

Modern Slavery Statement

Whiddon

Disclosure

This statement has been developed in accordance with the Commonwealth Modern Slavery Act of 2018 and set out the steps taken by Whiddon to meet the mandatory criteria required by legislation.

This statement has been endorsed by Whiddon's Board of Directors.

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

Len Kearns
Whiddon Chairman

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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 70 years. From our philanthropic beginnings, we have grown into a large not-for-profit organisation with more than 2,300 customers and over 2,000 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.

Our Purpose

Our purpose is to enrich people's lives and make a real difference. Whiddon's aim is to improve quality of life for those we care for, and their families, and to keep them connected to the people, places and communities that matter to them. We also acknowledge the importance of supporting the wellbeing of Whiddon people, who are so important to everything that we do.

Introduction to Modern Slavery

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

Aim

The aim of this document is to clearly define Whiddon's commitment to comply with Modern Slavery Legislation and to ensure that Whiddon and its business partners and communities, collaborate and play a role in combatting Modern Slavery. This statement strives to ensure that Whiddon recognises the imperative for eradication of modern slavery and is committed to establishing the requisite processes and frameworks to monitor, identify and eliminate risks associated with modern slavery.

Our Business

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. Whiddon is passionate about enriching lives and keeping older Australians connected to what matters most to them.

Whiddon invests back into its people, communities and services. It also partners with academics and universities that are developing innovative programs and training around quality of life and ageing.

Whiddon’s strong presence in regional, rural and remote NSW and QLD sets it 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 1 - Our Business

Company Structure and Governance Framework

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. There are certain responsibilities that the board have delegated to the Executive Team.

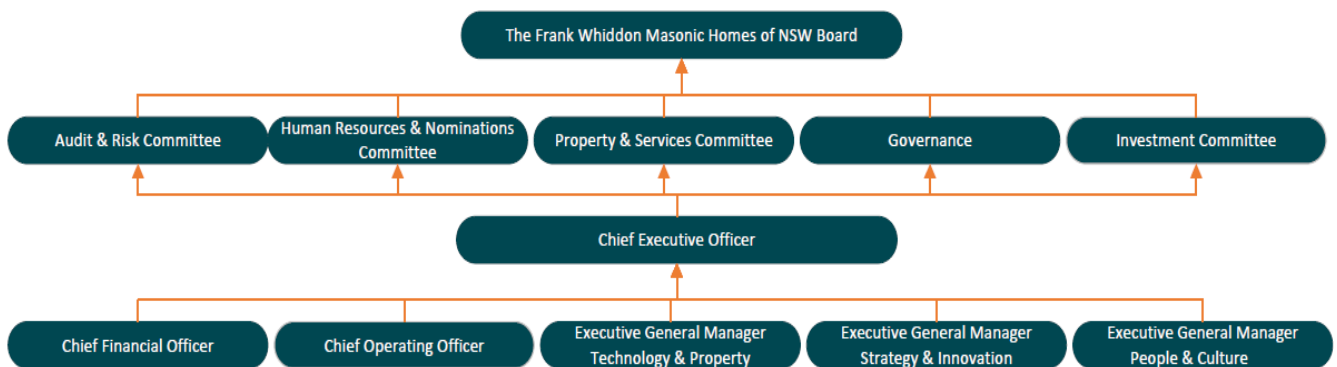


Figure 2 - Governance Structure

Whiddon Operations

Whiddon locations

Service	Locations	Beds/Units
Residential		
Residential	20	1948
Retirement Living		
Retirement Living	13	303
Community Care		
Community Care Service Hubs	10	

