

Commission of Inquiry into the CFMEU

and Misconduct in the Construction Industry

Supplementary Bundle - Watson SC Report

31 JULY 2026

BUNDLE

Patrick Wheelahan KC and Shannon Jenkins

This is a supplementary tender bundle for **Geoffrey Watson SC** for **Week 13 – 31 July 2026** of the Commission of Inquiry into the CFMEU and Misconduct in the Construction Industry.

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https://www.linkedin.com/posts/m1tl_were-excited-to-announce-that-m1-traffic-activity-7425425982502645760-84pt?utm_source=share&utm_medium=member_desktop&rcm=ACoAAyfSGEBT5bAlacgdIGb8KksMXrYmWSHHZA



M1 Traffic & Labour

933 followers

2w • 🌐

+ Follow ...

We're excited to announce that M1 Traffic Control is expanding into Queensland.

Our new depot strengthens our ability to deliver the same high standard of safety, reliability, and responsive service that our clients trust across every project. With boots on the ground and equipment ready to go, we're prepared to support jobs of all sizes across the region.

This expansion will be led by our General Manager, Jordan, ensuring every site operates with the professionalism, efficiency, and safety-first approach M1 is known for.

Queensland — we're ready when you are 🌟

You can contact us via Jordan at; [REDACTED]



🌐 25

3 comments · 2 reposts

https://www.linkedin.com/posts/jordan-paragalli-548337242_m1-traffic-control-qld-pty-ltd-now-licensed-activity-742255037164306433-UO32?utm_source=share&utm_medium=member_desktop&rcm=ACoAAyfsGEBT5bAlacgdIGb8KksMXrYmWSHHZA



Jordan Paragalli • 3rd+
Director - M1 Traffic & Labour (QLD)
4w • Edited •

[+ Follow](#) ...

M1 Traffic Control QLD Pty Ltd – Now Licensed in Queensland

We're proud to announce that M1 Traffic Control QLD Pty Ltd is now officially licensed to operate across the state of Queensland.

This registration marks a major step in our continued growth and allows us to deliver compliant, high-quality traffic management services.

To kick things off in QLD, we'll be operating based in Molendinar from a shared office alongside our trusted suppliers [Mr Traffic Hire](#), big thank you to [Jamie Haitas](#) and co. Further strengthening collaboration, efficiency, and service delivery from day one.

M1 has always been built on strong foundations — family owned, business driven — and that approach continues to guide us as we expand into new regions while keeping our standards, culture, and relationships front and centre.

Queensland, we're ready.
Let's get to work.

(Traffic Management Registration Scheme (TMRS) - Department of Transport and Main Roads
Registration Number: 0437)



70

6 comments • 4 reposts

Like

Comment

Repost

Send

https://www.linkedin.com/posts/jordan-paragalli-548337242_were-excited-to-announce-that-m1-traffic-activity-7425436200930406401-Qh_7?utm_source=share&utm_medium=member_desktop&rcm=ACoAAyfsGEBT5bAlacgdIGb8KksMXrYmWSHHZA



Jordan Paragalli • 3rd+
Director - M1 Traffic & Labour (QLD)
2w • Edited •

+ Follow ...

We're proud to announce that M1 Traffic Control QLD Pty Ltd is now open for business across the South East Coast — strengthening our footprint and bringing our trusted traffic management solutions to even more projects and partners. We are still family owned and business orientated.

This growth isn't just about geography — it's about all the effort and hard work that lead to it. It will provide us opportunity, local jobs, stronger client support, and raising the standard of safety and service wherever we operate.

We would like to thank our trusted supplier [Mr Traffic Hire / Jamie Haitas](#) for their hospitality at their depot in Molendinar.

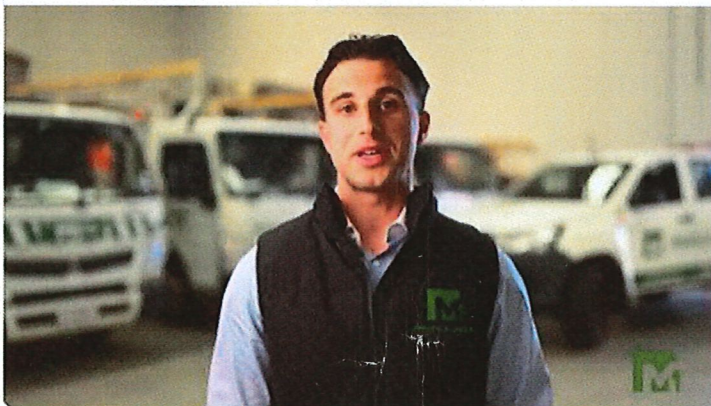
The coast is calling — and we're ready to get to work.



M1 Traffic & Labour
934 followers
2w •

+ Follow

We're excited to announce that M1 Traffic Control is expanding into Queensland. ...more



52

7 comments

Like

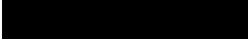
Comment

Repost

Send

Contract - DOT43093

Contract Details

Status	Expired
Public Body	Department of Transport and Planning (DTP)
Contract Number	DOT43093
Title	Traffic management services
Type	Purchases of Goods/Services
Description	Traffic management services
UNSPSC	Traffic control
Total Value of the Contract	\$495,270.47 (Fixed)
Starting Date	16 Feb 2026
Expiry Date	30 June 2026
Contact Person 	Dan Morris
	 
	 Office: 

Supplier Information

1	M1 Traffic and Labour
	ABN 43659173574

Contract - 2066

Contract Details

Status	Expired
Public Body	Goulburn-Murray Water
Contract Number	2066
Title	Field Based Labour Hire Services
Type	Purchases of Goods/Services
Description	Panel 2066 will support Goulburn Murray Water's (GMW) ongoing need for the hire of field based contract labour across the region to support its operational maintenance needs and specific infrastructure projects.
Associated with Tender	Field Based Labour Hire Services (RFT 2066)
UNSPSC	Recruitment services
Procurement Method	Public Tender
Total Value of the Contract	\$1,600,000.00 (Estimate)
Starting Date	16 June 2023
Expiry Date	15 June 2026
Number of Submissions	16
Contact Person	Lisa Milenkovic
	

Supplier Information

1	APG Workforce ACN 126135144 ABN 24135632235
2	Chandler Macleod ABN 33090555052 ACN 090555052
3	Collar Group ACN 624279009 ABN 16624279009

4 **Fetch Personnel Pty Ltd**
 ABN 32620155786

5 **Fox Personnel Pty Ltd**
 ACN 152369483
 ABN 39152369483

6 **Labourpower Trade**
 ABN 29624400988
 ACN 624400988

7 **M1 Traffic and Labour**
 ABN 43659173574

8 **Monarch Personnel**
 ACN 088323273
 ABN 65088323273

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Current details for ABN 43 659 173 574

ABN details

Entity name:	M1 TRAFFIC CONTROL GOULBURN VALLEY PTY LTD
ABN status:	Active from 04 May 2022
Entity type:	Australian Private Company
Goods & Services Tax (GST):	Registered from 04 May 2022
Main business location:	VIC 3042

Business name(s)

A business name is the registered name a business operates under. Businesses need to register their business name on the national Business Names Register if the business operates with a different name to their own. To learn more visit the [ASIC Website](#).

Business name	From
M1 TRAFFIC & LABOUR SERVICES GOULBURN VALLEY ↗	04 May 2022

ASIC registration - ACN or ARBN or ARSN or ARFN

659 173 574 [View record on the ASIC website](#) [↗](#)

Deductible gift recipient status

Not entitled to receive tax deductible gifts

ABN last updated: 04 May 2022

Record extracted: 28 Jul 2026

Disclaimer

The Registrar makes every reasonable effort to maintain current and accurate information on this site. The Commissioner of Taxation advises that if you use ABN Lookup for information about another entity for taxation purposes and that information turns out to be incorrect, in certain circumstances you will be protected from liability. For more information see [disclaimer](#).

Warning Statement

If you use ABN Lookup for information about a person or entity that provides financial or investment products or advice, make sure they have an Australian Financial Services (AFS) licence. You can check licenced professional registers [here](#).

Extracted Entries from Transport Victoria Accredited Traffic Management Companies List

Full excel spreadsheet available at: <https://transport.vic.gov.au/road-and-active-transport/business-and-industry/temporary-traffic-management/accreditation-program/accredited-traffic-management-companies>

Trading Name	Email	Road Categories (TMD)	Road Categories (TMI)
M1 Traffic Control Greater Bendigo		None	1
M1 Traffic Control Geelong Pty Ltd		None	1
M1 TRAFFIC CONTROL METRO PTY LTD		None	1, 2, 3
M1 Traffic Control Pty Ltd		1, 2, 3	1, 2, 3
M1 Traffic and Labour Services Goulburn Valley		None	1, 2, 3

ASIC Data Extracted 28/07/2026 at 10:39

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 681 048 895 M1 TRAFFIC CONTROL GREATER BENDIGO PTY LTD -

ACN (Australian Company Number):	681 048 895	Document No.
ABN:	52 681 048 895	
Current Name:	M1 TRAFFIC CONTROL GREATER BENDIGO PTY LTD	
Registered in:	Victoria	
Registration Date:	25/09/2024	
Review Date:	25/09/2026	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 TRAFFIC CONTROL GREATER BENDIGO PTY LTD
Name Start Date:	25/09/2024
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -**- Registered Office**

4EAD22410

Address:	
Start Date:	25/09/2024

- Principal Place of Business

4EAD22410

Address:	
Start Date:	25/09/2024

- Company Officers -**Note:**

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

[Director](#)

Name: TONY PARAGALLI 6EKG5764
Address: [REDACTED]
Birth Details: [REDACTED] MELBOURNE VIC
Appointment Date: 25/09/2024
Cease Date:

Secretary

Name: TONY PARAGALLI 6EKG5764
Address: [REDACTED]
Birth Details: [REDACTED] 7 MELBOURNE VIC
Appointment Date: 25/09/2024
Cease Date:

- Share Structure -

Current

Class: ORDINARY 4EAD22410
Number of Shares Issued: 80
Total Amount Paid / Taken to be Paid: \$80.00
Total Amount Due and Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	40	4EAD22410
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name: M1 JOINT VENTURES PTY LTD
ACN: 655 692 603
Address: [REDACTED]
Joint Holding: No

Abn: 51 655 692 603

- Holding -

Class:	ORD	Number Held:	40	4EAD22410
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	M1 NORTHERN VICTORIA PTY LTD
ACN:	658 640 414
Address:	
Joint Holding:	No
Abn:	16 658 640 414

- External Administration Documents -

[There are no external administration documents held for this organisation.](#)

- Charges -

[There are no charges held for this organisation.](#)

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced. At that time ASIC transferred all details of current charges to the PPS Registrar. ASIC can only provide details of satisfied charges prior to that date. Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au. InfoTrack may cap documents for on-file searches to 250.

