrith. Also in NSW, we have a collaborative artwork created with the Coomaditchie Art Centre displayed on our Tallawarra Stage B Power Station project.
	Display an Acknowledgement of Country plaque at all new office locations.	● Our Perth, Brisbane and Sydney offices all have an Acknowledgement of Country plaque installed in the reception area.



ACTION	DELIVERABLE	OUTCOME
Build respect for Aboriginal and Torres Strait Islander cultures and histories by celebrating NAIDOC Week and other days of cultural significance.	Host at least one internal NAIDOC week event at all office and project locations.	● In 2022, our Stephenson Avenue Extension project held a morning tea catered by Bindi Bindi Dreaming. Project artwork was created by the Djookana Sisters which was then featured on polo shirts and presented to the project team during NAIDOC Week. ● A Smoking Ceremony and cultural awareness session was held on site at Tallawarra Stage B Power Station project for NAIDOC 2023 ● In 2023 NAIDOC Week celebrations on Snowy 2.0 were led by Lobs Hole Elder on Country, Wolgalu-Wiradjuri man Garry 'Nooza' Bell from Tumut. The celebrations included a Welcome and Yarn. ● In Perth, a Collaborative Artwork session led by Noongar artist Mel Spillman (Woods) of Maarakool Art. Employees had the opportunity to contribute to the artwork which depicts the movement of knowledge from Aboriginal Elders to the next generation. ● Drink bottles featuring the RAP artwork were distributed to employees across the country to create awareness of our RAP and recognise NAIDOC week.
	RAP Working Group to participate in an external NAIDOC Week event.	● RAP Working Group members participated in internal events across our office and project locations. All members were encouraged to participate in external community events. In the Perth office members participated in the QV1 Plaza Smoking Ceremony.
	Continue to review HR policies and procedures to remove barriers to staff participating in NAIDOC Week.	● Our Leave Procedure includes a section on Cultural and Religious Leave which includes participation in NAIDOC week activities. Our projects also encouraged employee participation.
	Promote and encourage staff to participate in external NAIDOC events through our intranet, website and social media.	● Email announcements were sent in 2022 and 2023 promoting NAIDOC week community events in Perth, Brisbane, Sydney and Melbourne. A NAIDOC themed kids colouring sheet was shared with our employees to encourage family participation.
	Communicate an annual RAP Events calendar that recognises dates and events of significance to Aboriginal and Torres Strait Islander Peoples.	● All of our RAP events, including NAIDOC week events are recognised on the Clough Intranet home page. We also have a dedicated calendar on our RAP Hub that recognises days of cultural significance.



OPPORTUNITIES

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

We have been aiming to 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.

ACTION	DELIVERABLE	OUTCOME
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.	● Current Aboriginal and Torres Strait Islander participation reporting is completed on a monthly basis to track current progress and identify future engagement and development opportunities.
	Engage with Aboriginal and Torres Strait Islander staff and consultants to codesign and implement a targeted recruitment, retention and professional development strategy.	● Our recruitment, retention and development strategy is currently being revised as we align the Clough and Webuild Group. Across all of our projects, we engage with local Aboriginal and Torres Strait Islander Consultants to implement a targeted recruitment, retention and professional development strategy that is specific to the location and scope of the projects.
	Audit advertising of job vacancies to ensure they are effectively reaching Aboriginal and Torres Strait Islander stakeholders.	● As part of the Clough Hub system implementation, Clough's new Human Resource Management System, this data became difficult to report. Effectiveness of job advertisements in reaching the target audience is currently based on the successful recruitment of Aboriginal and Torres Strait Islander Employees. We will continue to improve this reporting metric in our next RAP to inform the effectiveness of each stage of our recruitment process.
	Continue to review HR and recruitment procedures and policies to remove barriers to Aboriginal and Torres Strait Islander participation in our workplace.	● We have included Cultural and Religious leave as part of our Leave Guideline, we promote Flexible Work Arrangements and continue to review HR and recruitment procedures to encourage Aboriginal and Torres Strait Islander participation in our workforce.
	Increase the percentage of Aboriginal and Torres Strait Islander staff employed in our workforce to a minimum of 2%.	● Clough has committed to increasing the percentage of Aboriginal and Torres Strait Islander staff employed in our workforce. We are currently at 2.2% participation.
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.	● Aboriginal and Torres Strait Islander employees have the option to participate in a formal Mentoring Program. The program runs annually facilitating experienced mentors to be matched with mentees, helping to develop their capability, assist in career development and build networks across the business. We have also created opportunities for Aboriginal and Torres Strait Islander employees to participate in external mentoring programs such as the NAWIC Mentoring Program to further extend networks and development.
	Provide support for Aboriginal and Torres Strait Islander employees to participate in learning and development activities to progress leadership skills.	● Through Clough's Australian Institute of Management (AIM) WA and AIM Access East Coast Premium Learning Partnership, Aboriginal and Torres Strait Islander employees can access over 175 training programs nationally to develop role specific, soft skills and development programs.
Actively promote initiatives to increase Aboriginal and Torres Strait Islander employment prospects and development opportunities within the communities is 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.	● We have established and maintained relationships with a number of schools and universities. We have hosted four worksite visits across our projects and our corporate office with over 40 students from Clontarf participating and learning about the engineering and construction industry. We also participated in the Stars Futures Forum event in Perth to present opportunities and pathways available at Clough to Year 11 and 12 students.
	Increase the number of traineeship, apprenticeship, internship and graduate role opportunities to Aboriginal and Torres Strait Islander students.	● In 2022, three Aboriginal Traineeships were successfully completed in our Perth office with two candidates continuing onto permanent positions. We have increased the number of Aboriginal and Torres Strait Islander trainees and apprentices with eight current apprentices across our projects. In our next RAP we will continue to focus on creating more internship and graduate role opportunities for Aboriginal and Torres Strait Islander students.
	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.	● Clough has continued to support organisations through Clough Foundation to further our commitment towards Closing the Gap. In 2023 on the Snowy 2.0 Project, Aboriginal artwork work shirts were made available for purchase with all money raised going to support local Aboriginal community development and support programs.