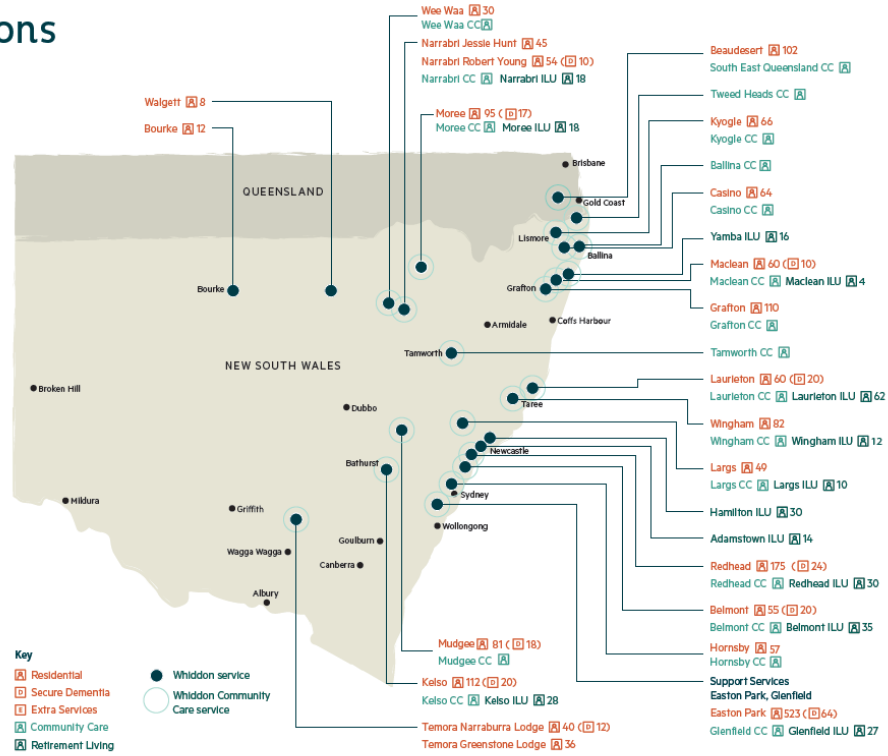


Figure 3 - Whiddon Locations

Modern Slavery Mitigation Initiatives

Whiddon Roadmap 2019/20

Key Initiative	Deliverables
Establish Aged Care Sector Modern Slavery Guidelines	Completed guidelines in relation to aged care and established aged care modern slavery committee
Draft Modern Slavery Statement for Whiddon	Completed draft statement in consultation with industry peers

Whiddon Roadmap 2020/21

<u>Key Initiative</u>	<u>Deliverables</u>
Establish a working committee	Whiddon's MS Committee will be established and consist of representatives from Risk and Compliance, Finance, Procurement, Hospitality, Learning and Development) and the Property Department.
Gap Analysis	Undertake internal gap analysis identifying areas of improvement and address areas specified in this document regarding Modern Slavery. To date we have identified 9 possible key areas of risk in our supply chain with the view to deep dive into the suppliers providing services in these areas.
Policy and Procedure Reviews	Review the Procurement Policy and Procedures, Service and Supplier agreement templates, and all relevant documentation to be updated accordingly.
Supplier Engagement	Engagement with the top 50 key suppliers to audit and review their response to Modern Slavery (where applicable).
Education & Training	Whiddon to provide information sessions and awareness campaigns to our leaders and organization throughout the year.

Whiddon Roadmap 2021/22

<u>Key Initiative</u>	<u>Deliverables</u>
Effectiveness Assessment	Establish action plan and due diligence processes to assist with reviewing supplier KPI's and internal procedures regularly in order to improve on the effectiveness of our assessments through the MS working group (to meet quarterly).
Supplier engagement / enhance our due diligence process	Support ongoing development of supplier engagement initiatives in our tendering processes to address, assess and audit Modern Slavery statements of our key Tier 1 supply chain.
Organisational training and education	Educate all Whiddon teams to better understand Modern Slavery and how to identify and report incidents.
Continuous Improvements	Ongoing review and audit of risk strategies, training, supplier engagement and internal processes.

Whiddon Roadmap 2022/23 and ongoing

<u>Key Initiative</u>	<u>Deliverables</u>
Ongoing Supplier Engagement	Establish robust key criteria platforms to risk assess and audit our suppliers when entering into new contracts. This will be reviewed annually to ensure Whiddon remains compliant.
Continuous Supplier assessment	Whiddon will review beyond the Tier 1 suppliers to the wider supply chain network to assess further geographical and industry modern slavery risks.
Education and training	Work with our Learning and Development team, to onboard the training module for Modern Slavery by incorporating it into our E-Learning platform.

Whiddon's Supply Chain

Whiddon seeks to procure from suppliers (trade and non-trade e.g. ICT, Construction, Service Providers, etc.) who demonstrate a commitment to implementing policies and practices that are:-

- compliant with all relevant legislation and;
- adhere to sustainable procurement practices that support environmental, social and economic values and principles.

Whiddon are in the process of reviewing and amending its procurement policies and procedures to incorporate ethical sourcing and addressing modern slavery initiatives across its supply chain.

Whiddon engages more than 2,000 suppliers and contractors across NSW and QLD with total an annual spend in excess of \$40 million. Our top 10 spend categories include facilities management, building and construction works, utilities, food, ICT and medical consumables (Incontinence, woundcare, etc).



Figure 4 - Supply Chain Information

Supplier Governance Framework

To help make informed purchasing decisions, Whiddon manages contract tenures closely to ensure that contract terms are no longer than 5 years. After each contract expiry we either renegotiate a new agreement based on our basic 5 principles in Figure 5 or re-tender.

Where procurement policies dictate, Whiddon sources goods and services via a tender process where the requirement of goods and services are generic and where consolidation of supply can meet better economical outcomes. The tender process is supported by a tender committee and the suppliers / contractors must meet a predetermined set of criteria. Whiddon has now added to its tender criteria, the requirement for either submission of a Modern Slavery Statement or a "Declaration on Human Rights" if a Modern Slavery statement is not required under the Modern Slavery Act 2018.

