

# MODERN SLAVERY STATEMENT

DECEMBER 2022

**Whiddon**

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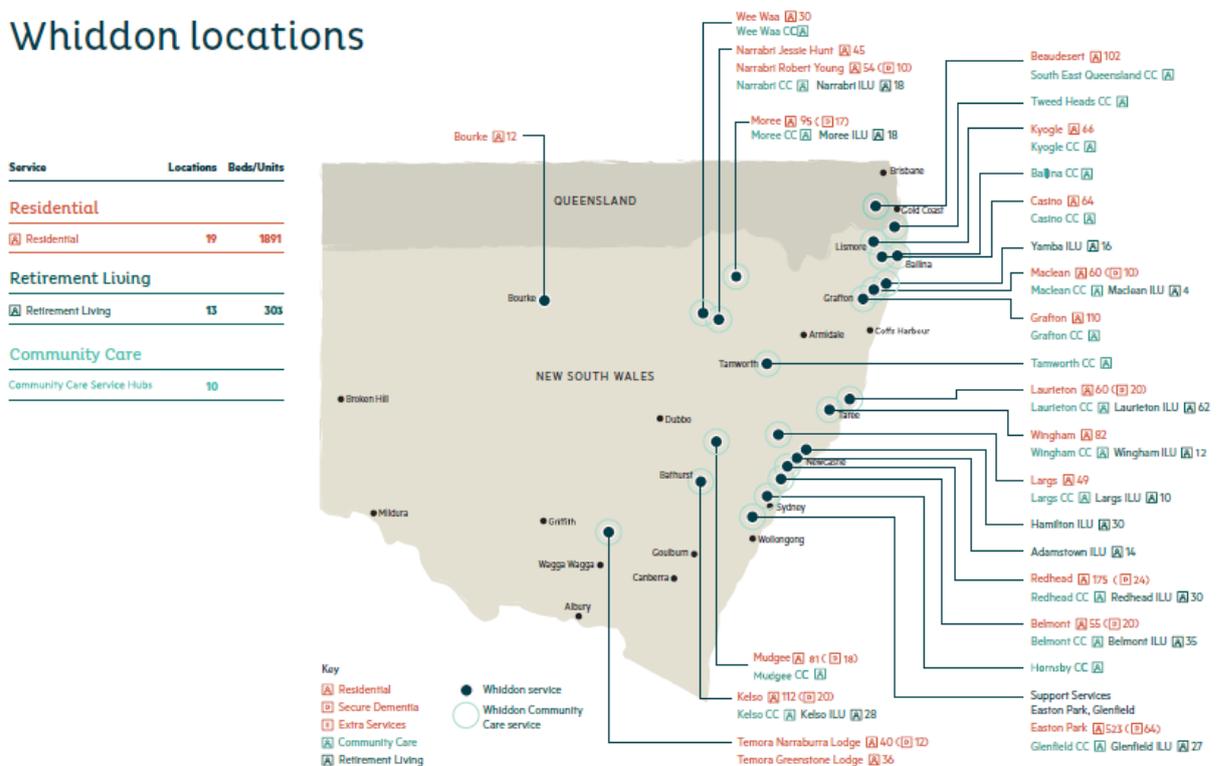
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## About Whiddon

Whiddon has been providing exceptional care to older Australians across regional, rural and remote NSW and QLD for more than 75 years. From our philanthropic beginnings, we have grown into a large not-for-profit organisation with more than 2,600 customers and over 2,600 people. We're an award-winning aged care provider with residential care, community care and retirement villages across New South Wales and Queensland.

Our strong presence in regional, rural and remote NSW and QLD sets us at the heart of our local communities, both as an employer and aged care provider. We actively promote and maintain a proud sense of community – wherever we are, everyone matters.

### Whiddon locations



**Whiddon**

Figure 1 – Whiddon Locations

## Criteria 1 & 2 – Structure, Operations and Supply Chain

### Structure

Whiddon (ABN: 49 082 395 091) is a public company limited by guarantee and registered with the Australian Charities and Not-For-Profit Commission (ACNC). Modern Slavery reporting and non-compliances will be incorporated into Whiddon’s risk enterprise framework and risk management systems. Whiddon operates within Australian borders only, predominantly based in NSW and also operating in QLD.

The roles and responsibilities of the Whiddon Board are set out in the Board Charter. Our Board oversees and is accountable for our Modern Slavery Risk Management Program and signs off on our annual Statement. There are certain responsibilities that the board has delegated to the Executive Team.

Modern slavery risk management initiatives implemented across our supply chain will be incorporated into periodic reports prepared by our Chief Financial Officer. Our Executive General Manager People & Culture is responsible for reporting on modern slavery risk management initiatives as they relate to our people and ensuring our Employee Code of Conduct is revised and updated to reflect labour rights, modern slavery and broader human rights requirements.

Whiddon operates in a sector that is highly regulated within Australia. We have oversight of our workforce (including contractors and outsourced services) and are committed to complying with workplace laws and treating our staff with dignity and respect. As such, we consider the risk of modern slavery to be low within our direct business operations. We acknowledge that the risk of modern slavery is higher in our supply chain where visibility of our suppliers and tiers of our supply chain is limited.

### Board Committee Structure



### Organisation Structure



Figure 2. Whiddon Governance Structure

## Operations

Whiddon (Incorporating Frank Whiddon Masonic Homes of NSW and related entities) is an award-winning aged care provider with residential care, community care and retirement villages across NSW and QLD.

