

Warrigal

Modern Slavery **Statement**

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Criteria 1: Warrigal’s Structure

About Warrigal

Warrigal is a purpose-driven aged care provider proudly serving communities across New South Wales and the Australian Capital Territory. With deep roots in the Illawarra, Southern Highlands, Goulburn, Queanbeyan, and the ACT, Warrigal has grown to become a trusted name in aged care, known for its commitment to dignity, respect, and personalised support.

Our services span a wide continuum of care, including:

- Residential aged care homes for older people who require daily support and clinical care.
- Independent living villages that foster autonomy and community connection.
- Home care services tailored to individual needs, enabling older people to remain in their own homes with confidence.
- Specialised programs such as dementia care, palliative care, and day respite services.

At the heart of Warrigal is a dedicated team of over 2000 staff and volunteers, all working together to create environments where older people feel known, loved and connected. Our operations are guided by a volunteer Board of Directors and an experienced executive team, ensuring that every decision reflects our values and vision.

Warrigal’s approach is grounded in compassion, innovation, and collaboration—with older people, their families, and our broader community. We are continually evolving to meet the changing needs of those we serve, while upholding the highest standards of care and ethical practice

Structure

Legal Name	Warrigal Care Limited
Australian Company Number (ACN)	002 392 636
Australian Business Number (ABN)	34 002 392 636
Type of Entity	Australian Public Company, Limited by Guarantee
Registered Office Address	Level 2/10 Pioneer Drive Oak Flats NSW 2527
Date of Registration	16 th March 1982
Business Names Used	Warrigal
Other entities owned or controlled by Warrigal Care	None



Warrigal Care Limited is registered as a company with the Australian Charities and Not-Profit Commission (ACNC).

Approval of this Statement

This statement has been presented to the Board of Directors as a stand-alone document for their review and approval. The Board of Directors approved this document at their monthly Board meeting on the 24th of November 2025 and submitted the statement to be signed by or Chair of the of the Board.



Signed by Sophie Ray

Chair of the Board

24th November 2025

Criteria 2: Warrigal Operations and Supply Chain

Warrigal is a not-for-profit organisation operating across the Illawarra and Southern Highlands regions of New South Wales, as well as in Goulburn, Queanbeyan, and the Australian Capital Territory (ACT). Our mission is to support older Australians to live their best lives, and we do so through a diverse range of aged care services tailored to meet varying levels of need.

During the 2024–2025 financial year, Warrigal managed **13 residential aged care homes**, providing full-time accommodation and comprehensive support for older individuals who are no longer able to live independently. These services include daily personal care, nutritious meals, hospitality, and a safe, welcoming environment designed to promote wellbeing and dignity.

In addition, Warrigal operated **12 community and lifestyle villages**, where residents maintain independent living within supportive and socially connected communities. These villages offer a range of amenities and services that encourage active ageing and autonomy.

A significant part of Warrigal's operations is **Home Care**, which delivers tailored in-home support to customers throughout the Illawarra and Southern Highlands. These services range from basic assistance with daily tasks to more complex care needs, allowing individuals to remain in their own homes for as long as possible.

Warrigal also provides **day respite programs**, giving carers a break while offering engaging activities and social interaction for older people. Furthermore, we offer **specialised services** in



palliative care and dementia support at several of our locations, ensuring compassionate and expert care for those with advanced or complex needs.

Our workforce comprises over 2,000 dedicated employees, supported by a passionate team of more than 500 volunteers, all working together to deliver high-quality care and support across our services.

Warrigal's Supply Chain

Warrigal maintains a broad network of suppliers and contractors who support our operations across all facets of aged care service delivery. These partnerships are essential to ensuring that we consistently provide high-quality care and services to our residents and clients.

For larger contracts, Warrigal engages in formal tendering processes to ensure transparency, competitiveness, and alignment with our standards. Successful tenderers enter into structured agreements that clearly define expectations around service quality, product standards, compliance, and performance monitoring. These agreements help us maintain consistency and accountability across our supply chain.

Several years ago, Warrigal made a strategic decision to outsource specific operational areas where external expertise could enhance service delivery and improve outcomes for residents. This approach has allowed us to focus more closely on our core mission while leveraging the capabilities of specialist providers.

As a result, Warrigal now works with a range of contractor partners across key service areas including Property and Facilities Management, Allied Health Services, Cleaning, and Catering. These partnerships are carefully managed to ensure they align with our values and contribute positively to the wellbeing of those in our care.

