



Modern Slavery Statement 2024


Modern Slavery Statement

This joint Modern Slavery Statement (**Statement**) has been prepared by GoldlinQ Holdings Pty Ltd on behalf of itself and its controlled reporting entities in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) for the period from 1 January 2024 to 31 December 2024 (**Reporting Period**).

GoldlinQ understands the term Modern Slavery is used to cover a range of exploitative practices including:

- human trafficking
- servitude
- worker exploitation
- child labour
- forced marriage
- debt bonding
- deceptive recruiting
- slavery-like practices.

This Statement was approved by the Board of GoldlinQ Holdings Pty Ltd on 24 June 2025.



(signed)
Name: John Witheriff
Position: Director

Forward-looking statements

This statement contains forward-looking statements. Although we believe that the expectations reflected in any of our forward-looking statements are reasonable, actual results or outcomes could differ materially from those projected or assumed in any of our forward-looking statements. We disclaim and do not undertake any obligation to update or revise any forward-looking statement in this report, except as required by applicable law or regulation. Our strategies and targets will adapt given the dynamic conditions in which we operate and it should not be assumed that any particular strategies, targets or implementation measures are inflexible or frozen in time. No representation or warranty, express or implied, is given as to the accuracy, completeness or correctness, likelihood of achievement or reasonableness of any forward-looking information contained in this report. Forward-looking statements do not represent guarantees or predictions of future performance, and involve known and unknown risks, uncertainties, and other factors, many of which are beyond GoldlinQ's control, and which may cause actual results to differ materially from those expressed in the statements contained in this report.

CEO's Introduction

Entrusted with the delivery and operation of Gold Coast Light Rail, GoldlinQ is committed to operating ethically, transparently and in line with our community's expectations. This is GoldlinQ's third Modern Slavery Statement. It outlines our approach to identifying, managing and addressing modern slavery risks in our operations and our supply chains. This statement addresses each of the eight criteria to be reported on under the Act.

We acknowledge the challenges of identifying, managing and addressing modern slavery risks and commit to continuously looking to improve our systems and processes associated with this important area into the future. As with all aspects of the GoldlinQ business, we look to work closely with our network in this area – many of whom have made their own commitments in identifying, managing and addressing modern slavery risks.

This Statement has been approved by the GoldlinQ Holdings Pty Ltd Board and will be updated annually.

A handwritten signature in black ink, appearing to read 'Phil Mumford', is written over a horizontal line.

Phil Mumford
GoldlinQ CEO

The purpose of this Statement is to outline our approach to identifying, managing and addressing modern slavery risks in our operations and supply chains by addressing each of the eight criteria to be reported under the Act.

The terms 'GoldlinQ', 'our' and 'we' used in this Statement refer collectively to the three reporting entities detailed in section 1.

1. Identifying the reporting entities – criteria 1 (section 16(1)(a) of the Act)

The GoldlinQ Group consists of a number of special purpose entities established to deliver the Gold Coast Light Rail Project (**GCLR Project**) to the State of Queensland, acting through the Department of Transport and Main Roads.

This Statement applies to the following three reporting entities:

- i. GoldlinQ Holdings Pty Ltd, the parent entity;
- ii. GoldlinQ 3 Holdings Pty Ltd, a direct subsidiary of GoldlinQ Holdings Pty Ltd; and
- iii. GoldlinQ 3 Pty Ltd, an indirect subsidiary of GoldlinQ Holdings Pty Ltd.

In addition to these reporting entities, GoldlinQ Holdings Pty Ltd owns, controls and operates various subsidiary entities which are non-reporting entities for the Reporting Period.