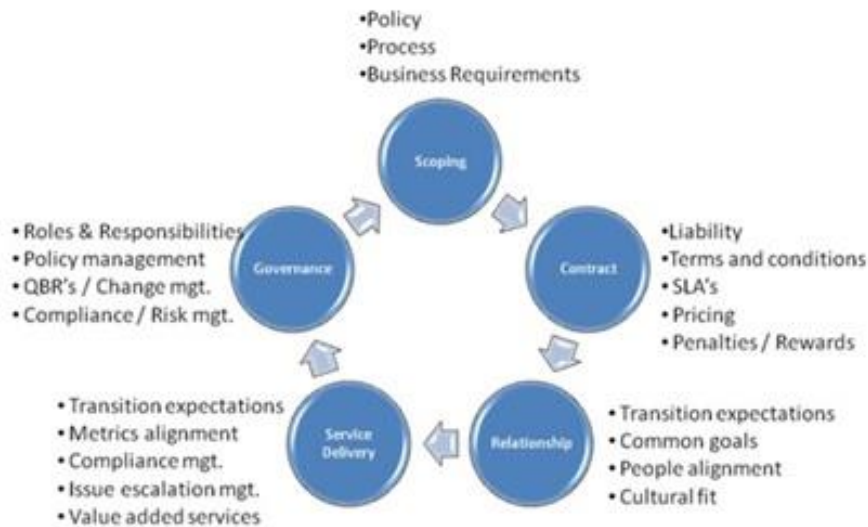


Figure 5 - Contract & Tender Approach

Where suppliers are unable to satisfy the requirements or are unwilling to share this information, their tender submission will be assessed as not meeting the terms and conditions of tender.

Supplier Code of Conduct

Our supplier code of conduct is stipulated in each of our Supply Goods Agreements and Service Level Agreements and sets out the supplier expectations in relation to work health & Safety, Business Integrity, Privacy, Environmental Sustainability, Social Responsibility and diversity. The Agreements are under review to include terms and conditions relating to Ethical Sourcing and Modern Slavery requirements.

Procurement Strategies

Whiddon ensures that when purchasing any new products, a process of sampling may be undertaken. For major tenders, trials can be undertaken on products followed by an extensive tender process.

The procurement policies and guidelines determine how good and services should be procured, where majority of purchases are between \$20,000 and \$150,000 annually, a 3 quote process is required; and purchases above \$150,000 annually will revert to a tender process.

Continuous Improvement

To address the requirements of the Modern Slavery Act, Whiddon has established a cross-functional working committee with representation from Finance, Procurement, Hospitality, Risk & Compliance, Property and People & Culture.

The committee is responsible for due diligence activities across our operations and supply chains, reviewing Whiddon’s Modern Slavery initiatives and ensuring compliance with the relevant legislation.

Whiddon's People

Part of Whiddon's commitment is to treat people with respect and dignity as individuals, non-tolerance of any form of discrimination or harassment, and we strive to be an equal opportunity employer.

We are committed to ensuring that our conditions of employment and how we engage and manage our workforce complies with all industrial relations, work place and employment legislation. We are further committed to our people, contractors and visitor's health, safety and wellbeing and ensure a safe workplace environment.

Whiddon's Enterprise Risk Framework assists with the measuring and managing of human rights violations in our workplace and includes: -

- People & Culture Policy and Procedures
- Ethics and Code of Conduct
- Employee training and awareness

Code of Conduct

The code of conduct will be updated to ensure that Whiddon uphold requirements in accordance with the Commonwealth Modern Slavery Act of 2018. Whiddon aims to create an environment that is of a professional standard, and upholds 'Whiddon Values' along with our unique approach to caring for our clients. Whiddon aims to foster a culture that encourages employees to work in a manner that is professional and ethical in all aspects of their daily work routine and decision-making process.

This code applies to:

- Persons who are employed by Whiddon, whether on a permanent, casual or temporary basis,
- Contractors (Including visiting practitioners, agency staff and volunteers) working for Whiddon;
- Students undertaking work experience, or persons undertaking or delivering training or education for Whiddon.

At Whiddon, we have a large and diverse workforce, with some of our employees covered by professional boards that set out the minimum standards of how a professional should conduct themselves within and outside the professional domains. The Code of Conduct is in place to ensure the 'good standing' of the individual's profession, but most importantly it helps to ensure clients are receiving the best possible care and attention.

Therefore, the Code of Conduct from the Nursing and Midwifery board of Australia, Physiotherapy board of Australia, Occupational Therapy board of Australia and any of the other remaining professional and health practitioners' regulatory agencies must be read in conjunction to this policy and any breach thereof, may constitute a breach of this Policy.

Whistleblowers

The Whistle Blower policy will be updated where Whiddon stakeholder are able to report any breach in compliance with our Modern Slavery statement. Whiddon encourages its employees, suppliers or clients who might witness or whom are aware of any violations of the law, Whiddon policies and codes of conduct or any other ethical standards, to confidentially report such violations under Whiddon's Whistleblower policy via whistleblower@whiddon.com.au

Training

Whiddon is committed to promoting a culture where learning and development are an integral part of the organisation. As part of our ongoing commitment to training and development Whiddon will ensure modern slavery training is provided to the organization and will focus on awareness campaigns.

Whiddon believes that learning is a continual and lifelong process that provides benefits to the individual, the organisation, and clients. Whiddon is committed to addressing issues related to employee development as an integral component of workforce planning.