- Document List -

Notes:

- * Documents already listed under Registered Charges are not repeated here.
- * Data from Documents with no Date Processed are not included in this Extract.
- * Documents with '0' pages have not yet been imaged and are not available via DOCIMAGE. Imaging takes approximately 2 weeks from date of lodgement.
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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	29/09/2025	29/09/2025	2	29/09/2025	6EKG5764
484A1	Change to Company Details Change Officeholder Name Or Address				
484	16/12/2024	16/12/2024	2	11/12/2024	6EILV3480
484A1	Change to Company Details Change Officeholder Name Or Address				
201	25/09/2024	25/09/2024	3	25/09/2024	4EAD22410

- Company Contact Addresses -**- Contact Address for ASIC use only****Address:** C/- M & T PARTNERS PTY LTD [REDACTED]**Start Date:** 17/10/2024

*** End of Document ***

ASIC Data Extracted 28/07/2026 at 10:39

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 661 080 431 M1 TRAFFIC CONTROL GEELONG PTY LTD -

ACN (Australian Company Number):	661 080 431	Document No.
ABN:	93 661 080 431	
Current Name:	M1 TRAFFIC CONTROL GEELONG PTY LTD	
Registered in:	Victoria	
Registration Date:	19/07/2022	
Review Date:	19/07/2027	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 TRAFFIC CONTROL GEELONG PTY LTD
Name Start Date:	19/07/2022
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -**- Registered Office** 4EAB70715

Address:	
Start Date:	19/07/2022

- Principal Place of Business 7EBV74671

Address:	
Start Date:	01/08/2022

- Previous Principal Place of Business 4EAB70715

Address:	
Start Date:	19/07/2022
Cease Date:	31/07/2022

- Company Officers -**Note:**

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the

appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

Director

Name:	ADAM CONTESSA	7EBV74671
Address:	[REDACTED]	
Birth Details:	[REDACTED] MELBOURNE VIC	
Appointment Date:	01/08/2022	
Cease Date:		

Previous Director

Name:	MICHAEL GAETANO PORTIA	4EAB70715
Address:	[REDACTED]	
Birth Details:	[REDACTED] KYABRAM VIC	
Appointment Date:	19/07/2022	
Cease Date:	01/08/2022	

Secretary

Name:	ADAM CONTESSA	7EBV74671
Address:	[REDACTED]	
Birth Details:	[REDACTED] MELBOURNE VIC	
Appointment Date:	01/08/2022	
Cease Date:		

Previous Secretary

Name:	MICHAEL GAETANO PORTIA	4EAB70715
Address:	[REDACTED]	
Birth Details:	[REDACTED] KYABRAM VIC	
Appointment Date:	19/07/2022	
Cease Date:	01/08/2022	

- Share Structure -

Current

Class:	ORDINARY	7EBV74671
Number of Shares Issued:	100	

Total Amount Paid /
Taken to be Paid: \$100.00
Total Amount Due and
Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	70	4EAB70715
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	M1 JOINT VENTURES PTY LTD
ACN:	655 692 603
Address:	
Joint Holding:	No
Abn:	51 655 692 603

- Holding -

Class:	ORD	Number Held:	30	7EBV74671
Beneficially Owned:	No	Fully Paid:	Yes	

- Members -

Name:	CONTESSA TRAFFIC AND LABOUR PTY LTD
ACN:	661 551 328
Address:	
Joint Holding:	No

- External Administration Documents -

There are no external administration documents held for this organisation.

- Charges -

There are no charges held for this organisation.

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced.
 At that time ASIC transferred all details of current charges to the PPS Registrar.
 ASIC can only provide details of satisfied charges prior to that date.
 Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au.
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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	25/08/2022	25/08/2022	2	25/08/2022	7EBV74770
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	25/08/2022	25/08/2022	3	25/08/2022	7EBV74671
484	Change to Company Details				
484C	Change of Principal Place of Business (Address)				
484E	Appointment or Cessation of a Company Officeholder				
484O	Changes to Share Structure				
484G	Notification of Share Issue				
484N	Changes to (Members) Share Holdings				
201	19/07/2022	19/07/2022	3	19/07/2022	4EAB70715
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: C/- M & T PARTNERS PTY LTD [REDACTED]
Start Date: 25/08/2022

*** End of Document ***

Current & Historical Organisation Extract

ASIC Data Extracted 28/07/2026 at 10:39

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 666 812 559 M1 TRAFFIC CONTROL METRO PTY LTD -

ACN (Australian Company Number):	666 812 559	Document No.
ABN:	14 666 812 559	
Current Name:	M1 TRAFFIC CONTROL METRO PTY LTD	
Registered in:	Victoria	
Registration Date:	27/03/2023	
Review Date:	27/03/2027	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 TRAFFIC CONTROL METRO PTY LTD
Name Start Date:	27/03/2023
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -

- Registered Office		6EIYR4219
Address:	C/- M & T PARTNERS PTY LTD [REDACTED]	
Start Date:	24/03/2025	
- Previous Registered Office		4EAC08913
Address:	[REDACTED]	
Start Date:	27/03/2023	
Cease Date:	23/03/2025	
- Principal Place of Business		4EAC08913
Address:	[REDACTED]	
Start Date:	27/03/2023	

- Company Officers -

Note:

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the

appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

Director

Name:	JORDAN DAVID PARAGALLI	6EJEI4962
Address:	[REDACTED]	
Birth Details:	[REDACTED] MELBOURNE VIC	
Appointment Date:	27/03/2025	
Cease Date:		

Previous Director

Name:	MICHAEL GAETANO PORTIA	4EAC08913
Address:	[REDACTED]	
Birth Details:	[REDACTED] KYABRAM VIC	
Appointment Date:	27/03/2023	
Cease Date:	27/03/2025	

Secretary

Name:	JORDAN DAVID PARAGALLI	6EJEI4962
Address:	[REDACTED]	
Birth Details:	[REDACTED] MELBOURNE VIC	
Appointment Date:	27/03/2025	
Cease Date:		

Previous Secretary

Name:	MICHAEL GAETANO PORTIA	4EAC08913
Address:	[REDACTED]	
Birth Details:	[REDACTED] KYABRAM VIC	
Appointment Date:	27/03/2023	
Cease Date:	27/03/2025	

- Share Structure -

Current

Class:	ORDINARY	4EAC08913
Number of Shares Issued:	100	

Total Amount Paid /
Taken to be Paid: \$100.00
Total Amount Due and
Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	100	4EAC08913
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	M1 JOINT VENTURES PTY LTD
ACN:	655 692 603
Address:	
Joint Holding:	No
Abn:	51 655 692 603

- External Administration Documents -

There are no external administration documents held for this organisation.

- Charges -

There are no charges held for this organisation.

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced.

At that time ASIC transferred all details of current charges to the PPS Registrar.

ASIC can only provide details of satisfied charges prior to that date.

Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au.

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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	22/04/2025	22/04/2025	2	22/04/2025	6EJEI4962
484A1	Change to Company Details Change Officeholder Name Or Address				
484	04/04/2025	04/04/2025	2	03/04/2025	6EJBN5597
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	17/03/2025	17/03/2025	2	17/03/2025	6EIYR4219
484B	Change to Company Details Change of Registered Address				
201	27/03/2023	27/03/2023	3	27/03/2023	4EAC08913
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: C/- M & T PARTNERS PTY LTD

Start Date: 17/03/2025

*** End of Document ***

Current & Historical Organisation Extract

ASIC Data Extracted 28/07/2026 at 10:39

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 659 173 574 M1 TRAFFIC CONTROL GOULBURN VALLEY PTY LTD -

ACN (Australian Company Number):	659 173 574	Document No.
ABN:	43 659 173 574	
Current Name:	M1 TRAFFIC CONTROL GOULBURN VALLEY PTY LTD	
Registered in:	Victoria	
Registration Date:	04/05/2022	
Review Date:	04/05/2027	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 TRAFFIC CONTROL GOULBURN VALLEY PTY LTD
Name Start Date:	04/05/2022
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -

- Registered Office	4EAB59035
Address:	
Start Date:	04/05/2022
- Principal Place of Business	7EBW11688
Address:	
Start Date:	01/09/2022
- Previous Principal Place of Business	4EAB59035
Address:	
Start Date:	04/05/2022
Cease Date:	31/08/2022

- Company Officers -

Note:

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the

appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

Director

Name: PAUL MICHAEL CIAVARELLA 7EBW11688
Address: [REDACTED]
Birth Details: [REDACTED] SHEPPARTON VIC
Appointment Date: 01/09/2022
Cease Date:

Name: TYLER BONAT 7EBW11688
Address: [REDACTED]
Birth Details: [REDACTED] EAST MELBOURNE VIC
Appointment Date: 01/09/2022
Cease Date:

Previous Director

Name: MICHAEL GAETANO PORTIA 4EAB59035
Address: [REDACTED]
Birth Details: [REDACTED] KYABRAM VIC
Appointment Date: 04/05/2022
Cease Date: 01/09/2022

Secretary

Name: PAUL MICHAEL CIAVARELLA 7EBW11688
Address: [REDACTED]
Birth Details: [REDACTED] SHEPPARTON VIC
Appointment Date: 01/09/2022
Cease Date:

Name: TYLER BONAT 7EBW11688
Address: [REDACTED]
Birth Details: [REDACTED] EAST MELBOURNE VIC
Appointment Date: 01/09/2022
Cease Date:

Previous Secretary

Name: MICHAEL GAETANO PORTIA 4EAB59035
Address: [REDACTED]
Birth Details: [REDACTED] KYABRAM VIC

Appointment Date: 04/05/2022
Cease Date: 01/09/2022

- Share Structure -

Current

Class:	ORDINARY	7EBW11688
Number of Shares Issued:	100	
Total Amount Paid / Taken to be Paid:	\$100.00	
Total Amount Due and Payable:	\$0.00	

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	70	6EJDC0296
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name: M1 NORTHERN VICTORIA PTY LTD
ACN: 658 640 414
Address: [REDACTED]
Joint Holding: No
Abn: 16 658 640 414

- Holding -

Class:	ORD	Number Held:	30	6EJDC0296
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name: M1 JOINT VENTURES PTY LTD
ACN: 655 692 603
Address: [REDACTED]
Joint Holding: No
Abn: 51 655 692 603

Ceased/Former

- Holding -

Class:	ORD	Number Held:	30	4EAB59035
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	M1 JOINT VENTURES PTY LTD
ACN:	655 692 603
Address:	
Joint Holding:	No
Abn:	51 655 692 603

- External Administration Documents -

There are no external administration documents held for this organisation.

- Charges -

There are no charges held for this organisation.

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced.

At that time ASIC transferred all details of current charges to the PPS Registrar.

ASIC can only provide details of satisfied charges prior to that date.

Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au.

InfoTrack may cap documents for on-file searches to 250.

- Document List -

Notes:

* Documents already listed under Registered Charges are not repeated here.

* Data from Documents with no Date Processed are not included in this Extract.

* Documents with '0' pages have not yet been imaged and are not available via DOCIMAGE. Imaging takes approximately 2 weeks from date of lodgement.

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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	14/04/2025	14/04/2025	2	14/04/2025	6EJDC0296
484N	Change to Company Details Changes to (Members) Share Holdings				
484	07/08/2023	07/08/2023	2	07/08/2023	7ECG78489
484N	Change to Company Details Changes to (Members) Share Holdings				
484	06/09/2022	06/09/2022	2	06/09/2022	7EBW12052

484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	06/09/2022	06/09/2022	3	06/09/2022	7EBW11688
484	Change to Company Details				
484C	Change of Principal Place of Business (Address)				
484E	Appointment or Cessation of a Company Officeholder				
484O	Changes to Share Structure				
484G	Notification of Share Issue				
484N	Changes to (Members) Share Holdings				
201	04/05/2022	04/05/2022	3	04/05/2022	4EAB59035
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: C/- M & T PARTNERS PTY LTD [REDACTED]

Start Date: 16/03/2023

*** End of Document ***

ASIC
Current Business Name Extract**Name: M1 TRAFFIC & LABOUR SERVICES GOULBURN VALLEY**

ASIC Data Extracted 28/07/2026 at 14:39:47

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 60 of the Business Names Registration Act 2011.

Please advise ASIC of any error or omission which you may identify.

Business Name Summary	
Current Business Name Details	
Name:	M1 TRAFFIC & LABOUR SERVICES GOULBURN VALLEY
Date Registered:	04/05/2022
Status:	Registered
Date Cancelled:	Not Applicable
Next Renewal Date:	04/05/2028
Regulator:	ASIC

Address Details	
Current Principal Place of Business	
Address:	
Start Date:	04/05/2022
Current Address for Service of Documents	
Address:	
Start Date:	04/05/2022

Business Name Holder Details	
Holder Type - Incorporated Bodies	
Name:	M1 TRAFFIC CONTROL GOULBURN VALLEY PTY LTD
ACN:	659173574
ABN:	43659173574
Start Date:	04/05/2022

End of Extract

ASIC Data Extracted 28/07/2026 at 15:59

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 658 640 414 M1 NORTHERN VICTORIA PTY LTD -

ACN (Australian Company Number):	658 640 414	Document No.
ABN:	16 658 640 414	
Current Name:	M1 NORTHERN VICTORIA PTY LTD	
Registered in:	Victoria	
Registration Date:	07/04/2022	
Review Date:	07/04/2027	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 NORTHERN VICTORIA PTY LTD
Name Start Date:	07/04/2022
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -**- Registered Office**

4EAB55844

Address:	
Start Date:	07/04/2022

- Principal Place of Business

4EAB55844

Address:	
Start Date:	07/04/2022

- Company Officers -**Note:**

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

[Director](#)

Name: PAUL MICHAEL CIAVARELLA 4EAB55844
Address: [REDACTED]
Birth Details: [REDACTED] SHEPPARTON VIC
Appointment Date: 07/04/2022
Cease Date:

Name: TYLER BONAT 2EYY47186
Address: [REDACTED]
Birth Details: [REDACTED] EAST MELBOURNE VIC
Appointment Date: 07/04/2022
Cease Date:

Secretary

Name: TYLER BONAT 2EYY47186
Address: [REDACTED]
Birth Details: [REDACTED] EAST MELBOURNE VIC
Appointment Date: 07/04/2022
Cease Date:

- Share Structure -

Current

Class: ORDINARY SHARES 4EAB55844
Number of Shares Issued: 100
Total Amount Paid / Taken to be Paid: \$100.00
Total Amount Due and Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class: ORD **Number Held:** 50 4EAB55844

Beneficially Owned: No Fully Paid: Yes

- **Members** -

Name: AAP CIAVARELLA PTY LTD

ACN: 646 552 794

Address:

Joint Holding: No

- **Holding** -

Class: ORD Number Held: 50 2EYY47186

Beneficially Owned: No Fully Paid: Yes

- **Members** -

Name: TYLER BONAT PTY LTD

ACN: 605 779 048

Address:

Joint Holding: No

- **External Administration Documents** -

[There are no external administration documents held for this organisation.](#)

- **Charges** -

[There are no charges held for this organisation.](#)

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced.

At that time ASIC transferred all details of current charges to the PPS Registrar.

ASIC can only provide details of satisfied charges prior to that date.

Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au.

InfoTrack may cap documents for on-file searches to 250.

- **Document List** -

Notes:

* Documents already listed under Registered Charges are not repeated here.

* Data from Documents with no Date Processed are not included in this Extract.

* Documents with '0' pages have not yet been imaged and are not available via DOCIMAGE. Imaging takes approximately 2 weeks from date of lodgement.

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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	19/04/2022	19/04/2022	2	12/04/2022	2EYY47186
484	Change to Company Details				
484A1	Change Officeholder Name or Address				
484A2	Change Member Name or Address				

201	07/04/2022	07/04/2022	3	07/04/2022	4EAB55844
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: PO BOX 200 YARRAWONGA VIC 3730
Start Date: 08/04/2022

*** End of Document ***

Current & Historical Organisation Extract

ASIC Data Extracted 28/07/2026 at 16:01

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 655 692 603 M1 JOINT VENTURES PTY LTD -

ACN (Australian Company Number):	655 692 603	Document No.
ABN:	51 655 692 603	
Current Name:	M1 JOINT VENTURES PTY LTD	
Registered in:	Victoria	
Registration Date:	29/11/2021	
Review Date:	29/11/2026	
Company Bounded By:		

- Current Organisation Details -

Name:	M1 JOINT VENTURES PTY LTD
Name Start Date:	29/11/2021
Status:	Registered
Type:	Australian Proprietary Company
Class:	Limited By Shares
Sub Class:	Proprietary Company

- Company Addresses -

- Registered Office	4EAB38155
Address:	
Start Date:	29/11/2021
- Principal Place of Business	4EAB38155
Address:	
Start Date:	29/11/2021

- Company Officers -

Note:

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

[Director](#)

Name: TONY PARAGALLI 6EIMD6919
Address: [REDACTED]
Birth Details: [REDACTED] MELBOURNE VIC
Appointment Date: 29/11/2021
Cease Date:

Previous Director

Name: MICHAEL GAETANO PORTIA 4EAB38155
Address: [REDACTED]
Birth Details: [REDACTED] KYABRAM VIC
Appointment Date: 29/11/2021
Cease Date: 04/04/2025

Secretary

Name: TONY PARAGALLI 6EIMD6919
Address: [REDACTED]
Birth Details: [REDACTED] MELBOURNE VIC
Appointment Date: 29/11/2021
Cease Date:

Previous Secretary

Name: MICHAEL GAETANO PORTIA 4EAB38155
Address: [REDACTED]
Birth Details: [REDACTED] KYABRAM VIC
Appointment Date: 29/11/2021
Cease Date: 04/04/2025

- Share Structure -

Current

Class: ORDINARY 4EAB38155
Number of Shares Issued: 60
Total Amount Paid / Taken to be Paid: \$60.00
Total Amount Due and Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	30	4EAB38155
Beneficially Owned:	No	Fully Paid:	Yes	

- Members -

Name:	PORTIA NOMINEES PTY LTD
ACN:	608 620 695
Address:	
Joint Holding:	No

- Holding -

Class:	ORD	Number Held:	30	4EAB38155
Beneficially Owned:	No	Fully Paid:	Yes	

- Members -

Name:	JTBPC PARA PTY LTD
ACN:	617 755 530
Address:	
Joint Holding:	No

- External Administration Documents -

[There are no external administration documents held for this organisation.](#)

- Charges -

[There are no charges held for this organisation.](#)

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced.

