



MODERN

SLAVERY

GERALDTON FISHERMEN'S CO-OPERATIVE

STATEMENT

Message from the CEO

The Geraldton Fishermen's Co-operative is pleased to be submitting our first Modern Slavery Statement in accordance with Modern Slavery Act 2018 (cth).

At the Geraldton Fishermen's Co-operative, we believe and advocate that freedom from slavery is a fundamental human right. We are committed to the UN Guiding Principles on Human Rights, and as a socially responsible business take efforts to act accordingly in respecting human rights in our operations and supply chains.

This commitment includes building a continued understanding of Modern Slavery in all its forms and taking action to prevent, mitigate, and where appropriate, remedy Modern Slavery in our operations and supply chains.. It's important to the Geraldton Fishermen's Co-operative that now, and into the future we build policies and procedures and act to ensure we work responsibly and partner only with those who share similar standards in ethical integrity.

Geraldton Fishermen's Co-operative is a co-operative of fishing families and the world's largest rock lobster exporter. It supports fishers, employees, licence holders, and their families along a thousand kilometres of WA's coastline. Geraldton Fishermen's Co-operative is operated for the benefit of its members and the communities in which it operates. Our co-operative of fishers is the custodian of the Brolos brand and is committed to quality and sustainability. We're a values-led organisation that positively benefits our members, staff, partners, and the communities we live and operate in. Our unwavering focus on quality and innovation underpins our commitment to meeting our customer's needs.

This Statement has been prepared under the 'Guidance for Reporting Entities' provided by the Commonwealth Government and submitted to the Australian Border Force for publication pursuant to Section 16 (1) of the Modern Slavery Act. The Statement was approved by the board of the Geraldton Fishermen's Co-operative as the primary reporting entity and proprietor of the named entities covered in the report, on 20 November 2024.



Marc Anderson
Geraldton Fishermen's Co-operative
Chief Executive Officer



Basil Lenzo
Geraldton Fishermen's Co-operative
Chair

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1. Introduction

1.1. Purpose

This document formalises Geraldton Fishermen's Co-operative Ltd. (GFC)'s commitment to addressing modern slavery risks within its operations and supply chains, in full compliance with the Modern Slavery Act 2018. As a responsible corporate entity, GFC recognises the profound ethical and legal implications of modern slavery and is dedicated to upholding human rights across all facets of its operations. Our commitment extends to ensuring that our business practices and supply chains are free from any form of modern slavery, including forced labour, human trafficking, and exploitation.

This is GFC's first modern slavery statement, marking the beginning of our journey toward a more comprehensive understanding and mitigation of modern slavery risks within our operations and supply chains. We acknowledge that this is just the initial step, and we are committed to continually enhancing our practices and frameworks. Recognising the complexity and evolving nature of modern slavery issues, we understand that more work is needed to fully understand and act on these challenges. We are dedicated to ongoing learning, engagement, and improvement to ensure our commitment to ethical practices is upheld at all levels of our business.

1.2. Objectives

GFC is dedicated to working collaboratively with our employees, members, suppliers, and the broader community to eradicate modern slavery and uphold the highest standards of human rights. As such, GFC's objectives for combating Modern Slavery Risks are:

- **Developing Awareness:** GFC is committed to raising awareness about modern slavery risks among our employees, members, and suppliers. We believe that education and awareness are critical first steps in combating modern slavery.
- **Implementing Frameworks:** To manage modern slavery risks effectively, GFC is developing robust frameworks that integrate ethical considerations into our business practices. This includes implementing comprehensive policies and procedures that promote transparency and accountability throughout our supply chains. Our frameworks will be designed to not only comply with legal requirements but also to reflect our commitment to ethical business conduct and respect for human rights.
- **Taking Action:** GFC is committed to taking proactive and meaningful action to combat modern slavery. This includes implementing immediate measures to address identified risks, working closely with suppliers to improve labour practices, and ensuring swift and effective responses to any incidents of modern slavery. We will continuously review and enhance our actions to ensure they are effective and aligned with best practices in the industry.

By formalising these objectives, GFC aims to foster a culture of integrity and ethical responsibility. We are dedicated to working collaboratively with our employees, members, suppliers, and the broader community to eradicate modern slavery and uphold the highest standards of human rights. This statement reflects our unwavering commitment to ethical business practices and our proactive stance in preventing and addressing modern slavery risks within our sphere of influence.

1.3. Scope

This Statement covers the reporting entity Geraldton Fishermen's Co-operative Ltd (ABN: 52 425 663 385) trading as Geraldton Fishermen's Co-operative, and its subsidiaries.