2. Our structure, operations and supply chain – criteria 2 (section 16(1)(b) of the Act)

Our structure

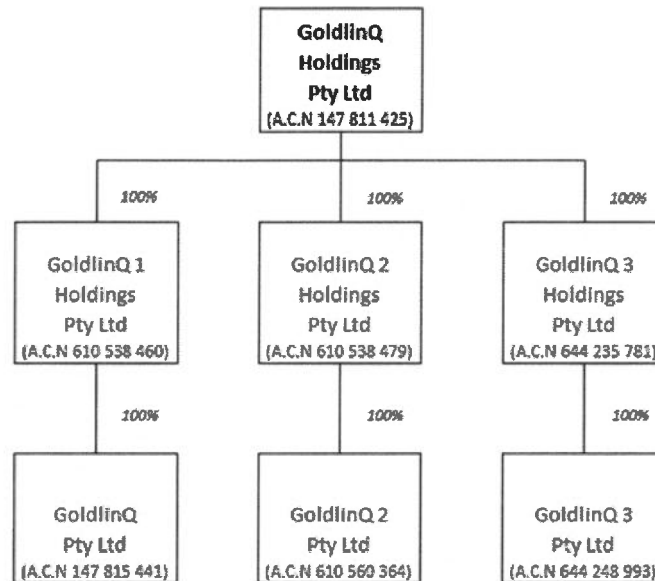
The following entities hold 100% of the equity in the GoldlinQ Group, in the following proportions:¹

- Marubeni GCLR2 Pty Ltd (30%);
- IPP (Aust) Ltd (30%);
- Pinnacle Fund Services Limited (as trustee for the Palisade's Australian Social Infrastructure Fund 1) and Pinnacle RE Services Limited (as trustee for the Palisade's Australian Social Infrastructure Fund 2) (18.75%);
- Plenary Investments (GoldlinQ) Pty Ltd and Plenary Investments (GoldlinQ) 2 Pty Ltd (11.25%); and
- Keolis Downer South Australia Pty Ltd (10%).

Figure 1 provides an overview of the GoldlinQ Group structure, and the GCLR Project structure.

¹ This breakdown is current as at the date of this Statement.

Figure 1 – GoldlinQ Group structure



Our Operations

GoldlinQ is entrusted with the delivery and operation of the transformative Gold Coast Light Rail. The Gold Coast Light Rail already successfully operates from Helensvale to Broadbeach (Stages 1 and 2) and is being extended to Burleigh (Stage 3). This city-shaping infrastructure is critical to the Gold Coast, one of Australia's fastest growing cities and leading tourism destinations, keeping pace with current public transport needs and continues moving forward.

Our local, expert team leads and oversees the GCLR Project, working on behalf of our government partners and alongside our operation and construction contractors, to ensure our city has one of the world's best light rail systems.

GoldlinQ's key functions and activities in relation to the GCLR Project can be grouped into the following four categories:

- project management;
- stakeholder management;
- finance management; and
- contract management.

Delivered through a public private partnership model, GoldlinQ is responsible for the finance, procurement, design, construction, operation and maintenance of the GCLR Project for the concession period of 18 years.

Key objectives of GoldlinQ include:

- being recognised as a leader in the industry in safety management and performance, and maintaining Rail Safety Accreditation;

- being recognised as an industry leader in the successful delivery and operation of a world-class light rail system;
- being recognised as a responsible member of the Gold Coast community, maintaining positive and productive relationships with key stakeholders, and demonstrating a commitment to environmental protection;
- achieving high standards of governance, accountability and compliance in response to legislative and contractual obligations; and
- fostering a culture of performance and continual improvement.

Our team

The GoldlinQ team (working for GoldlinQ and its controlled entities) is comprised of:

- 18 full time equivalent employees; and
- 1 part time employee,

(as at 31 December 2024), all of whom are based in Queensland, with most living on the Gold Coast. GoldlinQ also engaged two secondees, one of which holds a Temporary Skilled Shortage Visa, during the Reporting Period.

We have entered into individual employment contracts with each of our employees, which establish clear employment terms and conditions in compliance with applicable labour laws and regulations. During the recruitment process, comprehensive checks are conducted on prospective employees in compliance with all applicable laws and regulations.