ACTION	DELIVERABLE	OUTCOME
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.	● The Aboriginal Procurement Guideline was reviewed in 2022 and published on Clough Management System.
	Increase the share of our procurement spend with Aboriginal and Torres Strait Islander suppliers each year.	● Over the duration of this RAP we have spent over \$32 million dollars with Aboriginal and Torres Strait Islander suppliers. This represents an increase in overall Aboriginal and Torres Strait Islander spend.
	Revise our Subcontractor Agreements to ensure our subcontractors are held accountable for supporting Aboriginal and Torres Strait Islander participation, development and spend on projects.	● Through our Subcontract Agreements on projects, we seek to flow down Aboriginal and Torres Strait Islander participation requirements to achieve the best outcomes.
	Maintain Supply Nation membership.	● In 2022 as we entered Voluntary Administration, Clough's Supply Nation membership was cancelled. In 2024 we have renewed our membership with Supply Nation. In April 2024 we launched an awareness session to educate our employees about the importance of supplier diversity and Supply Nation.
	Continue to participate in trade events across each of our office locations to investigate new opportunities to engage Aboriginal and Torres Strait Islander suppliers.	● In May 2022, five employees attended the Supply Nation CONNECT Trade Show in Sydney. In June 2023, Clough attended the Indigenous Business Connect events in Brisbane and the Gold coast hosted by the Queensland Government. We participated in Business News' Challenging Change 2023 Indigenous Business event. The event explored key issues, trends, and opportunities for Indigenous businesses in WA.
	Investigate opportunities to support Aboriginal and Torres Strait Islander businesses and organisations providing environmentally sustainable programs.	● As part of the Ceres Urea Project, Saipem Clough Joint Venture has awarded a \$4.5M Bussing Services subcontract to Murujuga Commercial Transport, a Karratha based Aboriginal business. Murujuga Commercial Transport aims to maximise economic, social and environmental returns to support independence for current and future generations of the Murujuga community. The project also supports the Murujuga Aboriginal Corporation Ranger Program to ensure the successful and sustainable management of Murujuga National Park.
	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.	● In 2022 the Stephenson Avenue Extension project hosted an Aboriginal Business Briefing at the Waalitj Foundation to promote opportunities on the project to local Aboriginal businesses. In August 2023, Saipem Clough Joint Venture and Perdaman teams hosted two Meet the Buyer events in Karratha to share more about the services and subcontracting opportunities on the Ceres Urea Plant project and encourage Aboriginal business participation.
	Audit our current procurement practices to ensure all barriers to procuring goods and services from Aboriginal and Torres Strait Islander businesses are removed.	● Barriers still exist for Aboriginal and Torres Strait Islander businesses in our Procurement processes. We have engaged a dedicated Vendor Manager and we are continuing to work through these barriers as we update our processes to align with Webuild Group.
	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.	● We have engaged with local Aboriginal Land Counsels and businesses early in project commencement to identify opportunities. As part of the Darwin Ship Lift Project, a local consultant was engaged and a detailed assessment of scope and local capability was completed to provide opportunities to local Aboriginal owned businesses. This assessment at tender stage also allowed time to potentially amend design to open opportunities for local content.
	Develop at least four new commercial relationships with Aboriginal and/or Torres Strait Islander businesses each year.	● This deliverable has been achieved with 22 Aboriginal and/or Torres Strait Islander businesses engaged throughout the RAP.
Provide pro-bono support and mentoring to Aboriginal and Torres Strait Islander owned businesses to develop their business capability.	● We are committed to developing Aboriginal and Torres Strait Islander business capability. We have provided informal support to assist businesses through the prequalification process for projects. In 2022, two of our employees provided pro-bono business coaching and mentoring to an Aboriginal business start-up through Waalitj Foundation.	