2. GFC Business Structure, Operations & Supply Chain

2.1. About GFC

Geraldton Fishermen's Co-operative (GFC) was established in 1950 as a member owned, fully distributing co-operative. Since it was established, Geraldton Fishermen's Co-operative has led the industry, working closely with fishermen, Western Australia's Department of Fisheries, and other rock lobster processors and management bodies to ensure the careful, continued governance of our fishery.

As a co-operative, our co-operative principles deeply inspire and guide our commitment to being leaders in ethical business practice. These principles emphasise democratic member control, concern for community, and ethical responsibility, fostering a culture where fairness, transparency, and respect for human rights. Our dedication to these co-operative ideals not only strengthens our integrity but also drives us to champion the fight against modern slavery, ensuring a sustainable and just future for all stakeholders involved.

2.2. Governance

Geraldton Fishermen's Co-Operative Ltd. is governed by a board of directors, made up of six member elected fisher directors and two independent directors, nominated by the board.

The Board are responsible for appointing a Chief Executive Officer, who leads the Executive Team in its responsibility for all aspects of the businesses.

GFC implements a Risk and Governance Framework which includes:

- Risk Management Policy
- Risk Management Framework
- Risk Appetite Statement
- Corporate Risk & Compliance Register
- Regular reports to the Board of Directors

2.3. Operations

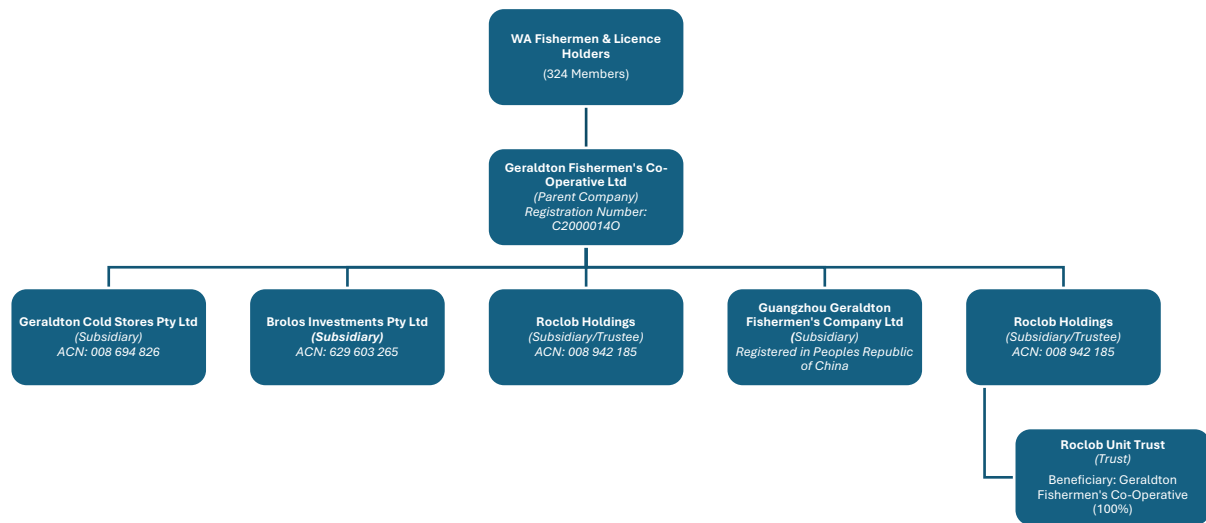
GFC's primary activity is supply chain logistics, processing, marketing and exporting of Western Rock Lobster products on behalf of our members. These activities take place along the Western Australian coastline at beach landings, holding facilities, road transport vehicles, processing facilities and export facilities in regional areas and the Perth Metro area.

GFC employs approximately 70 permanent staff and between 200 to 350 casual workers, all of whom are recruited from local labour pools. Before employment, all employees undergo a thorough assessment to ensure full working rights. Compensation for all employees is aligned with industry benchmarks or the relevant Modern Award for their roles. GFC does not participate in labour mobility schemes and does not employ migrant workers through these programs, which are identified by the Global Slavery Index (GSI) as a high-risk group for modern slavery.

2.4. Subsidiaries

GFC has several fully owned subsidiaries as shown on Figure 1. Most notably, Brolos Investments, which operates several retail and marine service facilities under the direct management of the GFC Executive. For the purpose of this statement, all subsidiary business activity has been combined with GFC business activity.

Figure 1 – Geraldton Fishermen's Co-operative Ltd Group Structure



2.5. Brand

GFC sells live and frozen lobster products under the Brolos brand to international and domestic customers. GFC also sells small quantities of other fish products and marine service products to domestic customers.

2.6. Suppliers - WRL Fishers

GFC's main supplier is fisher members who supply around 4,500 tonnes of wild caught Western Rock Lobster from the quota-controlled fishing zones that make up the Western Rock Lobster Fishery, each year. The Western Rock Lobster (WRL) fishery itself is renowned globally for its exceptional sustainability, underscored by being the first fishery to achieve and maintain certification under the Marine Stewardship Council (MSC). This certification reflects the fishery's adherence to the highest standards of environmental stewardship, sustainable fishing practices, and effective resource management.