Our Supply Chain

For the Reporting Period, GoldlinQ's supply chain can be broken into two distinct areas:

Procurement, Operations and Maintenance

The GoldlinQ Group has delivered and maintained highly specialised rail equipment and associated infrastructure through its Operations & Maintenance (**O&M**) Contractor, KDR Gold Coast Pty Ltd. KDR Gold Coast Pty Ltd also provides operations and maintenance services in respect of Stages 1 and 2 of the GCLR Project. GoldlinQ has also been negotiating the direct procurement of five new light rail vehicles (**LRVs**) as part of the Stage 3 extension through its LRV Supplier, Alstom Transport Australia Pty Ltd.

Design and Delivery of Stage 3 Expansion

Stage 3 of the GCLR Project, which commenced in June 2022, involves a southern extension of the GCLR system from Broadbeach south to Burleigh Heads. Stage 3 includes 6.7 kilometres of new dual-track light rail running from Broadbeach South Station to Burleigh Heads, eight new light rail stations and five additional LRVs. It will also include an upgrade and expansion of the existing depot and stabling facilities, a new light rail-bus interchange at Burleigh Heads and Miami and supporting works and improvements, including signalised traffic intersections and upgrades, new signalised pedestrian crossings and upgraded pedestrian and cycle facilities.

GoldlinQ primarily fulfils its design and delivery responsibilities through a series of subcontracting arrangements with the following entities:

- John Holland Pty Ltd as the Stage 3 Design & Construction (**D&C**) Contractor;
- KDR Gold Coast Pty Ltd as the O&M Subcontractor; and

- Alstom Transport Australia Pty Ltd as the LRV Supplier of the additional five LRVs required for Stage 3.

GoldlinQ 3 Pty Ltd has engaged KDR Gold Coast Pty Ltd as O&M Contractor to deliver the activities described above. As part of this supply chain, the O&M Contractor engages with a number of subcontractors, labour hire companies, and third-party suppliers to undertake its services. This supply chain is complicated and multifaceted, with specialised parts for the LRVs and the GCLR system being procured from multiple countries through extensive supply chains.

GoldlinQ has negotiated the procurement of LRVs from the LRV Supplier Alstom Transport Australia Pty Ltd as discussed above. Within this supply chain, the LRV Supplier engages with a complex network of third-party suppliers in its procurement of goods and services, which extend to suppliers in many jurisdictions.

While GoldlinQ's D&C Contractor, O&M Contractor and LRV Supplier are Australian entities with established corporate governance processes, their activities are underpinned by a series of complex supply chains with substantial inputs coming from entities based across many countries – creating challenges with oversight.

Further, aligned with GoldlinQ's contractual obligations to the State to support local industry, GoldlinQ has a number of other suppliers made up of primarily Australian entities who supply works, systems, and services (including consulting services) to support GoldlinQ in delivering the GCLR Project. In the Reporting Period, GoldlinQ had approximately 75 direct suppliers, which range in size from small family-owned businesses to large multinational corporations. These suppliers provide a range of services including administration, consultancy, software and the supply of goods required for the GCLR Project.

3. Modern slavery risks to GoldlinQ's operations and supply chain – Criteria 3 (section 16(1)(c) of the Act

Building on assessments carried out in previous Reporting Periods, GoldlinQ has continued to assess the risk of modern slavery practices in its operations and supply chains for the Reporting Period.

Our Operations

Australia has a low prevalence of modern slavery according to the Global Slavery Index 2023 (GSI). However, the Australian Human Rights Commission notes that there is an elevated risk of modern slavery in the construction and transportation industry. The greatest risks of modern slavery in GoldlinQ's operations arise from employment and procurement practices.

We have assessed the risk of GoldlinQ causing, contributing to or being directly linked to modern slavery through its employment practices as low. As described above, GoldlinQ's operations are largely located in Australia, with the majority of its employees employed via written common law contracts, in which GoldlinQ has sought to ensure that all legal entitlements are provided.

Our Supply Chain

We have assessed the risk of GoldlinQ causing, contributing to or being directly linked to modern slavery through its procurement practices as low. Checks are conducted during the procurement process, and comprehensive induction training is provided to all employees (including advising them

of our policies and their rights). However, as GoldlinQ operates in a sector with an elevated risk of modern slavery we will continue to monitor these risks in our supply chain and operations in order to continue to prevent, mitigate and account for these risks.

