



Modern Slavery Statement 2023

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 2023 to 31 December 2023 (**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 18 June 2024.


_____ (signed)

Name: John Witheriff

Position: Director

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 second 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.



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

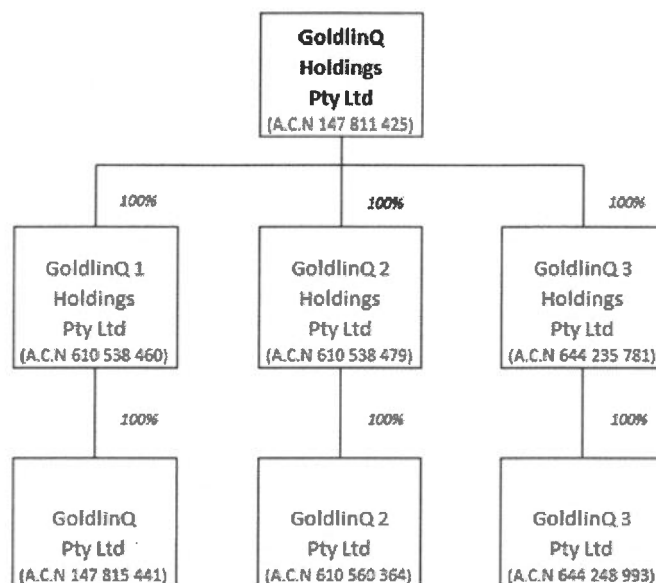
The following entities hold 100% of the equity in the GoldlinQ Group, in the following proportions:¹

- 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:

- 17 full time equivalent employees;
- 1 part time employee; and
- 2 secondees, one of which holds a Temporary Skilled Shortage Visa,

(as at 31 December 2023), all of whom are based in Queensland, with most living on the Gold Coast.

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

The \$1.2 billion 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.

GoldlinQ has engaged John Holland Pty Ltd for the design and delivery of Stage 3 works described above. While only early works focusing on design commenced during the Reporting Period, GoldlinQ expects as the level of activity increases, an extensive supply chain will be engaged by the D&C Contractor across construction, engineering, supply, manufacturing and labour hire sectors until the completion of Stage 3.

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

GoldlinQ has carried out an assessment in relation to 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 2018 (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. GoldlinQ notes that during the Reporting Period, its engagement with its D&C Contractor was in relation to early works focused mainly on design, thus the risk of modern slavery practices in its supply chain during the Reporting Period was low. However, we note that as the GCLR Project progresses, the risk of causing, contributing to or being directly linked to modern slavery in its engagement with the D&C Contractor, O&M Contractor and LRV Supplier will increase.

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 address identified risks – criteria 4 (section 16(1)(d) of the Act

In relation to GoldlinQ's operations, it has relied 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 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 LRV 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.

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 2023

Further to the planned initiatives set out in GoldlinQ's 2022 Modern Slavery Statement, GoldlinQ implemented the following measures in 2023 to better identify, manage and address modern slavery risks:

Initiative	Action taken
Establish a purpose-led working group	<p>In 2023, GoldlinQ tasked the Safety Risk Committee led by the Executive Director Safety & Risk to be responsible for:</p> <ul style="list-style-type: none"> • identifying modern slavery risks; • managing modern slavery risks; • addressing modern slavery risks; and • reporting on modern slavery risks, <p>within GoldlinQ's operations and supply chains.</p> <p>The Safety Risk Committee has a standing agenda item for modern slavery risks and provides regular updates to the Board. In 2023, no issues of compliance were identified.</p>
Create road map and strategy	GoldlinQ created and implemented a two year road map intended to uplift internal controls for identifying, managing and addressing modern slavery risks in GoldlinQ's operations