GFC fisher members operate as independent suppliers to GFC but as members, they are bound by the GFC Constitution and Catch Delivery Agreement.

2.7. Suppliers - Non-WRL Fishers

GFC receives small quantities (relative to WRL) of other fish products from fishers in Western Australia, and wholesalers across Australia. This includes:

- Abalone
- Octopus
- Crab
- Prawns
- Scallops

2.8. Suppliers - Bait Supply

GFC sources and supplies bait to its fisher members each year. This bait includes whole fish and fish heads which are sourced from suppliers in Australia and New Zealand.

2.9. Importing risk

GFC sources a variety of equipment, ingredients, packaging, wrapping and other manufacturing inputs for use in seafood processing activities. Through its subsidiary, Brolos Investments, GFC also sources a wide variety of marine service products for sale through its Marine Store. Although these suppliers are all within Australia, there is risk of importing from global supply chains.

3. Identifying & Assessing Modern Slavery Risk

3.1. High Risk Areas

The Global Slavery Index (GSI) identifies the fishing industry as one of the highest-risk sectors worldwide. Within this industry, several areas are particularly vulnerable to modern slavery, including bait supply, vessel operations, and seafood processing.

Sea freight has also been identified as a high-risk area for modern slavery. The sector's complexity, involving a high volume of workers for tasks such as navigation, loading, unloading, and repairs across multiple countries, makes it particularly susceptible to modern slavery risks.

Of these areas, seafood processing is a direct part of GFC's operations, while vessel operations, bait supply and sea freight are within the upstream/downstream supply chain.

This statement focuses exclusively on assessing the high-risk areas of modern slavery.

3.2. Risk Assessment Methodology

GFC used primary data from the Global Slavery Index¹ to assess the inherent risk of Modern Slavery within its operations and supply chain. GSI country data was used to assess the inherent risk for each element, including:

- Prevalence of Modern Slavery (number per 1,000 people).
- Vulnerability (score out of 100).
- Government response (score out of 100).

A final residual risk rating of Low, Medium, or High was determined for each element, taking into consideration the inherent risk and any existing controls or mitigating factors.

3.3. Residual Risk Ratings

Table 1 - GFC Business Risk Factors

Element	Country	Inherent risk	Other factors	Residual Risk
Seafood Processing	Australia	Low	MSC Certification, Right to Work Compliance, Modern Award Compliance, Payroll Audit,	Low

The residual risk of modern slavery within GFC's business activities has been assessed as LOW. This evaluation took into account Australia's Global Slavery Index (GSI) scores and the measures GFC has implemented to ensure fair treatment of workers. Additionally, GFC does not employ migrant workers on temporary migration visas, a group identified as having the highest risk of modern slavery in Australia.

Table 2 – Upstream Supply Chain Risk

Item	Country	Inherent Risk	Other factors	Residual Risk
Bait Supply	Australia	Low	NIL	Low

Bait Supply	NZ	Low	NIL	Low
WRL Fishing	Australia	Low	MSC Certification	Low

The residual risk of modern slavery within GFC's upstream supply chain has been determined to be LOW. This evaluation took into account the favourable Global Slavery Index (GSI) scores for Australia and New Zealand and the MSC Certification for the Western Rock Lobster (WRL) Fishery.

Table 3 – Downstream Supply Chain Risks

Item	Country	Inherent Risk	Mitigating factors	Residual Risk
Sea Freight	Various	Medium	AMSA Governance	Medium

The residual risk of Modern Slavery within GFC's downstream supply chain was determined to be MEDIUM. This evaluation considered the Global Slavery Index (GSI) scores for the flag state of shipping vessels used by GFC, and the lack of any existing mitigating factors or controls.

4. Mitigation Actions

4.1. Previous actions

This is GFC's first Modern Slavery Statement, and as such, there are no existing actions in progress.

4.2. Planned actions for 2025

The GFC management team and board have agreed on the following actions for 2024-2025:

- Provide Modern Slavery Awareness Training for the board, executive and key management staff.
- Develop a Modern Slavery Questionnaire & Commitment Statement as part of the Approved Supplier Process.
- Distribute the Modern Slavery Questionnaire & Commitment Statement to all current Approved Suppliers.
- Communicate with members about Modern Slavery Risks, Compliance Requirements and actions being taken by GFC.
- Develop awareness of Modern Slavery Risks with GFC stakeholders through corporate communication channels (internal newsletters, social media, member communications).
- Review GFC policies and procedures to ensure consistency in our endeavours to address potential or identified modern slavery risks across the business.
- Develop a remediation framework that can be applied to an identified instance within our supply chain.

