



Parklife Metro Modern Slavery Statement

FY Ending December 2024

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1 Introduction

1.1 What is modern slavery?

“Modern slavery” refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will.

Walk Free assesses that 49.6 million people were living in modern slavery in 2021, which is an increase of 10 million people in comparison to 2016.¹ In times of crisis (be it the COVID-19 pandemic, the growing climate crisis or ongoing armed conflict) the world’s most vulnerable people are hit hardest and fastest.²

1.2 Our vision

Parklife Metro aims to successfully deliver the Sydney Metro – Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) Project (the Project) in accordance with the Project Documents and in doing so be a key part of delivering an integrated transport system for the Western Parkland City. In achieving this goal Parklife Metro is committed to conducting its business with high levels of ethical and professional standards and is committed to recognising and respecting human rights.

Parklife Metro recognises that the nature of our business means there is a chance that we might be exposed to instances of modern slavery in our supply chains.

We are committed to ongoing engagement with our stakeholders to better collaborate in respecting human rights with a focus on continuous improvement. We are also committed to undertaking further work to identify and take steps to prevent modern slavery.

2 Reporting Entities

This joint statement covers:

- Parklife Metro Holdings Pty Ltd (ACN: 657 226 652) in its personal capacity and as trustee of the Parklife Metro Holdings Unit Trust;
- Parklife Metro Pty Ltd (ACN: 657 249 682) in its personal capacity and as trustee of the Parklife Metro Unit Trust (collectively “Parklife Metro”).

This joint Modern Slavery Statement covers the reporting period of 1 January 2024 to 31 December 2024 for all reporting entities.

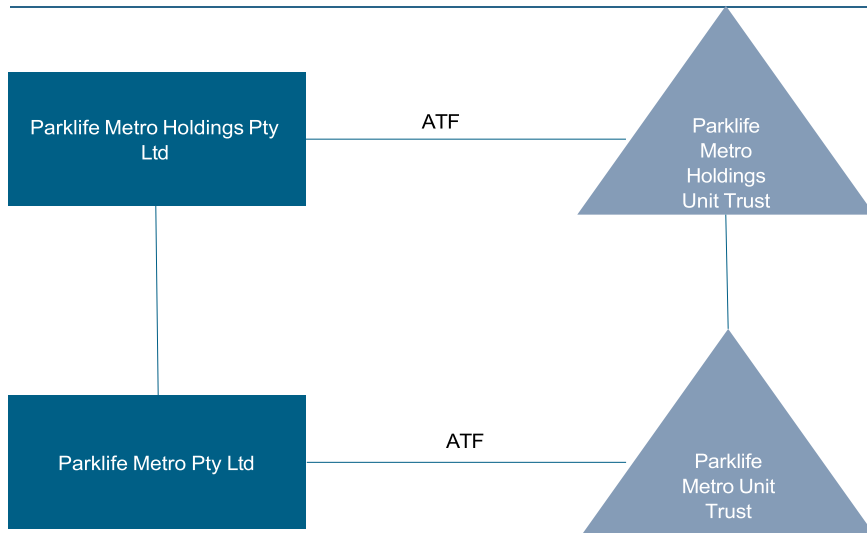
3 Our Structure, Operations and Supply Chains

3.1 Structure

Parklife Metro is a special purpose vehicle (SPV) incorporated specifically for the delivery of the SSTOM Project. The structure of the SPV is as follows.

¹ Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>

² *Ibid.*



The shareholders of Parklife Metro are Plenary, Siemens, Webuild and RATP. The management of Parklife Metro has been contracted to Plenary Asset Management Pty Ltd via a Management Services Deed for the period of the concession (15 years).

3.2 Operations

The Sydney Metro – Western Sydney Airport Project is being procured through five main packages:

- Advanced and Enabling Works (AEW), which includes the Footbridge St Marys (FSM)
- Station Box and Tunnelling (SBT) Works
- Surface Civil and Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance Package (SSTOM)
- Finalisation Auxiliary Works (FAW)

The Parklife Metro consortium has been contracted by Sydney Metro, as part of a Public Private Partnership (PPP), to deliver the Sydney Metro – Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) Project. Parklife Metro is responsible for the financing, design, construction, operation, maintenance and handback of the SSTOM Project, which includes delivery of six new metro stations, stabling and maintenance facilities, rolling stock and the operation and maintenance services for 15 years.