Our strong presence in regional, rural and remote NSW and QLD sets us at the heart of local communities, both as an employer and aged care provider. We actively promote and maintain a proud sense of community – wherever we are, everyone matters.



Figure 3 – Whiddon facts

## Supply Chain

We have been able to identify the geographic location of approximately 40% of all suppliers of goods and services. Whilst many of our direct suppliers are based in Australia, the source country of some of the products we procure (such as medical supplies, food ingredients and ICT equipment) remains unknown.

## Criteria 3 – Modern Slavery Risks

### Operations

Whiddon operates in a sector that is highly regulated within Australia. We have oversight of our workforce (including contractors and outsourced services) and are committed to complying with workplace laws and treating our staff with dignity and respect. As such, we consider the risk of modern slavery to be low within our direct business operations. We acknowledge that the risk of modern slavery is higher in our supply chain where visibility of our suppliers and tiers of our supply chain is limited.

With this in mind, Whiddon is committed to ensuring it addresses and mitigates any risk to modern slavery within any channel of our business.

### Supply Chain

Whiddon engages more than 2,000 suppliers and contractors across NSW and QLD with total annual spend in excess of \$48 million. Our top 10 spend categories include facilities management, building and construction works, utilities, food, ICT and medical consumables (Incontinence, woundcare, etc).

Our exposure to modern slavery risk is low with only five percent (5%) of goods and services sourced from known suppliers in countries where modern slavery risks are generally higher.

We recognize that our spend in categories where the risk for breaches of modern slavery rights continues to be high, where we have taken steps and implemented processes to manage these risks.

Some of these categories include;

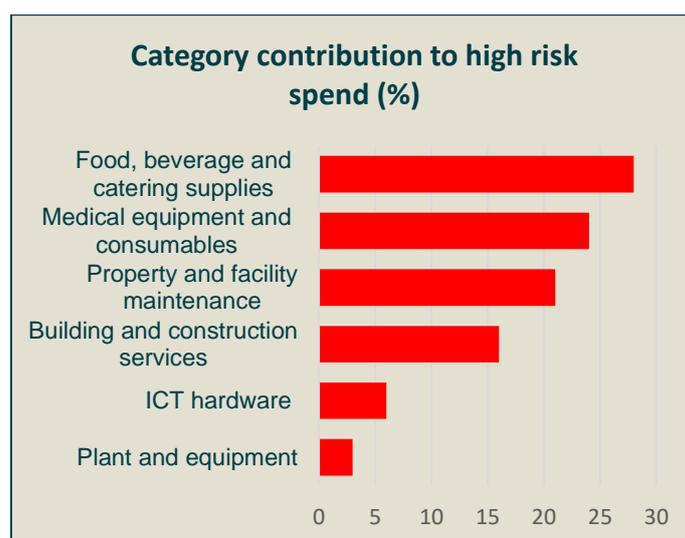


Figure 4. % spend by category

## Criteria 4 – Mitigating Actions

In 2022 Whiddon continued to build on the already solid framework for the management of the identified risks with compliance of the Modern Slavery Act.

Along with maintaining the tools, plans and initiatives outlined in our 2020 and 2021 statements, we further developed our strategy to include the following initiatives;

### *Additional eLearning modules*

We've now completed the integration of Modern Slavery into our new and existing staff training requirements. This module provides an overview of the Modern Slavery Act and the requirements for compliance and reporting across the business.

### *Mandatory training*

We are in the process of identifying key staff across the business where the risk of exposure to potential modern slavery breaches is high and deemed the training a mandatory module as part of their annual eLearning.

### *Integration of Modern Slavery into the Whiddon Enterprise Risk Framework*

To integrate modern slavery into Whiddon's governance structure, we are updating our Enterprise Risk Framework to incorporate the requirements of the legislation.

### *Service and Supply Agreements*

To ensure compliance of our suppliers and contractors to the Modern Slavery Act, we've updated our standard contract terms and conditions to incorporate the framework outlined in the legislation. We have also checked our top 10 suppliers by spend for inclusion on the modern slavery statement register.

## Criteria 5 – Assessment

To track progress managing Whiddon's modern slavery risk, we are implementing a review process to ensure we are meeting commitments within our Modern Slavery Action Plan and three-year Road Map.

### *Annual Review – Board*

Our annual Modern Slavery Statement is approved and signed off by the Board as per mandatory reporting requirements.

### *Quarterly Review – Audit and Finance Committee and Modern Slavery Committee and Leadership Team*

Action Plan progress, issues and achievements are reviewed by the Board Audit & Finance Committee quarterly as part of the compliance update.

Modern slavery progress is reviewed quarterly by our Modern Slavery Committee members and issues and opportunities reported to our Leadership Team on a quarterly basis. Major incidents or issues will be addressed collaboratively across relevant areas of the business.

## Criteria 6 – Controlled Entities

This Modern Slavery Statement incorporates The Frank Whiddon Masonic Homes of NSW and controlled entities;

- Frank Whiddon Nominees Pty Ltd – ABN: 50 001 332 332
- The Frank Whiddon Masonic Homes Foundation Ltd – ABN: 80 001 753 742

## Criteria 7 – Board Approval

This Modern Slavery Statement was approved by the principal governing body of **The Frank Whiddon Masonic Homes of New South Wales** and controlled entities as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 13 December 2022.

Signed – Chair of the Board of Directors

A handwritten signature in black ink, appearing to read "L. Kearns".

Lenoard Kearns  
Director