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# Co-operative Supermarkets Australia

## Modern Slavery Statement

Financial year ending 30 June 2025



CO-OPERATIVE  
SUPERMARKETS  
AUSTRALIA

# CEO Message



FY2025 was Co-operative Supermarkets Australia's (CSA) initial year preparing for mandatory reporting under the Modern Slavery Act 2018 (Cth). As a lean organisation with limited internal resources, CSA used this period to build foundational understanding of its obligations and to plan how it would begin assessing modern slavery risks across its supplier base.

While no formal policies or structured programs were in place during FY2025, CSA recognises the important role independent supermarkets play in supporting ethical and transparent supply chains. This preparatory phase has informed the more developed governance framework that commenced in FY2026.

CSA remains committed to continuous improvement as our modern slavery program matures.

**James Lane**

Chief Executive Officer

Co-operative Supermarkets Australia

# 1. Our Structure, Operations and Supply Chains

CSA is a member-owned co-operative that provides independent supermarket retailers with centralised procurement, supply chain services, and shared solutions.



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# Structure and Operations

During FY2025, CSA's operations primarily consisted of:

## Group Procurement

conducting group procurement negotiations on behalf of members

## Commercial Arrangements

coordinating shared commercial arrangements

## Member Engagement

managing member engagement and administrative functions

## Contract Management

overseeing contracts for goods and services used by participating retailers

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# Supply Chains

CSA facilitates procurement for members through both direct purchasing and charge-through arrangements. Under these models, CSA either purchases goods and services from suppliers and makes them available to members, or administers supplier transactions on behalf of members. These arrangements cover categories including food and beverage, general merchandise, apparel, packaging, transport and logistics, maintenance, cleaning and professional services.

- ❑ In FY2025, CSA did not undertake formal supply chain mapping or collect supplier-level modern slavery data. As a result, CSA was not yet able to describe the deeper tiers of its supply chain beyond these high-level categories.

## 2. Risks of Modern Slavery Practices

CSA did not conduct a formal risk assessment in FY2025. However, based on general industry understanding of supermarket and retail supply chains, potential modern slavery risks may exist in:

### Agricultural Production

agricultural production and horticulture

### Meat & Seafood

meat processing and seafood

### Textiles & Apparel

textiles and apparel

### Manufacturing

offshore manufacturing and packaging

### Third-Party Services

third-party logistics, cleaning, and maintenance services

These potential risks relate largely to indirect suppliers and upstream tiers of supply chains that CSA had not yet examined during the reporting period.

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## 3. Governance and Actions Taken in FY2025

In FY2025, CSA did not yet have an established modern slavery governance framework, and no formal actions were undertaken to assess or address modern slavery risks. CSA also did not have a compliance officer or dedicated internal resources responsible for overseeing modern slavery obligations during this period.

### Elements Not Yet in Place

The following elements were not yet in place in FY2025:

- Ethical Sourcing Policy
- Supplier Code of Conduct
- Supplier questionnaire or self-assessment program
- Modern slavery contractual clauses
- Training for procurement staff
- Supplier mapping or risk registers
- Escalation, grievance, or remediation procedures

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# Preparatory Activities

CSA instead focused on high-level preparatory activities, including:

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## Internal Awareness

building preliminary internal awareness of obligations

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## Industry Review

informally reviewing approaches taken by industry peers

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## Scoping Requirements

scoping requirements under the Act

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## Resource Planning

identifying resources required to implement a structured program, including a future need for compliance capability

These activities were early-stage and exploratory.

## 4. Assessing Effectiveness

As CSA had no formal controls, frameworks, or supplier engagement tools in place during FY2025, no metrics were available to measure effectiveness.

### Acknowledged Gap

CSA acknowledges this gap and recognises the need to develop:

- clear supplier engagement processes
- modern slavery clauses in agreements
- risk assessment tools and registers
- baseline supply chain data
- staff training and documented responsibilities



Development of these elements commenced in FY2026.

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## 5. Consultation

During FY2025, CSA did not undertake formal consultation with members or suppliers, as no modern slavery policies, governance documents, or structured engagement processes had yet been established. Only informal internal discussions occurred within CSA as the organisation prepared for future framework development.

CSA does not own or control any other entities for the purposes of the Modern Slavery Act 2018 (Cth), and therefore no consultation with controlled entities was required during this reporting period.

In early FY2026, CSA began drafting its Ethical Sourcing Policy, Supplier Code of Conduct, Whistleblower Policy and related supplier engagement processes. As these documents were still in draft form during the reporting period, consultation with members and suppliers is expected to commence once they are finalised.

# 6. Future Commitments

Work undertaken in FY2025 informed the establishment of CSA's FY2026 governance framework. CSA's commitments include:



📌 These initiatives fall outside the FY2025 reporting period but demonstrate CSA's commitment to continuous improvement.

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## 7. Approval

This Modern Slavery Statement was approved by the Board of Co-operative Supermarkets Australia.



Terry Karkazis

Director and Chair of Co-operative Supermarkets Australia

Date: 24 December 2025