We are committed to tracking and reporting our achievement against actions to ensure we remain on target to deliver and accountable to all our internal and external stakeholders.

ACTION	DELIVERABLE	OUTCOME
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.	● In June 2023 we restructured our RAP Working Group to ensure representation across all of the key functions and operational areas. We have maintained three Aboriginal and Torres Strait Islander employees on the RAP Working Group.
	Review and communicate a Terms of Reference for the RWG.	● We have updated our RAP Working Group Charter to reflect the restructure of the RAP Working Group and continue to drive accountability.
	Meet at least four times per year to drive and monitor RAP implementation.	● The RAP Working Group has formally met nine times over the period of the RAP.
Provide appropriate support for effective implementation of RAP commitments.	Define resource needs for RAP implementation.	● An updated RAP Implementation Plan was developed each year with a supporting budget approved to ensure appropriate resources were allocated to meet the RAP deliverables.
	Engage our senior leaders and other staff in the delivery of RAP commitments.	● We have appointed operational representatives across all of our regions to drive senior leader and employee engagement and accountability for RAP commitments.
	Define and maintain appropriate systems to track, measure and report on RAP commitments.	● A RAP Implementation Plan was developed and maintained at each of the RWG meetings to track and measure progress against Clough's RAP commitments. Quarterly reports track current progress against participation and spend targets.
	Continue to improve reporting and data analytics particularly from our JV projects to accurately track current progress.	● As part of Clough's acquisition by Webuild Group, we are in the process of aligning systems and streamline reporting to drive future improvements. We will build utilise best practise reporting from JV projects and continue to focus on improving reporting across all of our projects into 2024.
	Maintain an internal RAP Champion from senior management.	● We have maintained an executive sponsor throughout the implementation of our RAP. John Galvin, Chief Bidding, Engineering & Concession Officer is our current executive sponsor and is the Chair of the RAP Working Group.
	Establish an Employee Reconciliation Network that represents our office and project locations to support the implementation of RAP commitments across all of our operations.	● We have established an Aboriginal and Torres Strait Islander Employee Group on our Snowy 2.0 Project in NSW. Whilst we have representation of our office and project locations on our RAP Working Group and RAP Subcommittees, we have not established a dedicated Employee Resource Group across all of our operations. This will be a focus on our next RAP.

ACTION	DELIVERABLE	OUTCOME
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.	● Our primary and secondary contacts were updated with Reconciliation Australia in November 2023.
	Follow up with Reconciliation Australia if we have not yet received our unique reporting link to participate in the RAP Impact Measurement Questionnaire.	● The RAP Impact Measurement Questionnaire was submitted to Reconciliation Australia in September of 2022 and 2023.
	Complete and submit the annual RAP Impact Measurement Questionnaire to Reconciliation Australia.	●
	Report RAP progress to all staff and senior leaders quarterly.	● Progress against targets are reported as part of the monthly reports. A summary of key actions and achievements is presented to the RAP Working Group quarterly.
	Publicly report our RAP achievements, challenges and learnings, annually.	● A final report of our first RAP was published in February 2022 and communicated to all employees, external stakeholders and made available on Clough Intranet and website. The results included in the report represent the achievements and lessons learned in the four pillars of the RAP: relationships, respect, opportunities, and governance. We recognised one year of our Second Innovate RAP in June 2023 by sharing our highlights, creating a presentation celebrating partnerships and opportunities.
Investigate participating in Reconciliation Australia's biennial Workplace RAP Barometer.	● Clough participated in the Workplace RAP Barometer in 2022 to measure our employees attitudes towards reconciliation, understand our strengths and identify areas of focus for future development.	
Continue our reconciliation journey by developing our next RAP.	Register via Reconciliation Australia's website to begin developing our next RAP.	● We have applied to register the development of our 2024 RAP with Reconciliation Australia in Nov 2023.



FURTHER INFORMATION

For further information, to download a copy of our reports, or to keep up-to-date on our RAP actions, visit <https://cloughgroup.com/sustainability/our-reconciliation-journey>

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