

# Modern Slavery Statement

## Criteria 1 - About us

Goodwin is a not-for-profit organisation engaging over 800 employees across the ACT and NSW, with a vision that every person should have quality of life and the opportunity to stay productive in their community. Goodwin's main operations include its aged care Residential Care facilities, Home Care aged and health care services and accommodation for retirement living.

## Criteria 2 — Our structure, operations and supply chains

Goodwin Aged Care Services Limited (Goodwin) is a charitable organisation structured as a public company limited by guarantee registered with the Australian Charities and Not-for-Profit Commission (ACNC). Goodwin does not own or control any other entity, operating solely in Australia.

Goodwin is governed by a skills-based Board of Directors and an experienced Executive team who oversee and deliver on the organisations vision.

Goodwin's supply chain includes suppliers and contractors covering clinical and allied health services, hospitality services (i.e. food services, catering, cleaning, laundry), pharmacy & medical supplies, property services (i.e. maintenance, utilities, waste management, security, gardening etc), and various administration support (i.e. marketing, information technology; equipment, capital & property development works), and engages advisors for its investment portfolios.

## Criteria 3 — Identification of modern slavery risks in our operations and supply chain

Goodwin engages employees who align with our values and ensure compliance with local and national laws related to human rights and modern slavery in our workplace.

Goodwin has a strong focus on managing the health, safety and wellbeing of our employees and volunteers creating and maintaining both a diverse workforce and an inclusive and safe workplace for all.

As an aged care service provider in a highly regulated industry, Goodwin considers the risk of modern slavery within its direct business operations to be relatively low. However, reviews of supply chains are maintained to consider the risk that we may be indirectly linked to modern slavery practices. Areas of higher vulnerability exist within outsourced services for the organisation such as hospitality services, facilities management, building construction and across agency organisations.

## Criteria 4 — Actions to assess and address risk

Goodwin includes risk mitigating strategies in company policies and procedures to remove potential infringements in our business operations and supply chains through:

- Governance - Goodwin raises the awareness, accountabilities, and mitigating strategies of modern slavery risks through its risk governance structure including management and its governing body.
- Supplier Obligations – Goodwin has policies in place which outlines Goodwin's commitment to ethical, socially responsible, and sustainable practices.



As part of the policy, Goodwin has a questionnaire specific to Modern Slavery highlighting that Goodwin does not tolerate non-compliance with modern slavery laws.

- Supplier Compliance – Goodwin has an electronic system that manages contractor compliance administration. Whilst Goodwin acknowledges that we do not engage directly with suppliers that do not support Modern slavery requirements, it is possible that risk may exist within the supply chains of engaged suppliers.
- Supplier Selection – Goodwin’s procurement and contract management documents require suppliers and contractors to provide information on their approach to managing modern slavery in their supply chain.
- Grievance and Feedback Mechanisms – Goodwin has a Whistleblower Policy and complaints mechanism process that allows all Goodwin stakeholders to raise concerns such as modern slavery risks in a confidential manner.

Goodwin intends to strengthen our understanding of human rights issues as they apply to our business operations and in particular our supply chains. Noting that mitigating risks of Modern Slavery failures within our supply chain is encouraged through the engagement of reputable suppliers, our key areas of focus over the next reporting period will be to:

- Embed our new supplier and contractor management system, which continues the capture and compliance of our obligations
- Review our risk framework to incorporate any improvements for understanding modern slavery and human rights risks through the organisation’s governance structure.

## Criteria 5 — Effectiveness Assessment

In order to assure our approach to Modern Slavery risk stays relevant and effective, Goodwin will:

- Continue to communicate with new and existing suppliers as to their obligations

- Require suppliers to complete a questionnaire & review the responses that will highlight Modern Slavery risk within organisations when supplying proposals
- Continue to educate employees on possible risks and risk management strategies relating to Modern Slavery
- Maintain Modern Slavery risk as part of the decision process when onboarding potential suppliers
- Consider the requirements of Modern Slavery legislation when assessing internal business systems and workflows.
- Review feedback for possible instances of Modern Slavery, and where appropriate, escalate to the governing body, and
- Understand the impacts of other legislation as it relates to our approach to Modern Slavery risk.

Consistent with the Modern Slavery Act, the Board of Directors will review the organisation’s actions to address modern slavery risk and approve the annual Modern Slavery Statement.

## Criteria 6 — Consultation with entities owned or controlled

Goodwin is a charitable organisation structured as a public company limited by guarantee and does not own or control any other entity. As such, this criterion is not applicable.

## Criteria 7 — Other relevant information

Goodwin rejects any form of modern slavery and human trafficking, and we are committed to implementing effective systems and controls to ensure it does not take place directly within our own business or our supply chains.

We respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

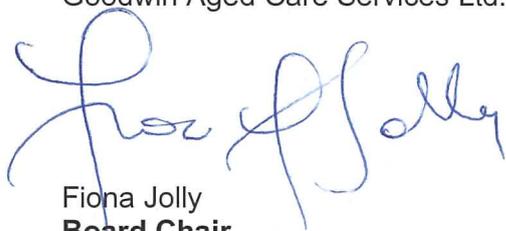


We expect our service providers, suppliers and contractors to share this commitment to ensure that modern slavery is not taking place in their organisations or within their own supply chains.

## Authorisation

This statement was approved by the Board of Directors in their capacity as principal governing body of Goodwin Aged Care Services Ltd (ACN 120 298 986) and constitutes our modern slavery and human trafficking statement for the financial year ended 30 June 2025.

This statement is signed by Fiona Jolly in her role as the Chair of the Board of Directors of Goodwin Aged Care Services Ltd.



Fiona Jolly  
**Board Chair**  
8 December 2025