The key supply chain risks of modern slavery GoldlinQ has identified are in the supply chain underpinning the rail equipment required for the GCLR Project. This supply chain, which begins with the procurement of the LRVs and related rail equipment required for the operations and maintenance of the LRV fleet, is long, complex and, as described above, has substantial inputs from foreign entities. As the GCLR Project has progressed, GoldlinQ has continued to monitor its modern slavery risks and notes that during the Reporting Period, the vast majority of internationally sourced materials required for the GCLR Project have previously been procured and are on site in Australia. Accordingly, GoldlinQ considers that the risk of modern slavery practices in its supply chain during the Reporting Period have decreased when compared to the potential modern slavery risks in the longer supply chains during the procurement phase of Stage 3.

GoldlinQ recognises that the risk factors involved in its supply chain may vary, however, it considers the key modern slavery risks to be aware of as the GCLR Project progresses to be:

- using suppliers that operate in regions identified as having high levels of modern slavery;
- using suppliers that operate in sectors that are known for using vulnerable workers;
- using goods and services that are known to use labour exploitation;
- engaging suppliers who do not have well documented procurement policies; and
- engaging suppliers who have had modern slavery concerns or incidents previously.

As the majority of GoldlinQ's suppliers are in Australia, we consider the risk of modern slavery practices in our supply chain to be low, however, GoldlinQ will continue to monitor for these risks in our supply chain and operations as the GCLR Project progresses in order to continue to identify, manage and address these risks.

4. Actions taken to assess and address identified risks – criteria 4 (section 16(1)(d) of the Act

In the Reporting Period, GoldlinQ has taken the actions outlined in section 5 of this Statement to assist in assessing and addressing the modern slavery risks associated with its operations and supply chain.

In relation to GoldlinQ's operations, it has also continued to rely on adherence with its policies and procedures detailed in section 5 of this Statement to address GoldlinQ's risk (which is considered to be low) of causing, contributing to or being directly linked to modern slavery (based on its assessment described in section 3 above).

In relation to its supply chain, GoldlinQ has through the oversight of its Safety Risk Committee and monitoring of publications (as outlined in section 5) assessed its risk of causing, contributing to or being directly linked to modern slavery (as described in section 3) as low. This assessment is premised on the fact that the D&C Contractor, O&M Contractor and LVR Supplier are all large, reputable corporations and the D&C Contractor and the O&M Contractor are predominantly Australian based suppliers. Additionally, all three suppliers have published modern slavery statements under the Act. Where overseas suppliers are used, GoldlinQ recognises the modern slavery risks may increase and continues to strive to improve control measures to identify, manage and address these risks.

5. GoldlinQ's assessment of the effectiveness of its actions – criteria 5 (section 16(1)(e) of the Act

GoldlinQ is committed to identifying, managing and addressing risks of modern slavery practices in its operations and supply chains and seeks to continually improve on the effectiveness of its actions in this regard.

Current policies and procedures

GoldlinQ's existing policies and procedures set out the basis of GoldlinQ's expectations of its workers and suppliers to help mitigate modern slavery risks in its operations and supply chains.

Policy	Summary
GoldlinQ Procurement and Contract Management Policy	Provides guidance on acceptable procurement and contracting practices within GoldlinQ, including ethics and fairness in GoldlinQ's procurement and contracting processes
GoldlinQ Employee Handbook	Provides a reference guide about employment related processes and policies at GoldlinQ designed for use by our staff including employees' rights to address unlawful workplace discrimination, workplace harassment and bullying, and the inclusion of a grievance resolution process
GoldlinQ Code of Conduct	Provides GoldlinQ's expectations of its employees to conduct business activities with utmost honesty and integrity
Third Party Engagement Due Diligence Checklist	Requires that employees undertake due diligence by completing this checklist before engaging with a new community program partner, or new material supplier or contractor

Actions taken in 2024

GoldlinQ also implemented the following measures in 2024 to better identify, manage and address modern slavery risks:

