



Modern Slavery Statement 2022

Modern Slavery Statement

This joint Modern Slavery Statement (**Statement**) has been prepared by GoldlinQ Holdings Pty Ltd in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) for the period from 1 January 2022 to 31 December 2022 (**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 20 June 2023.



(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 first Modern Slavery Statement. It outlines our approach to identify, manage and address 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

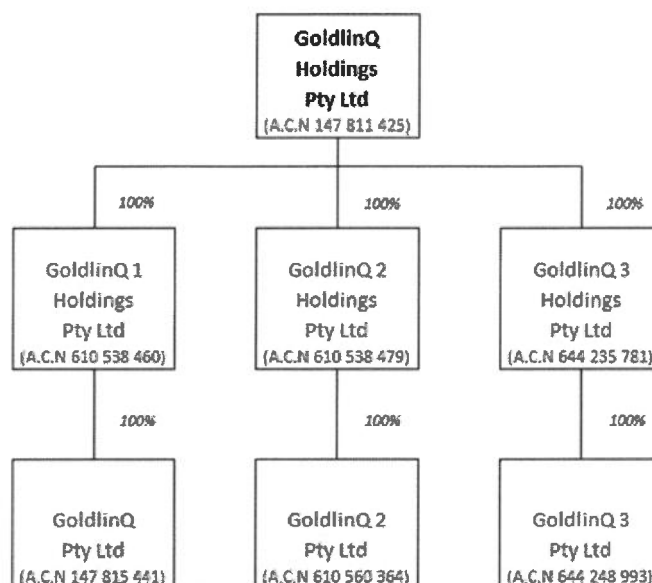
The following entities hold 100% of the equity in the GoldlinQ Group, in the following proportions:¹

- Marubeni GCLR2 Pty Ltd (30%);
- IPP (Aust) Pty Ltd (30%);
- Palisade's Australian Social Infrastructure Fund (PASIF) (18.75%);
- Plenary Investments (QSP) 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:

- 14 full time equivalent employees;
- 1 casual employee; and
- 1 secondee who holds a Temporary Skilled Shortage Visa;

(as at 31 December 2022), 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 46 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 exposure to potential risks associated with 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 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 exposure to modern slavery practices (based on its assessment described in section 3 above).

In relation to its supply chain, GoldlinQ has assessed its potential exposure to modern slavery practices 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 planned for 2023

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
Establish a purpose-led working group	Task persons representing a cross section of the business to be responsible for: <ul style="list-style-type: none">• identifying modern slavery risks;• managing modern slavery risks;• addressing modern slavery risks; and• reporting on modern slavery risks, within GoldlinQ's operations and supply chains
Create road map and strategy	Plan out and document a two year road map to uplift our controls for identifying, managing and addressing any modern slavery risks in GoldlinQ's operations and supply chains, which includes an operational strategy with milestones to measure effectiveness
Improving auditing procedures	Robust auditing procedures for GoldlinQ's direct suppliers will be integrated into the broader GoldlinQ assurance program. This program informs the Board papers required for GoldlinQ's Board to oversee GoldlinQ's strategy and its governance frameworks, which are intended to assist

Planned initiative	Description
	GoldlinQ with fulfilling its commitment to identify, manage and address the risk of modern slavery practices in GoldlinQ's supply chain.
Monitoring of publications	Set up a regular monitoring system on a number of information platforms to identify any heightened risks associated with our direct suppliers, the transport and construction sectors, and relevant countries of origin. This will allow GoldlinQ to conduct its own investigations if it becomes aware of the need to do so.
Training and continuous improvement sessions	Investigate and decide on a training delivery model to inform GoldlinQ employees. The training will be designed to train employees on how to identify modern slavery risks, how to escalate those risks within GoldlinQ and how to report on any suspected modern slavery incidents.
Creating and updating existing policies, procedures and plans	Create a specific Modern Slavery Policy and update existing policies, procedures and plans to ensure GoldlinQ's commitment to identify, prevent and address modern slavery practices in its operations and supply chain is included where applicable.
Reviewing and updating contracts	Review the terms and conditions of GoldlinQ's contracts to ensure they continue to meet GoldlinQ's standards of professional conduct, responsible business fundamentals and other relevant governance and operating standards and where they do not meet the standards, ensure they are updated accordingly.
Updating the Third Party Engagement Due Diligence Checklist	Update the Third Party Engagement Due Diligence Checklist to add further screening questions that requests details of the third party's modern slavery controls. Based on the responses, GoldlinQ will collaborate with the major suppliers with the aim of ensuring a minimum level of controls are implemented.

Further, the following governance process has been identified as the appropriate process for ensuring the GoldlinQ board has oversight of GoldlinQ's modern slavery risk, compliance and reporting obligations.

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