At that time ASIC transferred all details of current charges to the PPS Registrar.

ASIC can only provide details of satisfied charges prior to that date.

Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au.

InfoTrack may cap documents for on-file searches to 250.

- Document List -

Notes:

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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	15/04/2025	15/04/2025	2	15/04/2025	6EJDH9581
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	18/12/2024	18/12/2024	2	11/12/2024	6EIMD6919
484A1	Change to Company Details Change Officeholder Name Or Address				
484	17/12/2024	17/12/2024	2	11/12/2024	6EILZ1642
484A1	Change to Company Details Change Officeholder Name Or Address				
201	29/11/2021	29/11/2021	4	29/11/2021	4EAB38155
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -**- Contact Address for ASIC use only****Address:** C/- M & T PARTNERS PTY LTD [REDACTED]**Start Date:** 03/12/2024

*** End of Document ***

ASIC Data Extracted 28/07/2026 at 12:47

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 154 671 539 MC TRAFFIC MANAGEMENT PTY LTD -

ACN (Australian Company Number):	154 671 539	Document No.
ABN:	47 154 671 539	
Current Name:	MC TRAFFIC MANAGEMENT PTY LTD	
Registered in:	Victoria	
Registration Date:	07/12/2011	
Review Date:	07/12/2026	
Company Bounded By:		

- Current Organisation Details -

Name:	MC TRAFFIC MANAGEMENT PTY LTD	1E7960822
Name Start Date:	07/12/2011	
Status:	Registered	
Type:	Australian Proprietary Company	
Class:	Limited By Shares	
Sub Class:	Proprietary Company	

- Company Addresses -

- Registered Office		6EZQ45071
Address:	RSM AUSTRALIA PTY LTD [REDACTED]	
Start Date:	15/03/2024	

- Previous Registered Office		6E0687682
Address:	[REDACTED]	
Start Date:	05/12/2017	
Cease Date:	14/03/2024	

- Previous Registered Office		1E7960822
Address:	[REDACTED]	
Start Date:	07/12/2011	
Cease Date:	04/12/2017	

- Principal Place of Business		0EFD61627
Address:	[REDACTED]	
Start Date:	16/11/2018	

- Previous Principal Place of Business

2E2532130

Address: [REDACTED]
Start Date: 29/09/2015
Cease Date: 15/11/2018

- Previous Principal Place of Business

1E7960822

Address: [REDACTED]
Start Date: 07/12/2011
Cease Date: 28/09/2015

- Company Officers -**Note:**

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

Director

Name: MARCELLO LUNEDI 1E7960822
Address: [REDACTED]
Birth Details: [REDACTED] MELBOURNE VIC
Appointment Date: 07/12/2011
Cease Date:

Secretary

Name: MARCELLO LUNEDI 1E7960822
Address: [REDACTED]
Birth Details: [REDACTED] MELBOURNE VIC
Appointment Date: 07/12/2011
Cease Date:

- Share Structure -**Current**

Class: ORDINARY SHARES 2E2108283
Number of Shares
Issued: 120
Total Amount Paid /
Taken to be Paid: \$120.00
Total Amount Due and
Payable: \$0.00

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on

shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	120	0EFD61627
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	M C SERVICES GROUP (AUST) PTY LTD
ACN:	123 509 124
Address:	[REDACTED]
Joint Holding:	No
Abn:	45 123 509 124

Ceased/Former

- Holding -

Class:	ORD	Number Held:	120	1E7960822
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name:	MC LABOUR SERVICES PTY. LTD.
ACN:	078 417 133
Address:	[REDACTED]
Joint Holding:	No
Abn:	14 078 417 133

- External Administration Documents -

There are no external administration documents held for this organisation.

- Charges -

There are no charges held for this organisation.

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced. At that time ASIC transferred all details of current charges to the PPS Registrar. ASIC can only provide details of satisfied charges prior to that date.

Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au. InfoTrack may cap documents for on-file searches to 250.

- Document List -

Notes:

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Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	08/03/2024	08/03/2024	2	08/03/2024	6EZQ45071
484B	Change to Company Details Change of Registered Address				
484	07/12/2018	07/12/2018	2	16/11/2018	0EFD61627
484	Change to Company Details				
484C	Change of Principal Place of Business (Address)				
484A2	Change Member Name or Address				
484	28/11/2017	28/11/2017	2	01/11/2017	6E0687682
484B	Change to Company Details Change of Registered Address				
484	07/10/2015	07/10/2015	2	29/09/2015	2E2532130
484C	Change to Company Details Change of Principal Place Of Business (Address)				
484	08/07/2015	08/07/2015	3	02/07/2015	2E2108283
484	Change to Company Details				
484O	Changes to Share Structure				
484N	Changes to (Members) Share Holdings				
201	07/12/2011	07/12/2011	3	07/12/2011	1E7960822
201C	Application For Registration as a Proprietary Company				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: PO BOX 248 COLLINS STREET WEST VIC 8007
 Start Date: 06/11/2017

- Previous Contact Address for ASIC use only

Address: PO BOX 830 BERWICK VIC 3806
 Start Date: 08/12/2011
 Cease Date: 06/11/2017

*** End of Document ***



**STUART GIBSON LEGAL LLP
LITIGATION LAWYERS**

Stuart Gibson Legal

Email: [REDACTED]

All correspondence to:
PO Box 9094 Brighton, Vic, 3186

-URGENT LEGAL CORRESPONDENCE-

Our Ref: 260004
17 March 2026

URGENT

Via email & Registered Post

Via Email: [REDACTED]
Attention: The Director General
Victorian Infrastructure Delivery Authority
Level 14, 121 Exhibition Street
MELBOURNE VICTORIA 3001

Also, to;
GPO Box 4509
MELBOURNE VICTORIA 3001

OUR CLIENTS: M Group Trades & Labour Services Pty Ltd: MC Traffic Control Pty Ltd

Dear Sirs:

We act for M Group Trades & Labour Services Pty Ltd and M1 Traffic Control Pty Ltd ("**our Clients**") and refer to our previous correspondence to you dated 18 February 2026.

We now write to you in respect of what appears to be a smear campaign by some of your staff to defame, denigrate our Clients with the intention to totally undermine our Clients' contractual relations with not only existing but future clients.

We are further instructed that:-

- You called Kane Construction ("Kane") on or about 5 March 2026 requesting it remove all labour and traffic off Government jobs. Our Clients have been informed that Kane was warned that if it did not it was at peril and risk of winning future work. Approximately five (5) workers were removed;
- On or about the same date you called Symal. The same threat was made . As a result, all of our Clients workers were removed, a total of seventeen (17). However, the traffic controllers were left on;
- On or about 12 March 2026 you approached Build Group. Your representative was Roxy Shirvani. Ms Shirvani advised Build Group that if it continued to use our Clients they would lose their licence and that Vida would therefore not have any duty to pay any labour costs;



Stuart Gibson Legal

Email: [REDACTED]

All correspondence to:
PO Box 9094 Brighton, Vic, 3186

2/

- On or about 16 March 2026 Whelan Group were told by a South East Manager that they could not use our Clients. As a result, our Clients were terminated.

Please confirm as a matter of urgency on what legal basis you were entitled to engage in interfere with our Clients contractual relations. To do so is highly unlawful and actionable.

As this firm currently understand our Clients are lawful suppliers of labour and traffic services and will not tolerate such a blatant disregard of their legal rights to carry on business in the Building and Construction sector.

Our Clients will accept true and accurate reporting and publication of its activities but it will Not accept false, defamatory and injurious reporting and publication of it and it will certainly Not accept any reporting and interference by any Body that aims to interfere with its current and future contractual relations.

In that respect, please advise as a matter of urgency:

1. Provide full particulars of whom You or any of your staff have sent such communications as those referred to above and when; and
2. Provide to this office a response to this office in relation to the communications referred to above. In particular an explanation as to how this occurred and on what basis this occurred;
3. Provide an Undertaking that your office and or its staff will not interfere with any of our Clients contractual relations and approach any of our Clients whatsoever.

Our Clients reserve all of their rights whether legal or equitable.

Yours faithfully

STUART GIBSON PRINCIPAL

Commented [SG1]:



**STUART GIBSON LEGAL LLP
LITIGATION LAWYERS**

Stuart Gibson Legal

Email [REDACTED]

All correspondence to:
PO Box 9094 Brighton, Vic, 3186

-URGENT LEGAL CORRESPONDENCE-

Our Ref: 260004
18 March 2026

URGENT

Via email & Registered Post

Via Email: [REDACTED]
Attention: The Director General
Victorian Infrastructure Delivery Authority
Level 14, 121 Exhibition Street
MELBOURNE VICTORIA 3001

Also, to;
GPO Box 4509
MELBOURNE VICTORIA 3001

OUR CLIENTS: M Group Trades & Labour Services Pty Ltd: M1 Traffic Control Pty Ltd

Dear Sirs:

We act for M Group Trades & Labour Services Pty Ltd and M1 Traffic Control Pty Ltd ("**our Clients**") and refer to our previous correspondence to you dated 18 February 2026.

