



Parklife Metro Modern Slavery Statement

FY Ending December 2023

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1 Introduction

1.1 What is modern slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. *The Modern Slavery Act 2018* (Cth) (“**the Modern Slavery Act**”) defines the different forms that modern slavery can take:

- slavery, servitude, forced marriage, forced labour, deceptive recruiting, debt bondage;
- organ trafficking, offences involving non-citizens working in Australia without the correct visa;
- trafficking in persons (the facilitation of movement of victims through coercion, threats or deception with the purpose of exploiting them);
- the worst forms of child labour (comprising all forms of slavery, child prostitution, the use of a child for illicit activities or work that is likely to harm the health, safety or morals of children).

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

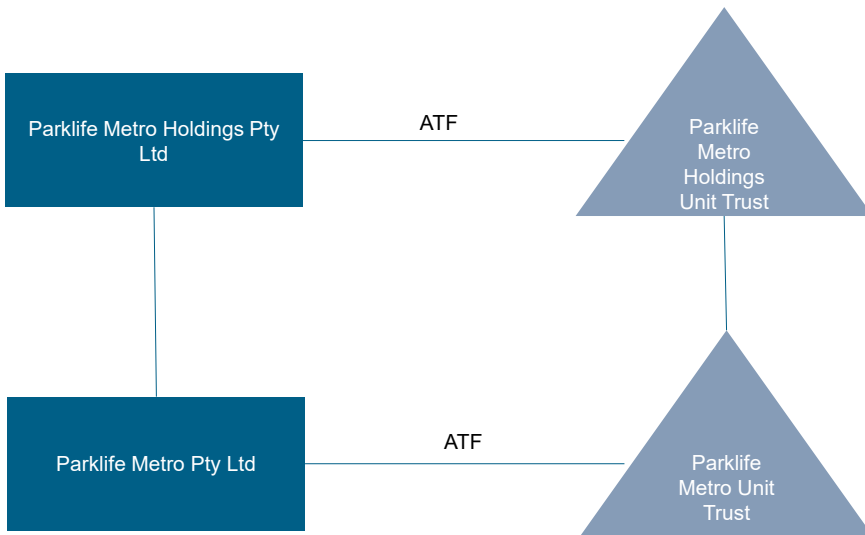
For the purposes of this joint Modern Slavery Statement the reporting entities are Parklife Metro Holdings Pty Ltd (ACN: 657 226 652) in its personal capacity and as trustee of the Parklife Metro Holdings Unit Trust and Parklife Metro Pty Ltd (ACN: 657 249 682) in its personal capacity and as trustee of the Parklife Metro Unit Trust (collectively “Parklife Metro”).

This Modern Slavery Statement covers Parklife Metro’s reporting period of 1 January 2023 to 31 December 2023.

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.



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.

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 16 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**).