By fostering strong, collaborative relationships with our suppliers and contractors, Warrigal continues to uphold high standards of care and operational excellence throughout our organisation.

Criteria 3: Identification of Modern Slavery Risks with our Operations and Supply Chain

Warrigal is committed to upholding ethical and responsible business practices, and we take the risk of modern slavery seriously across all aspects of our operations. This commitment is a key consideration when engaging with suppliers and contracting partners, particularly in sectors known to carry higher risks.

We understand that our ability to influence the broader supply chain diminishes beyond the initial tiers of direct suppliers. However, we actively seek to mitigate potential risks through a robust supplier selection and procurement process. This includes conducting due diligence, assessing supplier practices, and prioritising partnerships with organisations that demonstrate a clear commitment to ethical sourcing and labour standards.

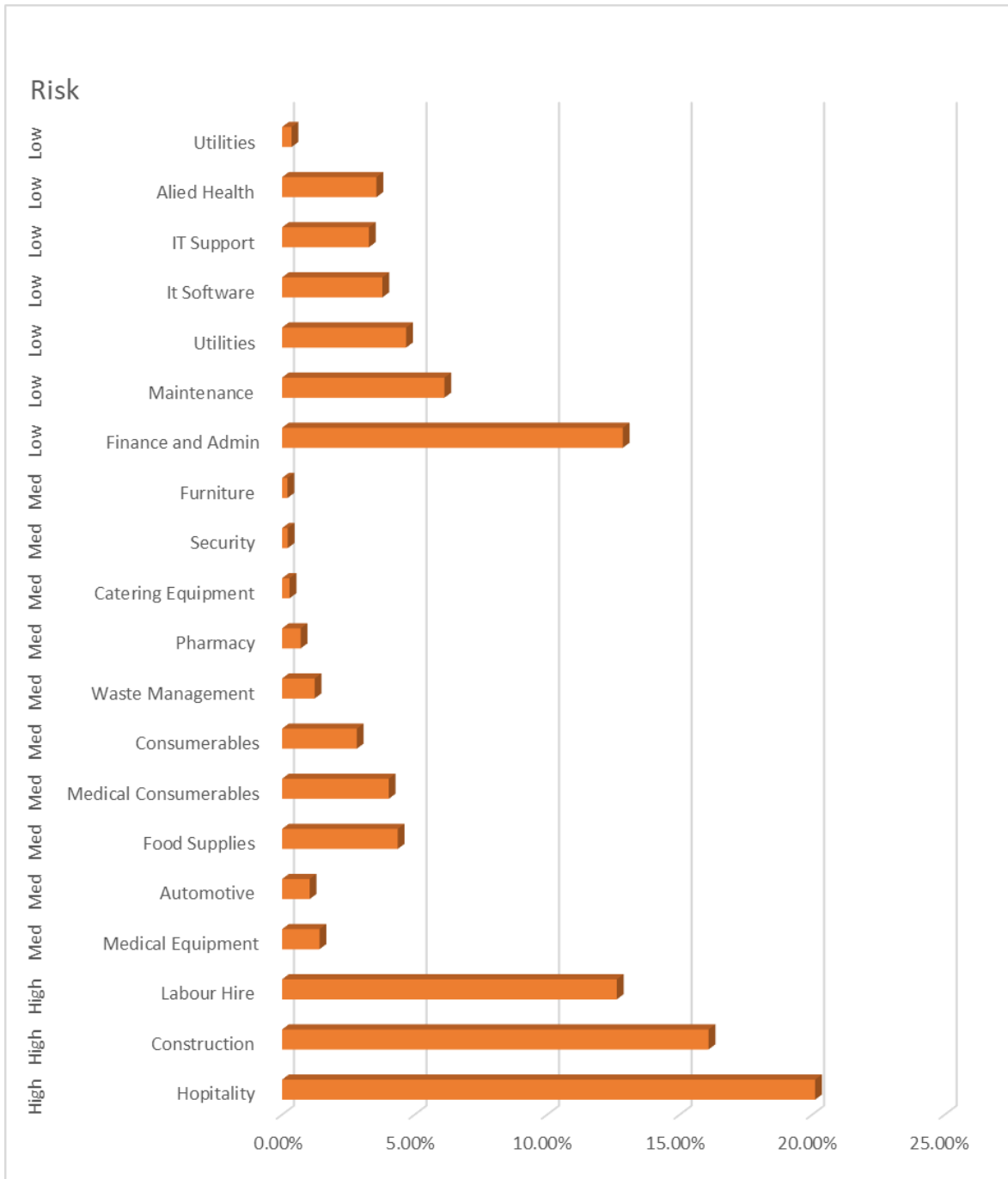


To support our risk management efforts, Warrigal has developed a categorisation framework for our suppliers. This framework enables us to analyse and compare our expenditure across different supplier groups, particularly in relation to industries traditionally associated with higher risks of modern slavery—such as cleaning, catering, construction, and certain imported goods.