The scope of the SSTOM Project includes:

- acceptance and fit-out of the SBT Works and SCAW Works with rail infrastructure for the metro line;
- delivery of Project integration activities;
- six new metro stations (including precinct and transport integration works at selected stations);
- all stabling and maintenance facilities required to support the Train fleet, and an Operational Control Centre (OCC) to safely operate the system;
- local area works, including new precinct streets, street and intersection modifications, landscaping and provision of new and upgraded transport interchange infrastructure at selected locations;
- property works and utility services works;
- supply and commissioning of the Trains;

- operation and maintenance of Sydney Metro – Western Sydney Airport for the Term; and
- handback to Sydney Metro in an appropriate condition at the end of the Term.

Parklife Metro has a management team of approximately 17 people dedicated to the delivery and operations of the SSTOM Project.

Parklife Metro has entered into the SSTOM Project Deed with Sydney Metro. As is usual for a PPP project, Parklife Metro has passed down the core design, construction, operation and maintenance obligations of the Project to its key Consortium delivery partners (the **Core Contractors**). Parklife Metro has entered into the D&C Contract with Webuild S.p.A, Siemens Mobility GmbH, Siemens Mobility Austria GmbH and Siemens Mobility Pty Ltd who together form a joint venture (the **D&C Contractor**) and are responsible for the delivery activities to Parklife Metro. In addition to this, Parklife Metro has entered into a subcontract with RATP Dev WSA Pty Ltd (the **O&M Contractor**) who are responsible for the O&M activities on the Project. The SPV services have been subcontracted to Plenary Asset Management (the **SPV Manager**).

3.3 Supply Chains

Our major direct (tier 1) suppliers for FY 2024 were:

- Webuild S.p.A, Siemens Mobility GmbH, Siemens Mobility Austria GmbH and Siemens Mobility Pty Ltd who together form a joint venture and are considered an Australian supplier;
- RATP Dev WSA Pty Ltd; and
- Plenary Asset Management Pty Ltd.

In addition to the above major direct (tier 1) suppliers, we requested additional suppliers who provided services to Parklife Metro to complete a modern slavery questionnaire. 11 out of a total of 14 (78.6%) of the suppliers requested to participate, completed the questionnaire. The surveyed suppliers operate in the following sectors:

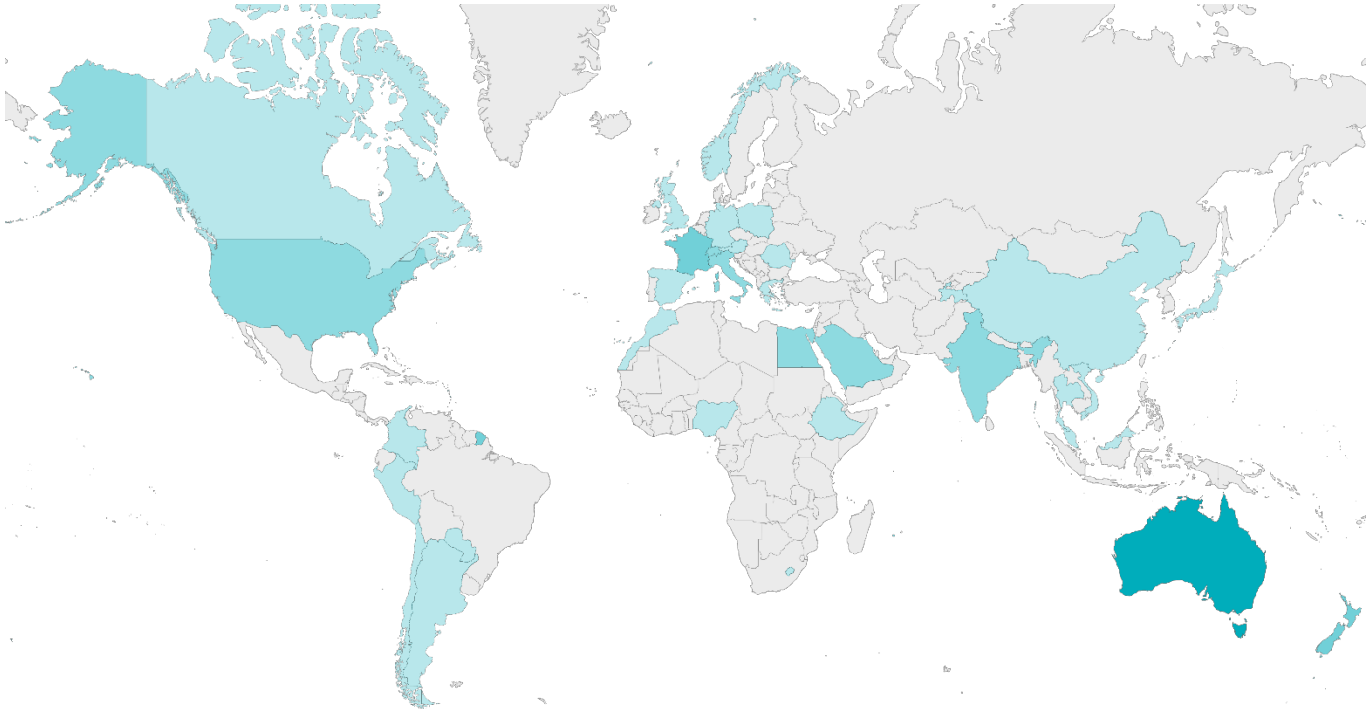
- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Labour hire