Initiative	Action taken
	and supply chains. This road map includes operational strategies to assist implementation and milestones to measure effectiveness.
Improving auditing procedures	An audit of completed modern slavery questionnaires completed by suppliers in 2023 was commenced, however, the fulsome review of responses is ongoing. It is intended that once this audit is completed it will inform the broader GoldlinQ assurance program that informs the Board papers required for GoldlinQ's Board to oversee GoldlinQ's strategy and its governance frameworks. This program assists GoldlinQ with fulfilling its commitment to identify, manage and address the risk of modern slavery practices in GoldlinQ's supply chain.
Monitoring of publications	<p>GoldlinQ has created a regular monitoring system on a number of information platforms to identify any heightened risks associated with GoldlinQ's direct suppliers, the transport and construction sectors, and relevant countries of origin.</p> <p>This was implemented using a catch words based system to capture any correspondence or publication related to key risk areas. In 2023, the system did not identify any such publication that required further investigation.</p>
Training and continuous improvement sessions	The Board and current GoldlinQ employees undertook modern slavery training through legal service provider Allens, with the training aimed at how to identify modern slavery risks, how to escalate those risks within GoldlinQ and how to report on any suspected modern slavery incidents. Additionally, GoldlinQ delivers modern slavery training in its onboarding training modules for new employees.
Creating and updating existing policies, procedures and plans	<p>GoldlinQ has created a specific Modern Slavery Policy to ensure GoldlinQ's commitment to identify, prevent and address modern slavery practices in its operations and supply chain is documented. It is intended that the Modern Slavery Policy will be approved by the Board and implemented in 2024.</p> <p>In 2023, GoldlinQ also commenced a review of its existing policies, procedures and plans to see if controls in these documents can be uplifted to better identify, prevent and address modern slavery risks. This review is expected to be finalised in 2024.</p>
Reviewing and updating contracts	GoldlinQ reviewed the terms and conditions of its standard form contract templates to ensure they reflect the required standards of professional conduct, responsible business

Initiative	Action taken
	<p>fundamentals and other relevant governance and operating standards. GoldlinQ updated a number of documents to uplift these controls, including updating the template services agreement to ensure third parties acknowledge and account for modern slavery risks.</p>
<p>Creating the Third Party Engagement Due Diligence Checklist</p>	<p>In 2023, GoldlinQ successfully implemented a Third Party Engagement Due Diligence Checklist. The intention of the checklist is to add further screening questions to establish details of the third party's modern slavery controls.</p> <p>GoldlinQ distributed this checklist to its major suppliers, with the aim of ensuring the supplier maintains a minimum level of controls. For example, engaging with its suppliers to ensure visibility over its supply chain and conducting modern slavery training with its staff.</p>

GoldlinQ's focus during the 2023 reporting period was to implement the aforementioned initiatives. In order to assess the ongoing effectiveness of the initiatives, during 2024 GoldlinQ intends to develop further processes for the audit and review of these initiatives to assist GoldlinQ to effectively identify, manage and address modern slavery risks in its operations and supply chain.

Actions planned for 2024

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
<p>Establish a purpose-led working group – improve procedures following identification of modern slavery risks</p>	<p>GoldlinQ intends to improve its procedure in the event the Safety Risk Committee identifies a risk that GoldlinQ may cause, contribute to or be directly linked with modern slavery.</p> <p>By implementing a procedure that sets out the clear next steps following the identification of such a risk, it is intended that this will allow GoldlinQ staff to quickly, appropriately and consistently respond in order to best address and manage any potential risks.</p>
<p>Continue developing and refining road map and strategy</p>	<p>GoldlinQ intends to develop and refine its 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.</p> <p>A proposed amendment to the road map is to establish a review committee (separate to the Safety Risk Committee). This will provide separation between the Safety Risk Committee, which identifies modern slavery risks in</p>

Planned initiative	Description
	GoldlinQ's operations and supply chain, and the committee that independently assesses the efficacy of the road map and strategy. It is intended that the review committee will be able to make recommendations to the Safety Risk Committee as necessary in order to improve the road map's implementation.
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.
Monitoring of publications – improve catch words	Continue to review and expand the list of applicable catch words to minimise the risk of relevant publications being overlooked.
Training and continuous improvement sessions	Provide employees with access to an online on-demand training module to allow them to refresh their understanding of how to identify, manage and address modern slavery risks within GoldlinQ's operations and supply chain.
Reviewing and updating contracts	Continuing to review new third party agreements for modern slavery considerations and where applicable, requesting that suppliers amend their contracts to ensure they contain controls to identify, manage and address modern slavery risks.
Updating the Third Party Engagement Due Diligence Checklist – confirmation of ongoing compliance	Following the successful implementation of the Third Party Engagement Due Diligence Checklist, GoldlinQ intends to test ongoing compliance by way of randomly selecting suppliers to complete an updated checklist.

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 18 June 2023 (please refer to page 1 of this Statement for the approval of John Witheriff, Director of GoldlinQ Holdings Pty Ltd).

