



Great Barrier  
Reef Foundation

3 November 2025

## Great Barrier Reef Foundation Modern Slavery Statement 2024-2025

### Modern Slavery Statement

This Modern Slavery Statement (**Statement**) has been prepared by the Great Barrier Reef Foundation (**Foundation**) in accordance with the *Modern Slavery Act 2018 (Cth)* (**Act**). The Foundation is committed to avoiding modern slavery in all its forms within its operations and supply chains. This Statement describes the actions the Foundation has taken during the relevant reporting period to identify, assess and manage the risk of modern slavery in operations and supply chains.

The Foundation's Board is committed to ensuring management is taking action to ensure compliance with the Act.

The term modern slavery in this Statement has the same meaning as defined under the Act. Practices that constitute Modern Slavery can include: slavery, trafficking in persons, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour (where children are subjected to slavery or similar practices or engaged in hazardous work).

The Foundation is firmly opposed to modern slavery. This Statement outlines the actions the Foundation is taking to prevent, mitigate and remedy instances of modern slavery. The Statement also describes the Foundation's commitment to understand, assess and address modern slavery risks in its operations and supply chains.

### About the Foundation

#### Operations

The Foundation is a not for profit public company limited by guarantee, incorporated under the *Corporations Act 2001* (ABN 82 090 616 443) and is registered with the Australian Charities and Not for Profit Commission (ACNC). The Foundation's mission is to create a better future for the world's coral reefs by protecting ocean habitats, restoring coral reefs and helping them adapt to the impacts of climate change. The Foundation is a collaborative organisation that raises funds, invests in innovative ideas and designs real-world, scalable conservation programs that are delivering breakthroughs in marine and terrestrial restoration. Walking in step with First Nations Peoples and front-line communities, the Foundation is fast-tracking and deploying solutions around the world.

The Foundation is based in Brisbane with small offices in Townsville and Cairns. It does not have offices outside of Australia.

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The Foundation's Annual Review provides an overview of the Foundation's annual activities and financials.

The Foundation is governed by its Board of Directors who hold responsibility for its overall governance and is the ultimate decision-making body. The Board delegates day to day management of the Foundation to the Managing Director and oversees and monitors performance of the organisation.

The Board is supported by a number of committees including the Audit, Risk and Compliance Committee, Investment and Markets Committee, Nominations Committee Portfolio and Innovations Committee Traditional Owner Advisory Committee and the Philanthropy Committee

In addition to sub-committees of the Board the Foundation program governance includes Project Boards and Advisory Committees.

The Foundation does not own or control any other entity.

## Supply Chain

The Foundation recognises the importance of understanding its supply chain and ensuring that all activities are free from modern slavery practices.

Our supply chain includes:

- Office consumables/supplies;
- Technology including computers, phones, software, printers, audio/visual equipment and data services;
- Leased office accommodation including fitouts, office furniture, property maintenance and property utilities;
- Operations including stationery, cleaning, security, courier and postal services;
- Professional services including external legal, tax advice, internal auditing, financial audit, marketing, insurance, consulting, education and professional development services;
- Travel including air and ground transport and accommodation;
- Hospitality including in-house and external catering.

The Foundation's supply chain also includes subcontractors, consultants, partners, grantees and collaborators who work with the Foundation to deliver outcomes on the Great Barrier Reef and other reefs.

The Foundation assesses all suppliers to ensure they meet compliance requirements. The Foundation is in the process of gaining a deeper understanding of how its suppliers, sub contractors, consultants, partners, grantees and

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collaborators assess and manage the risk of modern slavery in their operations and suppliers.

### **Risk Assessment and Due Diligence**

The Foundation has commenced the ongoing process of assessing the risk of modern slavery in its operations and supply chain and this process will continue as part of the Foundation's broader governance framework. This includes reviewing the practices of suppliers, subcontractors, consultants, partners, grantees, collaborators and contractors to ensure they comply with ethical and legal standards. The Foundation aims to ensure that its suppliers and partners share its commitment to eradicating modern slavery.

The risk factors considered include:

- Geographic risk;
- Product and Services risk;
- Sector and industry risk; and
- Entity risk.