Initiative	Action taken
Continued Safety Risk Committee oversight	In 2024, the Safety Risk Committee led by the Executive Director Safety & Risk continued to consider any modern slavery risks, including discussing the importance of identifying and appropriately responding to such risks. In 2024, no compliance issues were identified by the Safety Risk Committee.
Continue refining roadmap and strategy	GoldlinQ's refinement of its two year road map and strategy for identifying, managing and addressing modern slavery risks remains in progress, with the aim of better assisting GoldlinQ staff to practically implement the roadmap and strategy in 2025.
Monitoring of publications	GoldlinQ has continued to regularly monitor for any heightened risks associated with GoldlinQ's direct suppliers, the transport and construction sectors, and relevant countries

Initiative	Action taken
	<p>of origin through its monitoring system on a number of information platforms.</p> <p>This was implemented using a catch words based system to capture any correspondence or publication related to key risk areas. In 2024, the system did not identify any such publication that required further investigation.</p>
Onboarding training	GoldlinQ continued to deliver modern slavery training in its onboarding training modules for new employees in 2024.
Updating existing policies, procedures and plans	GoldlinQ finalised its review of its existing policies, procedures and plans to see if controls in these documents should be uplifted to better identify, prevent and address modern slavery risks. The relevant policies, procedures and plans were updated accordingly, and were implemented by GoldlinQ in the Reporting Period.
Contractual controls in new contracts	In negotiating and entering into any new third party agreements, GoldlinQ requested the inclusion of controls to identify, manage and address modern slavery risks, where possible.

GoldlinQ's focus during the 2024 reporting period was to implement the aforementioned initiatives. In order to assess the ongoing effectiveness of the initiatives, during 2025 GoldlinQ intends to develop further processes to review and improve these initiatives where appropriate to assist GoldlinQ to effectively identify, manage and address modern slavery risks in its operations and supply chain.

Actions planned for 2025

GoldlinQ understands that as we continue to grow, our influence over the sectors in which we conduct our operations will likely increase. As such, we have planned the following actions to uplift our controls to identify, manage and address modern slavery risks for the next reporting period:

Planned initiative	Description
Implement an updated road map and strategy	GoldlinQ intends to implement an updated road map and strategy for identifying, managing and addressing modern slavery risks, with the aim of better assisting GoldlinQ staff to practically implement the roadmap and strategy.
Improving auditing procedures	Continue the existing audit of GoldlinQ's direct suppliers by way of finalising the review of responses to the modern slavery compliance questionnaire and making relevant enquiries with the suppliers into their processes for identifying, managing and addressing modern slavery risks.

Planned initiative	Description
Introducing Purchase Orders	GoldlinQ intends to introduce the use of Purchase Orders when dealing with its suppliers. As part of preparing GoldlinQ's template Purchase Order, GoldlinQ will ensure that appropriate controls to identify, manage and address modern slavery risks are included in the standard terms and conditions for the Purchase Orders.

6. Consultation with GoldlinQ's non-reporting entities – criteria 6 (section 16(1)(f) of the Act

This Statement was prepared by GoldlinQ on behalf of the GoldlinQ Group entities. GoldlinQ did not consider that formal consultation with the other entities in the GoldlinQ Group was necessary in preparing this statement. Each of the entities have the same Board of Directors and employees of GoldlinQ are responsible for the management of the GoldlinQ Group entities. The GoldlinQ Group is treated as one operational entity from a corporate governance perspective and each GoldlinQ Group entity adheres to the policies and procedures described in this Statement.

7. Other relevant information – criteria 7 (section 16(1)(g) of the Act

Refer to the above criteria. Relevant additional information has been included within each criterion.

8. GoldlinQ's approval – criteria 8 (section 16(2)(b) of the Act

This Statement was approved by the board of GoldlinQ Holdings Pty Ltd on behalf of GoldlinQ Holdings Pty Ltd and the other reporting entities, GoldlinQ 3 Holdings Pty Ltd and GoldlinQ 3 Pty Ltd, on 24 June 2024 (please refer to page 1 of this Statement for the approval of John Witheriff, Director of GoldlinQ Holdings Pty Ltd).