4.3. Future Goals & Modern Slavery Roadmap

The GFC management team and board have identified the following future goals to combat potential Modern Slavery within our supply chain:

- Expand the scope of the Downstream and Upstream Modern Slavery Risk Assessment to include all suppliers.
- Expand the scope of the Approved Supplier Process to include all upstream and downstream suppliers (except Fisher Members).

- Update the GFC Catch Delivery Agreement to include a commitment from fisher members to combat Modern Slavery Risks within their business.
- Develop awareness of Modern Slavery Risks within the WRL industry through advocacy and member engagement.
- Develop and framework to allow for random auditing by GFC of suppliers and areas of identified risk.

5. Assessing effectiveness

5.1. Previous actions

This is GFC's first Modern Slavery Statement, and as such, there has been no evaluation of Modern Slavery Risk Mitigation effectiveness.

5.2. Planned actions and future goals

To evaluate effectiveness of actions outlined in this statement, GFC will monitor and report on the following key metrics:

- Percentage of Approved Suppliers who complete the Modern Slavery Questionnaire & Commitment Statement.
- Percentage of employees who complete the Modern Slavery Awareness Training.
- Engagement metrics for communications about Modern Slavery Topics.

6. Consultation

As noted in section 2.4, GFC subsidiaries are under the direct management of GFC, and consultation with Brolos Investments was achieved through:

- Direct stakeholder meetings with responsible managers and executives.
- Evaluation of Brolos Investments business data alongside GFC business data.
- Joint risk assessment activities to consider Brolos Investment supply chain risks alongside GFC supply chain risks.

7. Other relevant information

7.1. Co-Operative Principles

Co-operatives are based on the values of self-help, self-responsibility, democracy, equality, equity, and solidarity. In the tradition of their founders, co-operative members believe in the ethical values of honesty, openness, social responsibility and caring for others. The co-operative principles are guidelines by which cooperatives put their values into practice.

1. Voluntary and Open Membership

Co-operatives are voluntary organisations, open to all persons able to use their services and willing to accept the responsibilities of membership, without gender, social, racial, political or religious discrimination.

2. Democratic Member Control

Co-operatives are democratic organisations controlled by their members, who actively participate in setting their policies and making decisions. Men and women serving as elected representatives are accountable to the membership. In primary co-operatives, members have equal voting rights (one member, one vote) and co-operatives at other levels are also organised in a democratic manner.

3. Member Economic Participation

Members contribute equitably to, and democratically control, the capital of their co-operative. At least part of that capital is usually the common property of the co-operative. Members usually receive limited compensation, if any, on capital subscribed as a condition of membership. Members allocate surpluses for any or all of the following purposes: developing their co-operative, possibly by setting up reserves, part of which at least would be indivisible; benefiting members in proportion to their transactions with the co-operative; and supporting other activities approved by the membership.

4. Autonomy and Independence

Co-operatives are autonomous, self-help organisations controlled by their members. If they enter into agreements with other organisations, including governments, or raise capital from external sources, they do so on terms that ensure democratic control by their members and maintain their co-operative autonomy.

5. Education, Training, and Information

Co-operatives provide education and training for their members, elected representatives, managers, and employees so they can contribute effectively to the development of their co-operatives. They inform the general public - particularly young people and opinion leaders - about the nature and benefits of co-operation.

6. Cooperation among Co-operatives

Co-operatives serve their members most effectively and strengthen the cooperative movement by working together through local, national, regional and international structures.

7. Concern for Community

Co-operatives work for the sustainable development of their communities through policies approved by their members.

7.2. GFC Company Values

Our staff adhere to the following five values in everything that we do:

- **Safety:** The health and safety of our staff, visitors, and contractors is our number one priority.
- **Quality:** We produce the best products, services, and support for our members and clients. We value a strong and sustainable fishery and industry. The health and vigour of our lobster is maintained at all times.
- **Productivity:** We aim for maximum productivity and lowest cost, without compromising on safety or quality.
- **Respect:** We treat others as we would like to be treated, and we act with integrity at all times.
- **Continuous Improvement:** We constantly strive for improvement and innovation in all areas, in order to maximise return to members.

Appendix 1 – Modern Slavery Criteria Mapping

Criteria	Document section	Compliant
1. Identify the reporting entity	2. About GFC	✓
2. Describe the entity's structure, operations, and supply chains	2. About GFC	✓
3. Describe the risk of modern slavery practices	3. Identifying & Assessing Modern Slavery Risk	✓
4. Describe actions taken to access and address modern slavery risks	4. Mitigation Actions	✓
5. Assess the effectiveness of actions taken	5. Assessing effectiveness	✓
6. Describe the consultation process	6. Consultation	✓
7. Provide any other relevant information	7. Other Relevant Information	✓