We now write to you in respect of what appears to be a smear campaign by some of your staff to defame, denigrate our Clients with the intention to totally undermine our Clients' contractual relations with not only existing but future clients.

We are further instructed that:-

- You called Kane Construction ("Kane") on or about 5 March 2026 requesting it remove all labour and traffic off Government jobs. Our Clients have been informed that Kane was warned that if it did not it was at peril and risk of winning future work. Approximately five (5) workers were removed;
- On or about the same date you called Symal. The same threat was made . As a result, all of our Clients workers were removed, a total of seventeen (17). However, the traffic controllers were left on;
- On or about 12 March 2026 you approached Buld Group. Your representative was Roxy Shirvani. Ms Shirvani advised Buld Group that "if M Group lose their licence " they would not pay Buld even if labour costs were incurred prior to the decision of LHA;



Stuart Gibson Legal

All correspondence to:
PO Box 9094 Brighton, Vic, 3186

2/

- On or about 16 March 2026 Whelan Group were told by a South East Manager that they could not use our Clients. As a result, our Clients were terminated.

Please confirm as a matter of urgency on what legal basis you were entitled to engage in interfere with our Clients contractual relations. To do so is highly unlawful and actionable.

As this firm currently understand our Clients are lawful suppliers of labour and traffic services and will not tolerate such a blatant disregard of their legal rights to carry on business in the Building and Construction sector.

Our Clients will accept true and accurate reporting and publication of its activities but it will Not accept false, defamatory and injurious reporting and publication of it and it will certainly Not accept any reporting and interference by any Body that aims to interfere with its current and future contractual relations.

In that respect, please advise as a matter of urgency:

1. Provide full particulars of whom You or any of your staff have sent such communications as those referred to above and when; and
2. Provide to this office a response to this office in relation to the communications referred to above. In particular an explanation as to how this occurred and on what basis this occurred;
3. Provide an Undertaking that your office and or its staff will not interfere with any of our Clients contractual relations and approach any of our Clients whatsoever.

Our Clients reserve all of their rights whether legal or equitable.

Yours faithfully

STUART GIBSON PRINCIPAL

Commented [SG1]:

Confidential

Email

31 March 2026

Mr Stuart Gibson
Principal
Stuart Gibson Legal
PO Box 9094
Brighton VIC 3186

[REDACTED]

Dear Mr Gibson

M Group Trades & Labour Services Pty Ltd and M1 Traffic Control Pty Ltd

We refer to your unsigned letter dated 18 March 2026 addressed to the Director-General of the Victorian Infrastructure Delivery Authority (**VIDA**) in relation to the entities described above.

1. We remind you that we act for VIDA (in that regard, we refer to our letter of 26 February 2026 in response to your 18 February 2026 letter to VIDA concerning the entities described above). For the avoidance of any doubt, any future correspondence concerning the entities described above or any entities related to or associated with them is to be directed to this firm.
2. As a preliminary issue, we refer to the entities your letter describes as your clients. "M Group Trades & Labour Services Pty Ltd" does not appear to be the name of an Australian company. However, we understand that "M Group Trades and Labour" is a business name under which M1 Trades & Labour Pty Ltd operates. In those circumstances, it is not clear for which entity or entities you act, other than M1 Traffic Control Pty Ltd.
3. We understand that:
 - (a) M1 Trades & Labour Pty Ltd currently holds a labour hire licence under the *Labour Hire Licensing Act 2018* (Vic) (**Act**);
 - (b) on 4 March 2026, the Labour Hire Authority (**LHA**) issued a notice of intention to cancel the labour hire licence held by M1 Trades & Labour Pty Ltd; and
 - (c) the labour hire licence held by M1 Traffic Control Pty Ltd expired on 24 November 2024.
4. Against that background, we assume that the matters referred to in your letter concern M1 Traffic Control Pty Ltd and M1 Trades & Labour Pty Ltd (for whom your correspondence has not confirmed you act).
5. As a general observation, VIDA necessarily maintains regular dialogue with the head contractors it has appointed to its projects, given it is responsible for delivering Victoria's transport and health infrastructure programs. Those head contractors are responsible for the engagement and management of subcontractors working on VIDA's projects. On any view, it is entirely appropriate for VIDA to:
 - (a) make enquiries of its head contractors about steps they are taking or may take in response to enforcement action or activity undertaken by LHA or any other regulator in respect of subcontractors they have engaged; and

Mr Stuart Gibson, Stuart Gibson Legal

31 March 2026

- (b) remind those head contractors of their legal obligations, having regard to the regulatory environment and relevant contractual relationships.
6. In the circumstances outlined above, VIDA will not engage with the allegations made in your letter other than to refute them. Similarly, VIDA will not respond to the demands set out in your letter.

Yours sincerely



Lindsey Cregan, Partner



Stephen Silvapulle, Special Counsel



Our ref 15512/20284/81049286

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Email: [REDACTED]

-URGENT LEGAL CORRESPONDENCE-

31 March 2026

CONFIDENTIAL – BY EMAIL

Your ref: 15512/20284/81049286

Dear Ms Cregan and Mr Silvapulle,

We refer to your letter of 31 March 2026 and respond as follows.

1. Preliminary Matter – Entity Names

We note your observations regarding entity nomenclature. For the avoidance of doubt and to remove any purported ambiguity, this firm acts for M1 Traffic Control Pty Ltd and M1 Trades & Labour Pty Ltd, the latter trading under the business name “M Group Trades and Labour”. We trust this resolves any confusion. We observe that VIDA’s lawyers have been on notice of the identity of our clients since at least 26 February 2026, and the raising of this point at this stage appears to be a deflection from the substantive issues raised in our letter rather than a genuine concern. It will not be permitted to serve that function.

2. VIDA's Failure to Deny the Specific Allegations is Noted

Your letter is conspicuously silent on the substance of the specific allegations set out in our letter of 17 March 2026. To be precise, your letter does not deny — and therefore does not refute — any of the following:

- That VIDA contacted Kane Construction on or about 5 March 2026 and requested the removal of all labour and traffic personnel from Government jobs, with the implicit or explicit threat that Kane's future work prospects would be jeopardised if it failed to comply, resulting in the removal of approximately five workers employed by our clients;
- That VIDA made the same or substantially similar threat to Symal on or about the same date, resulting in the removal of seventeen of our clients' workers from Government projects;
- That on or about 12 March 2026, VIDA's representative Ms Roxy Shirvani expressly told Build Group that if it continued to engage our clients it would lose its licence, and that VIDA would have no duty to meet any associated labour costs;
- That on or about 16 March 2026, a VIDA South East Manager told Whelan Group it could not engage our clients, resulting in the termination of our clients' engagement.

Your letter states that VIDA “refutes” the allegations in our letter. That is not a denial of the specific facts alleged. A bare refusal to engage is not a refutation. The specific, particularised conduct described above — including the identity of VIDA’s representative (Ms Shirvani) and the dates of each intervention — stands uncontested on your client’s response.

3. VIDA’s Purported Justification Has No Legal Foundation

Your letter asserts that it is “entirely appropriate” for VIDA to make enquiries of head contractors and remind them of their legal obligations. We do not dispute that VIDA has a legitimate interest in regulatory compliance among its supply chain. That is not what is alleged.

What is alleged — and what your letter does not deny — is that VIDA’s representatives went substantially further than making enquiries. The conduct alleged constitutes:

- Unlawful interference with contractual relations: VIDA’s conduct, including threats that head contractors would lose future work or licences if they continued to engage our clients, constitutes the tort of inducing breach of contract or, at minimum, tortious interference with existing and prospective contractual relations. That our clients had active, lawful engagements with Kane, Symal, Build Group and Whelan Group at the relevant times is not in dispute.
- Conduct potentially constituting intimidation: The making of threats to third parties — that adverse commercial consequences would follow from continued engagement of our clients — is capable of constituting the tort of intimidation.
- Defamation and injurious falsehood: To the extent that VIDA’s representatives communicated false statements of fact about our clients’ legal status or fitness to operate — including representations that our clients faced licence cancellation when no such cancellation had occurred — those communications are actionable.

Your letter offers no legal basis — statutory, contractual or otherwise — that would authorise VIDA to direct head contractors to terminate existing subcontracts with our clients. The existence of a notice of intention to cancel a labour hire licence is not a cancellation. M1 Trades & Labour Pty Ltd holds a current, valid labour hire licence as at the date of this letter. VIDA’s conduct in treating an unresolved regulatory process as if it were a final adverse determination is, with respect, untenable and exposed.

4. The LHA Notice of Intention to Cancel Does Not Justify VIDA’s Conduct

Your letter refers to the Labour Hire Authority’s notice of intention to cancel the licence held by M1 Trades & Labour Pty Ltd, issued on 4 March 2026. We make the following observations:

- A notice of intention to cancel is a preliminary step in an administrative process. It is not a finding of fact, not a cancellation, and not a determination of any kind. Our client retains the right to respond to that notice and has done so.
- M1 Trades & Labour Pty Ltd continues to hold a valid labour hire licence. It is a lawful operator. VIDA has no legal basis to treat it otherwise until and unless a final determination is made by the LHA.
- VIDA’s conduct in preemptively directing head contractors to remove our clients from Government projects — before any cancellation has occurred — is not a legitimate exercise of regulatory oversight. It is, at best, premature interference. At worst, it is deliberate economic sabotage of a licensed business carried out under colour of regulatory authority.
- We further note that M1 Traffic Control Pty Ltd’s position regarding the lapse of its traffic control licence is a matter your client was aware of and which does not affect the substance of the tortious conduct alleged in respect of the labour hire operations.