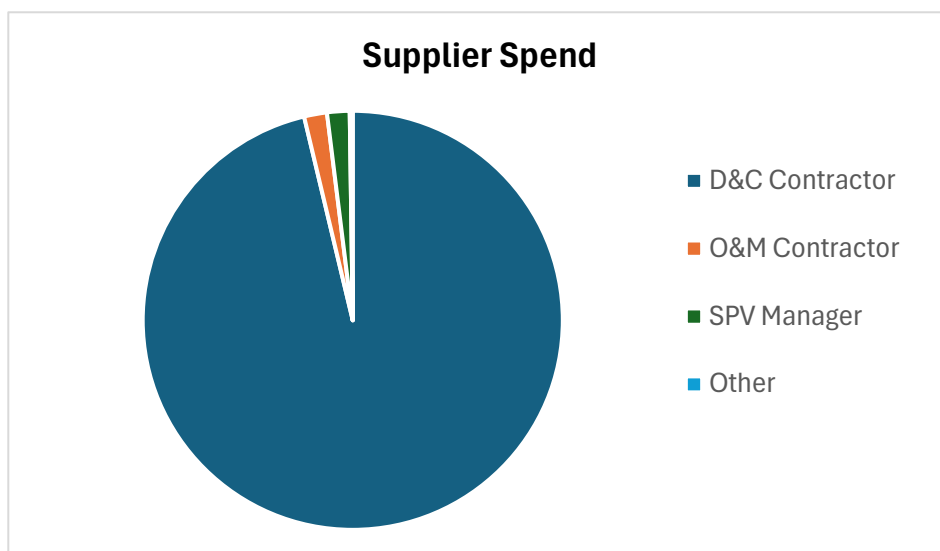
3.3 Supply Chains

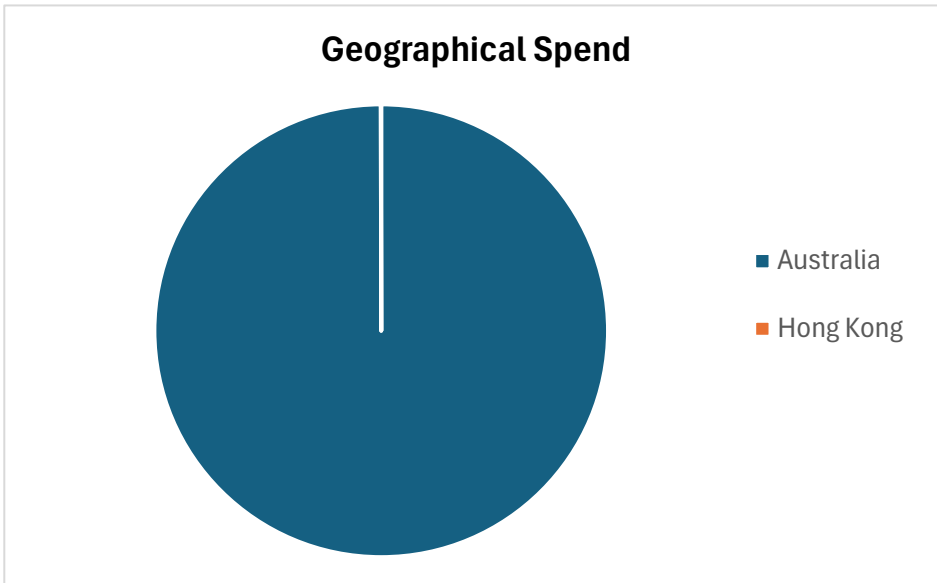
The key direct (tier 1) suppliers to Parklife Metro and therefore main areas for supplier spend in the 2023 Financial Year were:

- Subcontractors:
 - The D&C Contractor, which is considered an Australian supplier;
 - The O&M Contractor, headquartered in Australia; and
 - The SPV Manager, headquartered in Australia

As well as these key tier 1 suppliers, Parklife Metro also utilised other Professional Service Providers including expenses for auditors, the D&C independent certifier and Secured Creditors independent verifier, the CRS Estimator and other consultants and advisory costs (legal and technical).

In the 2023 Financial Year, Parklife Metro spent approximately \$570.3 million procuring goods and services with 22 vendors as represented below:





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

While conducting the analysis for our inaugural Modern Slavery Statement we referred to resources such as the Global Slavery Index 2023¹, the Property, Construction and Modern Slavery Report² and, materials and information on risks of modern slavery produced by the International Labour Organization.

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

We also asked our key tier 1 suppliers to complete a modern slavery questionnaire. In addition to the information obtained from the publicly available resources, the responses to the modern slavery questionnaire were helpful to further assess the risk of modern slavery practices in our operations and supply chains.

¹ Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/map/>.

² *Property, Construction and Modern Slavery: Practical responses to managing risks to people*, KPMG and Australian Human Rights Commission, 2020.

4.1 Operations

Parklife Metro's operations in 2023 mainly concerned delivery activities relating to the SSTOM Project.

The D&C Contractor has been subcontracted to undertake the delivery activities. 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 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.

4.2 Supply Chains

In preparing this statement we focused on our key suppliers with whom we have a direct contractual relationship (i.e. key tier 1 suppliers). However, we acknowledge that incidences of modern slavery can exist throughout supply chains at any level and we are committed to assessing and reporting risks further in our supply chain in future years and statements as part of our process for continuous improvement.

Our initial risk assessment consisted of a desktop review of our suppliers and provision of a modern slavery questionnaire to key tier 1 suppliers.

This assessment indicated that there are certain risk factors present in our supply chains which may increase the potential for risks of modern slavery practices occurring in them. The risk factors which we have identified in our supply chain are:

- Construction sector. This sector presents elevated risks of modern slavery as a result of factors such as potentially unsafe conditions, an increased demand for low-skilled labour, long and complex supply chains and tight project deadlines. Parklife Metro has subcontracted the delivery activities to the D&C Contractor, who in turn outsources part of the work, which increases the complexity of the supply chains and decreases the visibility of labour risks and impacts³. There is a risk that somewhere in these supply chains there might be instances or risks of modern slavery practices. With respect to Webuild and Siemens, the key operational risks identified within their businesses included:
 - Services performed by low skilled workers such as cleaning and manual labour, where minimum wages may not be paid or excessive or unreasonable hours are expected of a supplier's employees. This risk is considered low for the Project as the employees are largely professional workforce, or otherwise protected by enterprise agreements and Australian legislation.
 - Forced or compulsory labour, or child labour. These risks are generally more prevalent in certain regions. The D&C Contractor entities have very limited exposure to countries considered to be of high risk with respect to human rights.