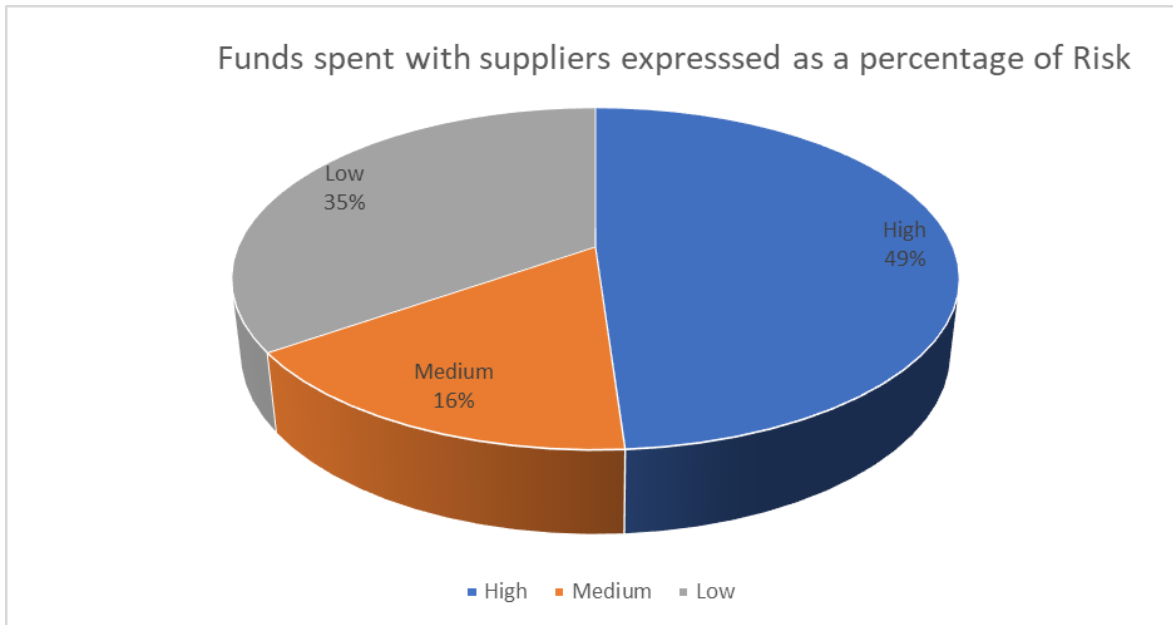
The accompanying chart provides a visual breakdown of our supplier categories and highlights the proportion of our total spend allocated to each. This allows us to monitor exposure to potential risk areas and informs our ongoing efforts to strengthen transparency and accountability within our supply chain.

This chart illustrates the distribution of Warrigal's supplier expenditure across various categories, grouped by their assessed risk level in relation to modern slavery. The percentages reflect the proportion of total spend allocated to each category, helping to identify areas with potentially higher exposure to risk.





The following chart illustrates Warrigal's expenditure across its top 100 suppliers, grouped into three modern slavery risk categories: High, Medium, and Low. Each segment represents the proportion of total spend attributed to suppliers within that risk level. This breakdown provides a clear view of where the greatest financial exposure aligns with higher-risk areas, enabling Warrigal to prioritise due diligence and implement targeted risk mitigation strategies.



Addressing Modern Slavery Risk

Warrigal is committed to preventing modern slavery within our operations and supply chain. For our internal workforce, we operate under Enterprise Bargaining Agreements (EBAs) negotiated in consultation with relevant unions. These agreements, supported by comprehensive policies on Human Resources, Work Health & Safety, and Bullying & Harassment, ensure fair and ethical employment practices. We actively encourage feedback from staff at all levels, fostering transparency and accountability. Given these measures and the caring nature of our industry, we consider the risk of modern slavery within our own workforce to be very low.

Our supply chain presents a more complex challenge. Warrigal manages a large network of suppliers through a dedicated procurement team, which oversees all purchasing and contractor management. This centralised approach allows for close collaboration, streamlined decision-making, and strong supplier relationships. To strengthen oversight, we also engage a third-party Contractor Management Company, which assists in monitoring contractor compliance, staff qualifications, and insurance coverage.