5. Our Demands Remain Outstanding

Your client has declined to respond to the three specific demands set out in our letter of 17 March 2026. Those demands are maintained in full. In addition, we now formally demand that VIDA:

1. Within seven (7) days of the date of this letter, provide full particulars of all communications made by VIDA or any of its representatives to Kane Construction, Symal, Build Group, Whelan Group, or any other head contractor or subcontractor, concerning our clients, including the date, identity of the VIDA representative, and the substance of each communication;
2. Within seven (7) days, provide a written undertaking, in terms acceptable to this firm, that VIDA and all of its officers, employees and agents will immediately cease making any representation, communication or threat to any person concerning our clients' engagement in the building and construction sector;
3. Within fourteen (14) days, confirm whether VIDA is prepared to engage in without prejudice discussions concerning compensation for the losses suffered by our clients as a direct result of the conduct described herein, which losses are presently estimated to be substantial and continue to accrue daily.

6. Notice of Intended Proceedings

We put your client on notice that in the event the above demands are not met in full within the timeframes specified, our clients intend to seek, without further notice:

- Urgent injunctive relief in the Supreme Court of Victoria restraining VIDA from further interference with our clients' contractual and business relationships;
- Damages for the torts of interference with contractual relations, intimidation, and injurious falsehood;
- An order for discovery of all internal communications within VIDA concerning our clients, including communications involving Ms Roxy Shirvani and any South East Manager of VIDA;
- Costs of and incidental to these proceedings on an indemnity basis.

We note that VIDA is a public authority accountable for the expenditure of public funds. The decision to instruct a national law firm to refuse engagement and resist legitimate legal claims in circumstances where the specific factual allegations are not denied will be the subject of scrutiny if this matter proceeds to litigation.

We await your client's response as a matter of urgency.

Yours faithfully,

STUART GIBSON
Principal
Stuart Gibson Legal LLP

Confidential

Email

2 April 2026

Mr Stuart Gibson
Principal
Stuart Gibson Legal
PO Box 9094
Brighton VIC 3186
[REDACTED]

Dear Mr Gibson

M1 Traffic Control Pty Ltd and M1 Trades & Labour Pty Ltd (trading as M Group Trades and Labour)

We refer to your letter dated 31 March 2026 in response to our letter of the same date.

Thank you for confirming the companies for whom you act.

For clarity, VIDA denies the allegations set out in your letter dated 18 March 2026 (and reiterates that denial in respect of your 31 March 2026 letter). We disagree with section 2 of your 31 March 2026 letter.

Nevertheless, VIDA will provide a substantive response to your letter to enable your clients to further consider their position, and we are obtaining instructions in that regard. Given the Easter break is imminent, VIDA will not be in a position to provide that response by Tuesday, 7 April 2026 as requested. However, it anticipates it should be able to do so by Friday, 10 April 2026.

We note that it is not in dispute that VIDA has a legitimate interest in regulatory compliance among the supply chain on VIDA projects. VIDA can assure your clients that it has not made, and will not make, any unlawful threats or representations to any person regarding your clients' engagement in the building and construction sector.

In the circumstances, VIDA requests that your clients refrain from taking any precipitous action along the lines referred to in section 6 of your letter.

Yours sincerely

[REDACTED]

Lindsey Cregan, Partner

[REDACTED]
[REDACTED]

Stephen Silvapulle, Special Counsel

[REDACTED]
[REDACTED]

Our ref 15512/20284/81049286

Confidential

Email

13 April 2026

Mr Stuart Gibson
Principal
Stuart Gibson Legal
PO Box 9094
Brighton VIC 3186
[REDACTED]

Dear Mr Gibson

M1 Traffic Control Pty Ltd and M1 Trades & Labour Pty Ltd (trading as M Group Trades and Labour)

We refer to your letter dated 31 March 2026 (and to your letter addressed to VIDA dated 18 March 2026), and to our letter of 2 April 2026 which indicated that, while VIDA denied the allegations made by your clients, it would provide a further, substantive response to your correspondence.

This letter provides that response. First, the specific allegations made in your correspondence are addressed, followed by other matters raised in your correspondence, and, finally, VIDA's position in response to your clients' demands.

1. VIDA's response to your clients' specific allegations

- 1.1 We refer to the fact that on 4 March 2026, the Labour Hire Authority (LHA) issued a notice of intention to cancel the labour hire licence held by M1 Trades & Labour Pty Ltd (M1 Trades) pursuant to the *Labour Hire Licensing Act 2018* (Vic).
- 1.2 VIDA closely monitors regulatory enforcement activity and actions within the building and construction industry, including those undertaken by the LHA. As you have acknowledged, VIDA has a legitimate interest in regulatory compliance among its supply chain. Consequently, by 5 March 2026, VIDA was aware of the notice issued to M1 Trades referred to in paragraph 1.1. Relevant to the assertions in section 4 of your 31 March letter, VIDA is aware of LHA's enforcement processes and knew that M1 Trades continued to hold a labour hire licence (and, as at the time of writing, still does). The steps VIDA took once it learned of the notice LHA had issued to M1 Trades were undertaken in the context of that knowledge.
- 1.3 Consistent with the matters set out in paragraph 5 of our 31 March 2026 letter, shortly after learning of the notice issued by LHA, VIDA contacted contractors responsible for their projects to understand which contractors were using M1 Trades and ensure those contractors were aware of LHA's action in relation to M1 Trades (noting that M1 Trades uses the business name "M Group Trades and Labour"). In some cases VIDA also sought to ascertain whether contingency plans were being developed if LHA's action against M1 Trades ultimately resulted in M1 Trades losing its labour hire licence.
- 1.4 At no stage throughout these activities did VIDA direct any of its contractors to cease using M1 Trades or any M Group entities. In this regard, VIDA notes its understanding that a number of VIDA's contractors have continued to use M1 Trades and other M Group entities on VIDA projects.
- 1.5 Further information in relation to the contact VIDA made with each of the contractors identified in your correspondence is provided below.

Level 15, 1 Bligh Street
Sydney NSW 2000

GPO Box 9808
Sydney NSW 2001
DX 370 Sydney

[REDACTED]
www.claytonutz.com

13884427000 4

Kane Constructions

- 1.6 Following VIDA's enquiries, VIDA understands that Kane Constructions made its own corporate decision to cease using M Group entities on certain government projects, but that it would continue to use M Group on other projects. This was a decision made at Kane Constructions' discretion and not made in response to any direction from VIDA.

Symal

- 1.7 Following VIDA's enquiries, the Burke to Tram Alliance (**BTA**) (of which Symal Infrastructure Pty Ltd (**Symal**) is a member), confirmed to VIDA the use of M1 Trades on North East Link. VIDA's understanding following that interaction was that M1 Trades continued to be utilised by BTA in relation to North East Link, while BTA was preparing contingency plans in the event of LHA cancelling M1 Trades' licence.
- 1.8 Also following VIDA's enquiries, Symal confirmed the use of M1 Trades on the Pakenham Roads Upgrade WP3 and Ballan Road projects. VIDA is not aware of Symal making any change to its utilisation of M1 Trades on those projects.
- 1.9 VIDA also understands that M1 Traffic Control Pty Ltd (**M1 Traffic**) had been used by Symal on North East Link and the Pakenham Roads Upgrade project but this ceased prior to 2026.

Bild

- 1.10 Following VIDA's enquiries, Bild Infrastructure Pty Ltd (**Bild**) confirmed to VIDA the use of M1 Trades on the Barwon Heads WP4 project and that it would utilise an alternative labour hire company if M1 Trades' licence were cancelled.
- 1.11 Specifically in regard to the interaction between VIDA and Bild on 12 March 2026:
- (a) a VIDA representative, Ms Roxy Shirvani, met with a Bild representative on that date;
 - (b) that meeting was a regular contract relationship meeting which had been arranged on 26 February 2026 at Bild's request – it was not held in response to the notice the LHA issued to M1 Trades on 4 March 2026 and did not concern M1 Trades;
 - (c) the topic of LHA licences was not discussed during that meeting; and
 - (d) for the avoidance of any doubt, the statements attributed to Ms Shirvani in your 18 and 31 March letters are denied.

Whelans

- 1.12 Following VIDA's enquiries, Whelans Group Investments Pty Ltd (**Whelans**) indicated that it was using M1 Traffic.
- 1.13 Between about 6 and 13 March 2026 there was some further communication between VIDA and Whelans to ascertain the nature of the services provided by M1 Traffic and whether M1 Traffic would require a labour hire licence.
- 1.14 On around 13 March 2026, Whelans indicated to VIDA that Whelans was satisfied that a labour hire licence was not required for the services being provided by M1 Traffic, but that it had nevertheless decided to change traffic management providers.