-
- Maintenance and Repair of motor vehicles
 - Manufacturing
 - Mining and Quarrying
 - Personal services
 - Professional and Scientific Services
 - Real estate
 - Retail
 - Security services
 - Transportation and Storage
 - Water supply, Sewerage and Waste Management
 - Wholesale

Our key suppliers operate in many locations in the world, including:

- Argentina
- Australia
- Austria
- Canada
- Chile
- China
- Colombia
- Egypt
- Ethiopia
- France
- Germany
- Greece
- Hong Kong
- India
- Italy
- Japan
- Lesotho
- Malaysia
- Morocco
- New Zealand
- Nigeria
- Norway

- Paraguay
- Peru
- Poland
- Romania
- Saudi Arabia
- Singapore
- Spain
- Switzerland
- Tajikistan
- Thailand
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Vietnam



4 Risk of Modern Slavery Practices in Our Operations and Supply Chains

As part of our analysis to consider the risk of modern slavery practices in our supply chains, we referred to resources

such as the Global Slavery Index 2023³, materials and information on risks of modern slavery produced by the International Labour Organization and the Property, Construction & Modern Slavery report⁴.

We also considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as the risk in the property and construction sector, business activities, labour force structure and social, political and environmental conditions in the countries in which we and our suppliers operate.

We used a third-party tool, the iPRO Modern Slavery Assessment Tool (iPro Tool), to assess modern slavery risks in our supply chain. We engaged iPRO during the reporting period to conduct a bulk assessment of our tier 1 suppliers.

4.1 Operations

Parklife Metro's operations in 2024 mainly concerned delivery activities relating to the SSTOM Project.

The D&C Contractor has been subcontracted to continue to undertake the delivery activities that started in 2023. The O&M Contractor has been subcontracted to undertake the O&M activities and are also active during the delivery phase, providing design input and mobilisation activities.

Parklife considers the risk of modern slavery across its operations to be relatively low, given the D&C Contractor and O&M Contractor comply with all relevant Australian legislation, which ensures a safe working environment for personnel engaged on the Project.

Parklife also used the iPro Tool to assess its own modern slavery risks as an SPV and the assessment supported that Parklife itself successfully controls any risk through adequate risk controls

4.2 Supply Chains

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward⁵.

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many assessed suppliers are in the corresponding sectors.

³ Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/map/>.

⁴ Property, Construction and Modern Slavery: Practical responses to managing risks to people, KPMG and Australian Human Rights Commission, 2020.

⁵ ILO and UNICEF, 2021.