To better understand and mitigate risk, we have identified our top 100 suppliers by spend and assessed them against sectors commonly associated with modern slavery risk in Australia. Our analysis indicates that construction, hospitality, and third-party labour hire for nursing represent the highest potential risk areas. While Warrigal sources all goods and services from Australian-based suppliers, we acknowledge that some of these suppliers may rely on imported products or subcontracted services from regions with elevated risk profiles.



As part of our proactive approach, Warrigal distributed a Modern Slavery Risk Questionnaire to a number of key suppliers in 2025. This initiative has helped us to gauge our suppliers' internal practices, supply chain transparency, and commitment to ethical standards. Their responses will inform our ongoing risk assessment and guide future engagement strategies.

Although our agreements and tender processes align us with companies that uphold ethical labour standards, we recognise that residual risk may exist deeper within the supply chains of our contractors and suppliers. This awareness drives our commitment to continuous monitoring, supplier engagement, and improvement in procurement practices.

Modern Slavery Questionnaire Summary

As part of Warrigal Care's commitment to ethical sourcing and compliance with the Modern Slavery Act 2018, a questionnaire was distributed to 43 of our top 100 suppliers by spend. The purpose was to assess supplier awareness, policies, and practices related to modern slavery risks. The responses help us assess potential risk areas, strengthen our due diligence processes, and identify opportunities for collaboration to reduce modern slavery risks.

The following data summarises the findings from this questionnaire:

Category	Percentage / Proportion	Comment
Total Suppliers (Top 100)	100%	Represents Warrigal's top 100 suppliers by annual spend.
Suppliers Surveyed	43%	43 of the top 100 suppliers were invited to participate in the survey.
Response Rate (of Suppliers Surveyed)	56%	24 of the top 100 suppliers provided responses.
Spend Coverage – Suppliers Surveyed	73.5%	Portion of total spend represented by suppliers who received the survey.
Spend Coverage – Suppliers Responded	36.8%	Portion of total spend represented by suppliers who provided responses.
Response Rate (by Total Spend)	37%	Share of total supplier spend covered by responses received.



Key Findings from Respondents

Supplier is subject to the Modern Slavery Act	12.5%	3 Suppliers
Have conducted Responsible Sourcing audits	12.5%	3 Suppliers
Have issued audit certificates	12.5%	3 Suppliers
Have Modern Slavery Statements in place	45.8%	11 Suppliers
Have allocated staff responsible for overseeing Modern Slavery risk within the organisation	50.0%	12 Suppliers
Provide their staff with training on Modern Slavery Risk	41.7%	10 Suppliers
Conduct Supplier screening	45.8%	11 Suppliers
Due diligence in place	29.2%	7 suppliers
Conduct business in high risk countries	16.7%	4 Suppliers
Deal in high-risk products	25.0%	6 suppliers
Have reported incidents or suspected incidents by staff	0.0%	Zero
Have additional controls in place	37.5%	9 Suppliers

Observations

While a significant portion of spend is covered by respondents, there is room to improve response rates and engagement. Most respondents demonstrate awareness and have foundational controls in place, such as policies, training, and supplier screening. Continued focus is needed on supplier due diligence and monitoring of high-risk supply chains

Criteria 4: Actions to Address Risk

Warrigal is committed to reducing the possibility of modern slavery within our organisation and across our supply chain. To achieve this, we have implemented a series of proactive measures designed to strengthen oversight, improve transparency, and promote ethical practices. These actions focus on both internal operations and external supplier engagement, ensuring that our approach is comprehensive and aligned with best practice standards. The following initiatives outline the steps Warrigal has taken to identify, assess, and mitigate modern slavery risks.

- Listed our top one hundred suppliers based on spend amounts and categorised them as Low, Medium or High-risk suppliers.
- Appointed an Executive to oversee the Modern Slavery risks and mitigation strategies.
- Board and Senior Management Awareness.
- Appointed a Senior Procurement Manager to guide supplier engagement with focus on Ethical Procurement.



- Distributed a Modern Slavery questionnaire to a percentage of our largest suppliers to gauge possible risks within their organisations.
- All Warrigal drafted agreements now include a Modern Slavery clause which requires suppliers to abide by the Modern Slavery Act 2018 and assist Warrigal with our reporting obligations.
- Increased engagement with our major suppliers.