Mr Stuart Gibson, Stuart Gibson Legal

13 April 2026

- 1.15 At no point during the communications between VIDA and Whelans did any VIDA representative indicate to Whelans that it could not use M1 Traffic. For the avoidance of any doubt, the statements attributed to "a South East Manager" in your 18 and 31 March letters are denied.
2. **VIDA's response to your clients' asserted claims generally**
- 2.1 Your clients assert various tortious claims based on the serious allegations made against VIDA at a high level of generality, without reference to any evidence beyond bare assertions. As explained above, and has been previously communicated, VIDA denies each of those allegations. The conduct which your clients allege VIDA engaged in did not occur. In the circumstances, your clients have no basis for making, or maintaining, any such claims against VIDA.
- 2.2 In the circumstances, VIDA sees no utility in further engaging with the asserted claims. For the record, this does not amount to, and is not to be taken as, an indication that any aspect of those claims (or any other assertion made in your correspondence that is not specifically addressed in this letter) is or would be uncontested by VIDA.
- 2.3 More generally, neither VIDA nor any of its representatives have been, or are, engaged in a "smear campaign" against your clients. There is no dispute that VIDA has a legitimate interest in regulatory compliance by entities within its supply chain, and is entitled to make enquiries of its contractors where regulatory action is on foot. The communications VIDA engaged in with its contractors concerning your clients during March 2026 as referred to above were purely directed to ascertaining that such compliance would continue, and were entirely legitimate.
3. **VIDA's response to your clients' demands**
- 3.1 We refer to the demands made in your 18 and 31 March 2026 letters, and address them below.
- 3.2 As regards items 1 and 2 of your 18 March letter and item 1 in section 5 of your 31 March letter, VIDA has explained in section 1 above its engagement with contractors, including Kane Constructions, Symal, Bild and Whelans, in relation to M1 Trades (and, where applicable, M1 Traffic) following LHA Issuing the relevant notice to M1 Trades on 4 March 2026.
- 3.3 As regards item 3 of your 18 March letter and item 2 in section 5 of your 31 March letter, VIDA reiterates the assurance given by our 2 April letter that it has not made, and will not make, any unlawful threats or representations to any person regarding your clients' engagement in the building and construction sector. However, VIDA will maintain its legitimate interest in regulatory compliance among the supply chain on its projects and take appropriate and lawful actions where warranted.
- 3.4 As regards item 3 in section 5 of your 31 March letter, VIDA will not engage in any discussions concerning "compensation" in circumstances where there is no basis for the claims asserted against VIDA.

Mr Stuart Gibson, Stuart Gibson Legal

13 April 2026

4. Proceedings

- 4.1 Should your clients commence any proceedings despite the information and the assurance VIDA has provided to them concerning the issues raised by your correspondence, VIDA will have no choice but to vigorously defend such proceedings.

Yours sincerely

[Redacted signature]

Lindsey Cregan, Partner

[Redacted contact information]

Stephen Silvapulle, Special Counsel

[Redacted contact information]

Our ref 15512/20284/81049286

Stuart Gibson Legal

PO Box 9094, Brighton VIC 3186
[REDACTED]

14 April 2026

Confidential — By Email

Lindsey Cregan, Partner

Stephen Silvapulle, Special Counsel

Clayton Utz

Level 15, 1 Bligh Street

Sydney NSW 2000
[REDACTED]
[REDACTED]

Dear Ms Cregan and Mr Silvapulle,

RE: M1 Traffic Control Pty Ltd and M1 Trades & Labour Pty Ltd (trading as M Group Trades and Labour)

Our ref: 260004 | Your ref: 15512/20284/81049286

We refer to your letter of 13 April 2026 (Response). We have considered it carefully on behalf of our clients and respond as follows. While we acknowledge that VIDA has now engaged substantively, the Response raises as many questions as it answers and discloses a number of significant admissions. It does not displace the claims our clients maintain. Our clients' position is stronger than ever.

1. VIDA's Admissions — What the Response Concedes

1. Before addressing VIDA's denials, it is important to record what the Response **admits**:
 - (a) VIDA was aware by 5 March 2026 — the day after the LHA notice — that M1 Trades **continued to hold a valid labour hire licence**. VIDA's own letter states this expressly. Every subsequent action VIDA took was therefore taken in the knowledge that our clients were operating lawfully.
 - (b) VIDA proactively contacted Kane Constructions, Symal/BTA, Bild Infrastructure, and Whelans within days of the LHA notice — specifically to discuss the notice and its implications for our clients.
 - (c) VIDA acknowledges it actively enquired whether contractors were preparing **contingency plans** to replace our clients in the event of licence cancellation. This is

not passive compliance monitoring — it is actively encouraging contractors to plan for our clients' removal from the supply chain.

- (d) Kane Constructions ceased using M Group on certain government projects — the precise outcome our clients' instructions describe VIDA demanding on 5 March 2026.
 - (e) Whelans determined that M1 Traffic did **not** require a labour hire licence — yet still changed providers. VIDA offers no coherent explanation for this.
2. These admissions are significant. They establish the factual foundation of our clients' claims. The question is not whether VIDA made contact — it admits it did — but whether the nature and effect of that contact crossed the line from legitimate enquiry into unlawful interference. We say clearly that it did.

2. Response to VIDA's Specific Denials

Kane Constructions

- 3. Our clients' instructions are that on or about 5 March 2026, VIDA contacted Kane and demanded the removal of **all M Group labour and traffic from Government jobs**, warning that Kane was "at peril and risk" of losing future Government work if it did not comply. Five workers were removed.
- 4. Your Response describes this as Kane making an "independent corporate decision." That characterisation is rejected. A decision made immediately following VIDA's contact — by a contractor dependent on VIDA for future Government project allocations — cannot credibly be described as independent. The commercial leverage VIDA holds over its supply chain contractors is obvious and substantial. A warning that future work is at risk is, in any practical sense, a **direction**.
- 5. We require the following particulars in relation to the Kane contact:
 - (a) The precise date(s), medium, and individuals involved in all communications between VIDA and Kane Constructions from 4 to 20 March 2026;
 - (b) The full substance of those communications, including any reference to future Government work or contract allocation; and
 - (c) All written records, including emails, text messages, call notes, or internal reports.

Symal / Burke to Tram Alliance (BTA)

- 6. Our clients' instructions are that on or about 5 March 2026, VIDA made the same threat to Symal as it made to Kane. As a direct result, **seventeen (17) M Group workers were removed** from Symal projects, though traffic controllers were left on.
- 7. Your Response states VIDA is unaware of any change to Symal's use of M1 Trades on Pakenham Roads Upgrade WP3 and Ballan Road. We note however that your own letter confirms VIDA contacted BTA and enquired about contingency planning. The removal of 17 workers from Symal projects is a quantified, direct loss that followed VIDA's contact. We require the same particulars as sought in paragraph 5 above in relation to all Symal and BTA communications.

Bild Infrastructure — Ms Roxy Shirvani

8. The allegations regarding the 12 March 2026 Bild meeting are among the most serious in this matter. Our clients' instructions — consistent with their direct information from Bild — are that Ms Roxy Shirvani advised Bild that:
 - (a) if Bild continued to use M Group, it would **lose its licence**; and
 - (b) VIDA would therefore have **no duty to pay any labour costs** — a direct and specific financial threat.
9. Your Response describes the 12 March meeting as a "regular contract relationship meeting" arranged on 26 February 2026 at Bild's request that "did not concern M1 Trades." This account is **directly contradicted** by our clients' instructions. We make the following observations:
 - (a) The characterisation of the meeting as pre-arranged is not inconsistent with VIDA using that meeting as an opportunity to raise M1 Trades — this happens routinely in commercial dealings;
 - (b) Even if the meeting had another primary purpose, that does not preclude M1 Trades being raised during it;
 - (c) The specific financial threat attributed to Ms Shirvani — loss of licence and VIDA's refusal to pay labour costs — is highly particularised. This is not the kind of detail that is fabricated.
10. We require VIDA to:
 - (a) Identify, by name and role, the Bild representative present at the 12 March meeting;
 - (b) Produce any agenda, notes, or record of the 12 March meeting;
 - (c) Confirm the full scope of topics discussed at that meeting; and
 - (d) Confirm Ms Shirvani's role and responsibilities at VIDA and the nature of her relationship with Bild.
11. Ms Shirvani's denial is on instructions from VIDA's lawyers. It is not evidence. This dispute will be resolved through discovery and, if necessary, Ms Shirvani giving evidence under oath.

Whelans Group

12. Our clients' instructions are that on or about 16 March 2026, a VIDA South East Manager told Whelans directly that it **could not use M Group**. As a result, our clients were **terminated** by Whelans.
13. Your Response admits that between 6 and 13 March 2026, VIDA communicated with Whelans specifically to query whether M1 Traffic required a labour hire licence. VIDA then admits that Whelans concluded no licence was required — yet still changed providers. VIDA's Response offers no explanation for this outcome. We submit the explanation is obvious: VIDA's communications had a coercive effect on Whelans regardless of the formal licensing position.
14. We note the additional concern that the 31 March Clayton Utz letter draw attention to the fact that M1 Traffic Control Pty Ltd's labour hire licence expired on 24 November 2024. We require VIDA to confirm:
 - (a) Whether VIDA raised the expiry of M1 Traffic's licence with Whelans during their communications; and

(b) If so, in what terms — and whether any statement was made to the effect that M1 Traffic was unlicensed or non-compliant.

15. VIDA denies all statements attributed to the "South East Manager." We require VIDA to identify, by name and role, the individual(s) who communicated with Whelans between 6 and 16 March 2026.

3. The "Legitimate Compliance Interest" Defence Is Misconceived and Must Fail

16. VIDA's central and repeated defence is that all of its conduct amounted to a legitimate exercise of its interest in regulatory compliance within its supply chain. This defence is misconceived on multiple grounds and, we submit, will not withstand scrutiny. We address each limb in turn.

(a) A legitimate purpose does not authorise unlawful means

17. Even accepting — which our clients do not — that VIDA had a legitimate interest in monitoring regulatory compliance within its supply chain, that interest does not licence VIDA to pursue that objective by unlawful means. The law is well established: a party may have a perfectly legitimate underlying purpose and yet still be liable in tort if the means by which it pursues that purpose constitute unlawful interference, intimidation, or the making of false or misleading representations. VIDA cannot launder unlawful conduct by pointing to a lawful goal.
18. The relevant question is not whether VIDA had a compliance interest — our clients have never denied that it did. The relevant question is whether the specific communications VIDA made to Kane, Symal, Bild, and Whelans were a proportionate, accurate, and lawful exercise of that interest. We say plainly that they were not.