The Foundation's ongoing due diligence process includes:

- Mapping supply chains to identify high risk areas;
- Assessing and ranking our suppliers based on risk factors;
- Collaborating with suppliers to ensure their compliance with our anti-slavery principles;
- Providing training to our employees to raise awareness and promote a culture of vigilance against modern slavery.

The Foundation's ongoing modern slavery risk assessment rating for operations and supply chains is low based on:

- Low Geographic Risk - majority suppliers operating in Australia. All employees are based in Australia and protected by Australia's industrial relations system;
- Low Sector Risk - provision of environmental services. Most entities are either charity based institutions with modern slavery governance or small operations in regional Queensland; and
- Low Entity Risk – majority suppliers operate under a developed governance structure and are subject to various statutory compliance obligations.

### **Actions taken to address modern slavery risks**

The Foundation engages and pays employees under National Employment Standards (NES) and according to the Fair Work Act 2009 (Cth) and relevant awards. The Foundation through its policies and procedures ensure that employees

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are not subject to adverse actions and their safety and wellbeing is in line with relevant health and safety laws.

The Foundation's procurement and contractual obligations aim to wherever possible eliminate, or mitigate modern slavery risks. The Foundation uses economically sustainable and ethical procurement and purchasing methods and strives to benefit local communities. The Foundation furthers these commitments in its Reconciliation Action Plan to use local Aboriginal and Torres Strait Islander owned business and services where possible.

The Foundation assesses and engages with all suppliers to ensure that there are no linkages to modern slavery practices and to ensure that they understand and comply with the Foundation's values and expectations. The Foundation works collaboratively to address risk and encourage continuous improvement in eradicating modern slavery from supply chains. The Foundation conducts additional due diligence where the supplier is ranked an increased risk due to geography, sector or entity risks.

The Foundation is committed to continuous improvement to better understand and manage risks associated with modern slavery in its operations and supply chain. The Foundation has an established governance framework to mitigate key risks.

**Key actions taken to address modern slavery risks during 2024-25 include:**

- Assessing the applicability and requirements of the Act
- Considering the integration and alignment of modern slavery obligations with the Foundation's existing governance framework from a risk and compliance perspective;
- Identifying, reviewing and assessing modern slavery risks within the Foundation's operations and supply chain;
- Identifying any risks to be addressed as a priority;
- Embedding measures to address modern slavery in the corporate governance framework;
- Addressing modern slavery risks in the Foundation's risk register and compliance register.
- Modern Slavery risk assessment of each supplier;
- Training to all staff.
- Procurement process includes mitigation of modern slavery.
- The Foundation's standard contracts include a requirement that any suppliers or their subcontractors do not procure, engage in or use services that have any connection with modern slavery. Breach of this clause requires immediate notification to the Foundation.

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The Foundation has not been made aware of any modern slavery risks in its operational or supply chains. No remediation processes have been engaged. The Foundation encourages all staff to be aware, through training and reporting any instances of modern slavery connections.

#### **Futures actions in 2025- 2026 include:**

- Board approve a Modern Slavery Policy to eliminate or mitigate the risk of Modern Slavery in the supply chain;
- Continue annual Modern Slavery training for all staff
- Implement a requirement for training of high risk suppliers
- Work with Delivery Partners where necessary to ensure they are aware of Modern Slavery requirements.

#### **Effectiveness of actions taken by the Foundation**

The commitment to elimination of modern slavery is ongoing at the Foundation. As part of its risk management and compliance processes, the Foundation is constantly improving its systems and presents the risk and compliance registers at quarterly ARCC meetings.

The Foundation provides Modern Slavery reporting to the Board on an annual basis.

The Foundation will conduct annual assessments of all suppliers and in particular any that are considered high risk will include improved due diligence to ensure that their operations and supplier chains are modern slavery free.

#### **Conclusion**

The Foundation is dedicated to upholding high ethical standards and ensuring modern slavery has no place in our operations or supply chains. This Statement reflects our ongoing commitment to transparency, responsibility and the protections of human rights. Through our actions, policies and collaborations we aim to make a positive impact on our society and contribute to a world free from modern slavery.

This Modern Slavery Statement was approved by the Foundation's Board on 3 November 2025.

**Dr Martin Parkinson AC PSM**  
Board Co-Chair

**David Thodey AO**  
Board Co-Chair

**Anna Marsden**  
Managing Director