Managing High Risk Relationships

Although several of Warrigal's suppliers operate within industries traditionally classified as high risk for modern slavery—such as hospitality, construction, and labour hire—we actively partner with organisations that share our values of fairness, dignity, and ethical practice. These suppliers typically operate under industry awards or EBAs and maintain robust policies and procedures to protect workers' rights. This alignment significantly reduces Warrigal's overall modern slavery risk rating within our supply chain and reinforces our commitment to responsible and transparent procurement.

This approach complements our broader risk management framework, including supplier questionnaires and ongoing risk assessments, ensuring that we maintain visibility and accountability across all tiers of our supply chain.

Mitigating the Modern Slavery Risk

Warrigal is committed to reducing the risk of modern slavery within our operations and supply chain. For our internal workforce, we believe the likelihood of modern slavery is extremely low due to the strong safeguards we have in place. These include EBAs negotiated with unions, comprehensive Human Resources policies, and a Whistle-blower Policy that encourages staff to report concerns confidentially. Combined with our organisational culture of care and respect, these measures provide a robust framework for ethical employment practices.

In relation to our supply chain, Warrigal seeks to mitigate risk by partnering with reputable suppliers who share our commitment to ethical standards. All supplier agreements explicitly require compliance with the Modern Slavery Act 2018, and suppliers must cooperate with Warrigal by providing information and responding to due diligence requests. To strengthen this process, Warrigal has distributed a Modern Slavery Risk Questionnaire to a number of key suppliers. This initiative helps us assess their internal practices, supply chain transparency, and commitment to ethical labour standards. The insights gained from these responses inform our risk management strategies and guide future engagement.

While our agreements and tender processes align us with companies that uphold ethical labour standards, we acknowledge that residual risk may exist deeper within the supply chains of our contractors and suppliers. This awareness drives our commitment to continuous monitoring, supplier engagement, and improvement in procurement practices.



Criteria 5: Effectiveness Assessment

To ensure Warrigal's strategy for managing modern slavery risk remains effective and aligned with best practice, we have committed to a program of continuous improvement. Our approach includes:

- Ongoing engagement with suppliers – maintaining open communication with both new and existing partners to reinforce expectations and share updates.
- Mandatory risk questionnaires – requiring suppliers to complete a Modern Slavery Risk Questionnaire as part of proposal submissions, helping us identify potential vulnerabilities early.
- Regular review of screening tools – assessing completed questionnaires from new and existing suppliers to monitor compliance and risk indicators.
- Integration into procurement decisions – embedding modern slavery risk considerations into our tender evaluation matrix to ensure ethical sourcing remains a priority.
- System and process reviews – evaluating existing business systems against legislative requirements to maintain compliance and transparency.
- Education and awareness – continuing to involve different areas of the business in training and discussions to strengthen knowledge of risks and mitigation strategies.
- Monitoring feedback channels – reviewing internal and external feedback for any indicators of modern slavery concerns.
- Commitment to improvement – reiterating our stance on modern slavery to all suppliers and striving for ongoing enhancements in our risk management practices.

Criteria 6: Consultation with other entities owned or controlled by Warrigal

Warrigal does not own or control any subsidiary entities. As a result, there are no affiliated organisations requiring consultation under the Modern Slavery Act 2018 reporting guidelines. All modern slavery risk management activities, policies, and procedures are developed and implemented centrally within Warrigal. This centralised approach aids accountability by ensuring consistent application of standards and clear responsibility for compliance across the organisation.

Criteria 7: Other relevant information

Warrigal was founded by volunteers with a mission to support vulnerable members of the community, and we remain dedicated to our core philosophy of treating people with dignity and respect. This commitment extends beyond the care we provide—it shapes every aspect of our operations, including how we manage our supply chain. We are committed to safeguarding human rights and ensuring lawful, fair, and ethical work practices throughout our organisation. In line with this, we expect all service providers, suppliers, and contractors to share these values and actively work to prevent modern slavery within their own operations and supply chains.

When the Modern Slavery Act reporting requirements were first introduced, Warrigal participated in collaborative networking sessions with other aged care providers. These discussions helped build a shared understanding of the legislation and fostered a collective approach to ethical procurement practices across the sector.



To strengthen our approach, Warrigal has implemented risk assessment processes that include identifying high-risk categories, reviewing supplier practices, and conducting due diligence checks. We have also introduced a Modern Slavery Risk Questionnaire for key suppliers to evaluate their internal controls and supply chain transparency. These measures allow us to monitor compliance, identify potential vulnerabilities, and take proactive steps to mitigate risk.