(b) A notice of intention to cancel is not a cancellation — and VIDA knew it

19. VIDA itself acknowledges that it was aware M1 Trades continued to hold a valid labour hire licence at the time it contacted the contractors. The LHA had issued a notice of intention to cancel — a preliminary procedural step that initiates a show-cause process — not a cancellation or suspension. M1 Trades was, and remains, a licensed and lawful operator.
20. A proportionate, legitimate compliance response to such a notice, in respect of a subcontractor who continues to hold a valid licence, would be — at most — to note the development internally and monitor the LHA process. It would not be to immediately contact four separate contractors across multiple major projects within 24 hours, encourage contingency planning for our clients' replacement, and — on our clients' instructions — threaten those contractors with loss of future Government work and licence jeopardy if they continued engaging our clients. That conduct is wholly disproportionate to, and inconsistent with, any legitimate compliance purpose.

(c) The specific statements attributed to VIDA's representatives were threats, not enquiries

21. VIDA frames its contractor communications as neutral information-sharing and routine enquiry. Our clients' instructions tell a very different story. The specific conduct alleged is:

- (i) **Kane Constructions:** VIDA demanded removal of all M Group labour and traffic from Government jobs and warned Kane it was "at peril and risk" of losing future work if it did not comply. Five workers were removed. This is not a compliance enquiry. It is economic coercion — the use of VIDA's power over future Government contract allocations to compel a commercial outcome adverse to our clients.
- (ii) **Bild Infrastructure:** Ms Shirvani told Bild it would lose its licence and that VIDA would have no duty to pay labour costs if Bild continued using M Group. This statement was false and alarmist. There is no legal basis upon which a contractor's continued engagement of a licensed subcontractor could cause the contractor itself to lose its licence. The representation was designed to cause immediate alarm and commercial rupture. This is precisely the kind of false or misleading representation that attracts liability under the Australian Consumer Law and in injurious falsehood.
- (iii) **Whelans:** A VIDA South East Manager told Whelans directly that it could not use M Group. This was not a suggestion, an enquiry, or a compliance note. It was a prohibition — stated by a representative of the authority that controls access to the very projects on which Whelans depends for its commercial viability.

22. None of these communications bear any resemblance to a legitimate compliance enquiry. They are, on our clients' instructions, a coordinated campaign of pressure, false representations, and economic threat.

(d) The conduct was wholly disproportionate to any legitimate compliance objective

23. Proportionality is not merely a principle of administrative law — it is relevant to whether conduct that causes economic harm to a third party can properly be characterised as the legitimate exercise of a right or interest. We note the following matters, which demonstrate the disproportionate nature of VIDA's conduct:

- (i) M1 Trades held a valid licence throughout. The LHA process had not concluded. VIDA had no basis to treat our clients as non-compliant or to communicate with contractors as though they were;
- (ii) VIDA contacted four contractors simultaneously and within 24 hours of the LHA notice. This was not careful, measured compliance monitoring — it was an immediate and coordinated multi-front intervention;
- (iii) The direct financial consequences — five workers removed from Kane, seventeen removed from Symal, and the total termination of the Whelans relationship — are grossly disproportionate to any compliance objective that could not have been achieved by simply advising contractors to note the LHA notice and continue to monitor; and
- (iv) VIDA made no attempt to contact our clients directly before reaching out to their contractors — a step that any party acting in good faith compliance would have taken as a first, not last, resort.

(e) VIDA's dominant market position amplifies its liability

24. VIDA is the Victorian Government's principal infrastructure delivery authority, controlling access to some of the largest and most lucrative construction projects in the State. The contractors it contacted — Kane, Symal, Bild, and Whelans — are all dependent on VIDA's goodwill and continued engagement for their participation in those projects. In this context, VIDA's communications were not those of a neutral third party making routine enquiries. They were communications from the single most powerful commercial

actor in the supply chain, carrying with them the implicit and, on our instructions, explicit threat of commercial consequences.

25. In this context, the distinction VIDA seeks to draw between a "direction" and an "enquiry" is illusory. When a government authority with control over billions of dollars of infrastructure contracts contacts a subcontractor's clients and raises questions about that subcontractor's regulatory status — in terms that on our instructions included explicit warnings about future work and licence jeopardy — the practical effect on the recipients is indistinguishable from a direct instruction. The law does not require express words of direction to establish unlawful interference. It is sufficient that the defendant's conduct, viewed objectively, was calculated to cause and did cause the contractor to act to the detriment of the claimant.

(f) The "independent decision" characterisation is not credible

26. VIDA repeatedly characterises the decisions of Kane, Whelans, and others to alter or terminate their relationships with M Group as independent corporate decisions made at the contractors' own discretion. This characterisation is rejected:
- (i) Each contractor decision occurred immediately following VIDA's contact — not weeks or months later, but within days or hours, in direct temporal sequence;
 - (ii) The pattern of conduct is consistent across four separate contractors simultaneously — this is inconsistent with independent decision-making and entirely consistent with a coordinated response to a common external pressure from VIDA;
 - (iii) In the case of Whelans, the contractor expressly concluded that no labour hire licence was required — and yet still terminated our clients. On VIDA's own account, there was no compliance rationale for that decision. The only coherent explanation is that VIDA's communications were coercive in effect, whatever their form; and
 - (iv) A decision made by a contractor that depends on VIDA for access to Government work, in direct response to contact from VIDA questioning the regulatory status of its subcontractor, and accompanied by warnings about future contract allocations, cannot meaningfully be described as an independent decision. The commercial reality of the relationship between VIDA and its contractors makes true independence impossible in these circumstances.

4. VIDA's "Assurance" Regarding Future Conduct Is Inadequate

16. In paragraph 3.3 of the Response, VIDA purports to give an "assurance" that it has not made and will not make any unlawful threats or representations regarding our clients' engagement in the building and construction sector. This assurance is **entirely inadequate** for the following reasons:
- (a) **It is conditional and self-serving.** The assurance is limited to conduct that VIDA itself characterises as "unlawful." Since VIDA denies that any of its past conduct was unlawful, the assurance provides no meaningful protection — it simply commits VIDA to not doing what it claims it never did.
 - (b) **It does not address the specific conduct complained of.** Our clients do not seek a generic assurance. They seek a specific undertaking that VIDA will not contact contractors regarding M Group's regulatory status, licence position, or suitability as a subcontractor in terms that could discourage, deter, or cause the termination of commercial relationships with our clients.

- (c) **It is unenforceable in its current form.** A bare assurance in a solicitor's letter, qualified by VIDA's own characterisation of lawfulness, cannot be enforced. Our clients require a formal written undertaking in terms to be agreed — or, failing agreement, an injunction.
 - (d) **VIDA's stated intention to continue "appropriate and lawful actions" is a cause for concern, not comfort.** The reservation of VIDA's right to take further action regarding supply chain compliance — in the same letter that denies all wrongdoing — signals that VIDA considers its past conduct legitimate and may repeat it.
17. Accordingly, the assurance in paragraph 3.3 of the Response is rejected as insufficient. Our clients' demand for a formal, specific undertaking is maintained. In the absence of such an undertaking, we will seek injunctive relief as part of any proceedings commenced.

5. Demands Maintained and Supplemented

18. Our clients' demands as set out in our 17 March and 31 March 2026 letters are maintained in full. We now require, within 14 days:
- (a) Full particulars of all communications between VIDA and each of Kane Constructions, Symal/BTA, Bild Infrastructure, and Whelans from 4 March 2026 to date, including date, medium, VIDA representative(s) involved, and full substance;
 - (b) Copies of all written records (emails, texts, meeting notes, call notes, internal reports or memoranda) relating to each of those communications;
 - (c) Identification by name and role of: (i) the VIDA representative who communicated with Kane; (ii) the VIDA representative who communicated with Symal/BTA; (iii) Ms Shirvani's specific role and Bild relationship; and (iv) the "South East Manager" who communicated with Whelans;
 - (d) Confirmation of whether the expiry of M1 Traffic's licence was raised with Whelans and, if so, the terms in which it was raised;
 - (e) A written undertaking that VIDA will not make any further communications to any contractor that could discourage, deter, or cause the termination of commercial relationships with our clients; and
 - (f) Engagement in good faith discussions regarding compensation for our clients' quantified losses, which include the removal of 22 workers across Kane and Symal projects and the termination of the Whelans relationship.

6. Causes of Action — Notice

19. We are instructed to commence proceedings in the absence of a satisfactory response. We are presently finalising advice on the causes of action to be pursued, which include but are not limited to:
- (a) **Unlawful interference with contractual relations** — VIDA's conduct induced Kane, Symal, Bild, and Whelans to breach, alter, or terminate contractual and commercial arrangements with our clients;
 - (b) **Misleading or deceptive conduct under the Australian Consumer Law** — including the representation to Bild that it would "lose its licence" (which was false and alarmist) and any misrepresentation regarding M1 Traffic's licensing status to Whelans;

- (c) **Injurious falsehood** — false statements made to third parties concerning our clients' regulatory status causing quantifiable economic loss;
 - (d) **Intimidation** — threats of economic harm (loss of future Government work; loss of licence) made to third parties with the intention and effect of harming our clients; and
 - (e) **Potential contraventions of the Competition and Consumer Act 2010 (Cth)**, including misuse of market power, to the extent applicable given VIDA's dominant position in the Victorian infrastructure supply chain.
20. VIDA's indication that it will "vigorously defend" any proceedings is noted. Our clients are not deterred.

7. Reservation of Rights

21. All of our clients' rights, whether legal or equitable, are fully reserved. This letter is written without prejudice to any other rights or remedies available to our clients. Should a satisfactory response not be received within 14 days, we are instructed to file proceedings without further notice.

Yours faithfully,

Stuart Gibson
Principal
Stuart Gibson Legal