Our Suppliers Operate in the following High-risk Sectors



Accommodation and Food Service Activities

1



Agriculture, Forestries, and Fishing

1



Construction

3



Maintenance and Repair of motor vehicles

1



Mining and Quarrying

2



Retail

1



Transportation and Storage

2



Wholesale

1

Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors



Agriculture, Forestries, and Fishing

1



Cleaning

1



Construction

4



Manufacturing

1



Mining and Quarrying

2



Transportation and Storage

2

Our Suppliers Source Goods and Services from the following High-risk Sectors



Accommodation and Food Service Activities

2



Building services contractor

1



Cleaning

4



Construction

2



Labour hire

2



Maintenance and Repair of motor vehicles

1



Manufacturing

3



Mining and Quarrying

1



Personal services

1



Retail

1



Security services

2



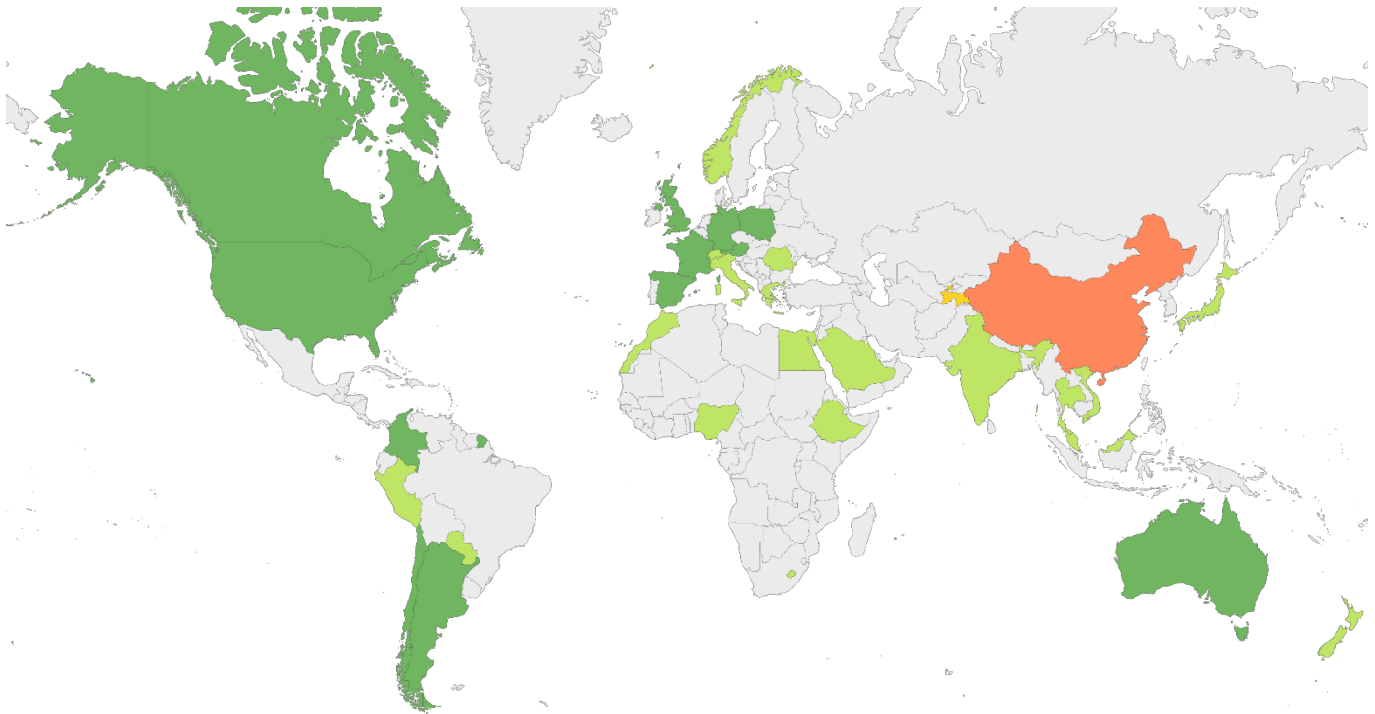
Transportation and Storage

3

³ *Property, Construction and Modern Slavery: Practical responses to managing risks to people*, KPMG and Australian Human Rights Commission, 2020.

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices.

The geographical regions where our selected tier 1 supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the Trafficking-in Persons Report, from Tier 1 (dark green) where minimum standards are met to tier 3 (orange) where governments are not yet making significant efforts to meet minimum standards⁶.