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

- Services procurement (such as cleaning, site security and maintenance services). Although Parklife Metro recognises that these can be potential high risk areas, the bulk of these services are being procured from the O&M Contractor, who complies with applicable Australian laws. Parklife Metro seeks to ensure that the values and ethics of these contractors reflect those of Parklife Metro wherever possible.

Despite the existence of these risk factors in our supply chains with our direct suppliers, we are not aware of any reported instances of modern slavery which have occurred with any of our key tier 1 suppliers during the reporting period. The key tier 1 suppliers provided responses to our questionnaires and the majority must report on their practices and all have in place various processes to manage the risk of modern slavery practices.

As part of our continuous improvement program we are committed to further examining and assessing our supply chains. We recognise the potential for instances of modern slavery practices occurring further down our supply chains and we will strive to analyse and report on lower levels of our supply chains (i.e. beyond tier 1) in our next modern slavery statement.

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

5.1 Actions

In FY 2023 Parklife Metro has taken steps to assess and address the risks of modern slavery practices occurring in our operations and supply chains including:

- The adoption of a specific modern slavery policy which applies to and has been communicated to all directors and officers of Parklife Metro and which makes clear that Parklife Metro adopts a zero tolerance approach to all forms of modern slavery.
- The mapping of our supply chain, initially at tier 1 level, and assessment of the risk factors present in those supply chains. The compliance, risk, legal and finance teams worked together to conduct a desktop analysis of available information in order to conduct an initial analysis of our supply chains.
- The preparation of a modern slavery questionnaire that was rolled out to key tier 1 suppliers and contractors to assist in assessing modern slavery risk factors. The questionnaire contained various questions, the answers to which helped us assess the risks of modern slavery occurring in our supply chains. For example, the questionnaire included questions about and requests information on:
 - whether the supplier is required to report under existing modern slavery legislation;
 - whether the supplier has a written policy, procedure or value statement in relation to modern slavery, human rights or ethical trading risks and the impact on their business;
 - whether the organisation is a signatory to, or a member of any modern slavery initiative or charter;
 - the extent to which work is outsourced;
 - how the supplier conducts due diligence for modern slavery risk;
 - whether there have been any concerns in relation to modern slavery in their business or supply chains; and
 - whether the organisation or its agents/subcontractors have been investigated or charged with breaches of legislation relating to modern slavery.

The following key points were noted as part of the responses to our modern slavery questionnaires:

- Both the organisations constituting the D&C Contractor (Webuild and Siemens) are required to report under the existing Modern Slavery legislation and both have written policies and procedures in place that govern how they assess and manage modern slavery, human rights and ethical trading risks. The Modern Slavery Statements of both organisations were also reviewed and have factored into Parklife Metro's assessment.
- The O&M Contractor entity is currently not required to report under the existing Modern Slavery legislation as it is a newly established entity and the Project is not yet in Operations Phase. In due course, Parklife Metro expects that the O&M Contractor will be required to report. The O&M Contractor's major subcontractor relating to maintenance is Siemens (which is a reporting entity as noted above).
- The SPV manager performs all management services and staff are employed by a related body corporate that forms part of the same group (Plenary Group). The SPV manager's ultimate holding company is a reporting entity under the Modern Slavery Act and publishes an annual Modern Slavery Statement. This Statement has been reviewed by Parklife Metro and no risks of potential incidences of modern slavery were identified to date.

5.2 Remediation Processes

Parklife Metro is committed to investigating any reports 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.

Parklife Metro would work collaboratively with its suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, Parklife Metro would take steps to sever its connections to the offending supplier or sub-supplier.

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

Parklife Metro will review its modern slavery policy and modern slavery questionnaire in its next reporting period (and on an annual basis) to ensure that they remain accurate, up to date and effective.

Parklife Metro aims to set up processes to discuss and review engagement and feedback between key areas of its business in relation to modern slavery.

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 as such is committed to implementing the following measures in FY 2024:

- The provision of business-wide modern slavery awareness training which will stress the importance of assessing modern slavery risks when conducting our business;
- communication and engagement with current stakeholders on our modern slavery policy;
- the roll out of our modern slavery questionnaire to suppliers beyond the main tier 1 level.

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



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Signed for and on behalf of Parklife Metro Unit Trust

Paul Oppenheim, Chair, Parklife Metro Pty Ltd



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Signed for and on behalf of Parklife Metro Holdings Unit Trust

Paul Oppenheim, Chair, Parklife Metro Holdings Pty Ltd