5 Actions Taken by Parklife Metro to Assess and Address Modern Slavery Risks

Assess

As set out above Parklife used a third-party tool, the iPRO Modern Slavery Assessment Tool, to assess modern slavery risks in our supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)

⁶ https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTIP_2022_web.pdf

- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

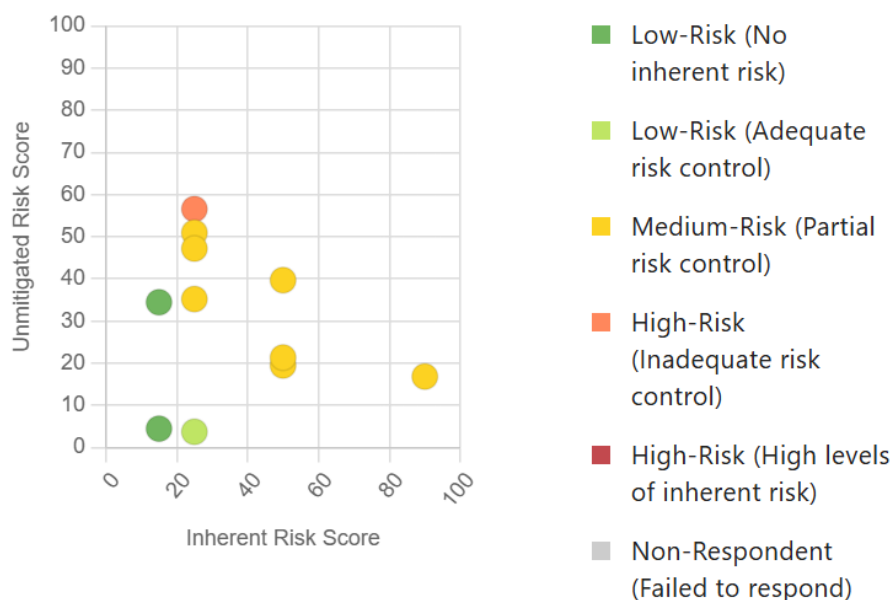
The self-assessment questionnaire completed by the selected suppliers allowed us to determine the appropriate risk category of the modern slavery risk for each supplier.

The Inherent Risk Score was determined by evaluating the risks inherent to a supplier's operations, production and sourcing. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

The Inherent Risk Scores and Unmitigated Risk Scores of the selected suppliers that responded to the iPro questionnaire are as follows:



Address

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment. Action items were also aggregated, giving Parklife a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

Parklife aims to continue working with its suppliers and the further supply chain to ensure continued awareness of risks of modern slavery and will check in with its supply chain to see whether any of the suggested action items from the assessment have or will be implemented in the future.

Remediation processes

The reporting entities are committed to investigating any report of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

In line with our vision and values we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains. We would work collaboratively with our suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, we would take steps to sever the connections to the offending supplier or sub-supplier.

6 Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

In 2024, we have assessed our key suppliers against two risk scores:

- Inherent Risk Score
- Unmitigated Risk Score

Parklife is provided with an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	35.91 / 100
Unmitigated Risk Score	30.00 / 100
Currently, on average, our suppliers have partial risk control.	

The Inherent Risk Score and Unmitigated Risk Score are both moderate. The Unmitigated Risk Score reflects that partial risk controls are in place in our supply chain and can be reduced when suppliers implement further actions reduce the unmitigated risk. As mentioned, Parklife is committed to actively engage with our supply chain on this.

7 Consultation

Parklife Metro’s structure is set out earlier in this Statement.

The relevant Parklife Metro entities are integrated and have the same Company Secretary. Their legal, finance and technical functions have all been involved in the preparation of this Modern Slavery Statement and have provided relevant information which is included in this Statement.

8 Additional Information

Parklife Metro is committed to working to improve its assessment and addressing of modern slavery risks and will continue to engage on awareness for modern slavery risks with current stakeholders during 2025.

This will allow Parklife Metro to better assess and address:

- further supply chain risks based on the findings from the previously implemented measures;
- engagement with suppliers on actions to further reduce their risk of incidences of modern slavery;
- the possibility of partnering with industry groups; and
- potential inclusion of modern slavery clauses in new contracts with relevant stakeholders to ensure Parklife Metro has sufficient leverage to influence stakeholders

9 Approval

This joint Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018 (Cth)*.

This statement was prepared by Parklife Metro Pty Ltd (as trustee of the Parklife Metro Unit Trust) and Parklife Metro Holdings Pty Ltd (as trustee of the Parklife Metro Holdings Unit Trust).

This statement has been approved by the Boards of Directors of both Parklife Metro Pty Ltd and Parklife Metro Holdings Pty Ltd.

Signed on behalf of Parklife Metro Pty Ltd (as trustee of the Parklife Metro Unit Trust) and Parklife Metro Holdings Pty Ltd (as trustee of the Parklife Metro Holdings Unit Trust).



Paul Oppenheim

Chair