

Modern Slavery Statement

The Frank Whiddon Masonic
Homes of NSW
(trading as Whiddon)

ABN: 49 082 385 091

Whiddon

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Statement on Modern Slavery

As a purpose-led organisation, Whiddon is committed to enriching people's lives and making a real difference.

For us to achieve our purpose, we recognise the need to be a responsible business. We continue to evolve our approach to our Environmental, Social and Governance responsibilities and are actively working to identify and mitigate modern slavery risk within our Organisation.



Whiddon operates in a sector that is highly regulated within Australia. We oversee our workforce including contractors and outsourced services and are committed to complying with workplace laws. Our employees are treated with the highest levels of dignity and respect. We consider the risk of Modern Slavery to be present within our direct business operations and acknowledge the risk of Modern Slavery is higher within our supply chain, where visibility of our suppliers and tiers of our supply chain is limited.

Whiddon's modern slavery risk management is overseen and endorsed by Executive Leadership and approved by the Board of Directors. Combatting modern slavery is not only a moral imperative but also a strategic necessity for businesses committed to ethical practices, legal compliance, and long-term sustainability.

During the 2024 reporting period, our key areas of focus in our modern slavery strategy were:

1. Development of a Modern Slavery policy and improved supplier assessment frameworks
2. The development of two new mandatory training modules to be delivered via our Learning Management System on an annual basis.
3. Consolidation and increased controls/visibility of our contingent agency workforce via a commercial contract review process and agency booking portal implementation.

Further detail on each of these activities are provided within this Modern Slavery Statement which has been prepared in accordance with the *Modern Slavery Act 2018* (Cth).

A handwritten signature in black ink, appearing to read 'Chris Mamarelis'. The signature is fluid and cursive, written over a white background.

Chris Mamarelis
Chief Executive Officer - Whiddon

Purpose of this Modern Slavery Statement

The 2023 Global Slavery Index estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia.

Through this statement, Whiddon aims to articulate its support and commitment of the Modern Slavery Act 2018 to combat modern slavery and the protection of workers through increased transparency, risk identification and management, social responsibility, and continuous improvement.

What is Modern Slavery

Modern Slavery is an umbrella term that includes practices like slavery, servitude, human trafficking and forced labour. There are many different categories that sit within these types, and they often overlap, so a victim of one type of slavery can often be a victim of two or three. The term 'Modern Slavery' is used to describe serious exploitation that involves the loss of freedom.

Australia's *Modern Slavery Act 2018* defines modern slavery as including eight serious forms of criminal exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

Policy Statement

Modern Slavery is the exploitation of a person's dignity and human rights, and all forms of slavery, which includes human trafficking, servitude, forced labour, debt bondage and wage theft, are a serious crime under Australian law.

Whiddon does not tolerate any form of slavery or human rights violation. We are committed to ensure continuous improvements and enforcing effective measures within our business and our supply chain to combat modern slavery.

Criteria 1 & 2 – Structure, Operations and Supply Chain

About Whiddon

Whiddon is an award-winning aged care and national disability provider that has been providing exceptional care to older Australians for more than 75 years. From our philanthropic beginnings, we have grown into a large not-for-profit organisation with more than 2600 Residents and clients across Residential aged care, Community and Disability Care as well as Retirement living villages.

Our services are delivered across metro, regional, rural, and remote areas of New South Wales and Queensland.

Whiddon have over 2600 employees who pride themselves on delivering exceptional care standards. Whiddon employees are key to Whiddon's success.

Our purpose is to enrich people’s lives and make a real difference. We actively promote and pride ourselves on our sense of community and value the community connections we have within the regions in which we operate. Wherever we may be, everyone matters.

Whiddon locations

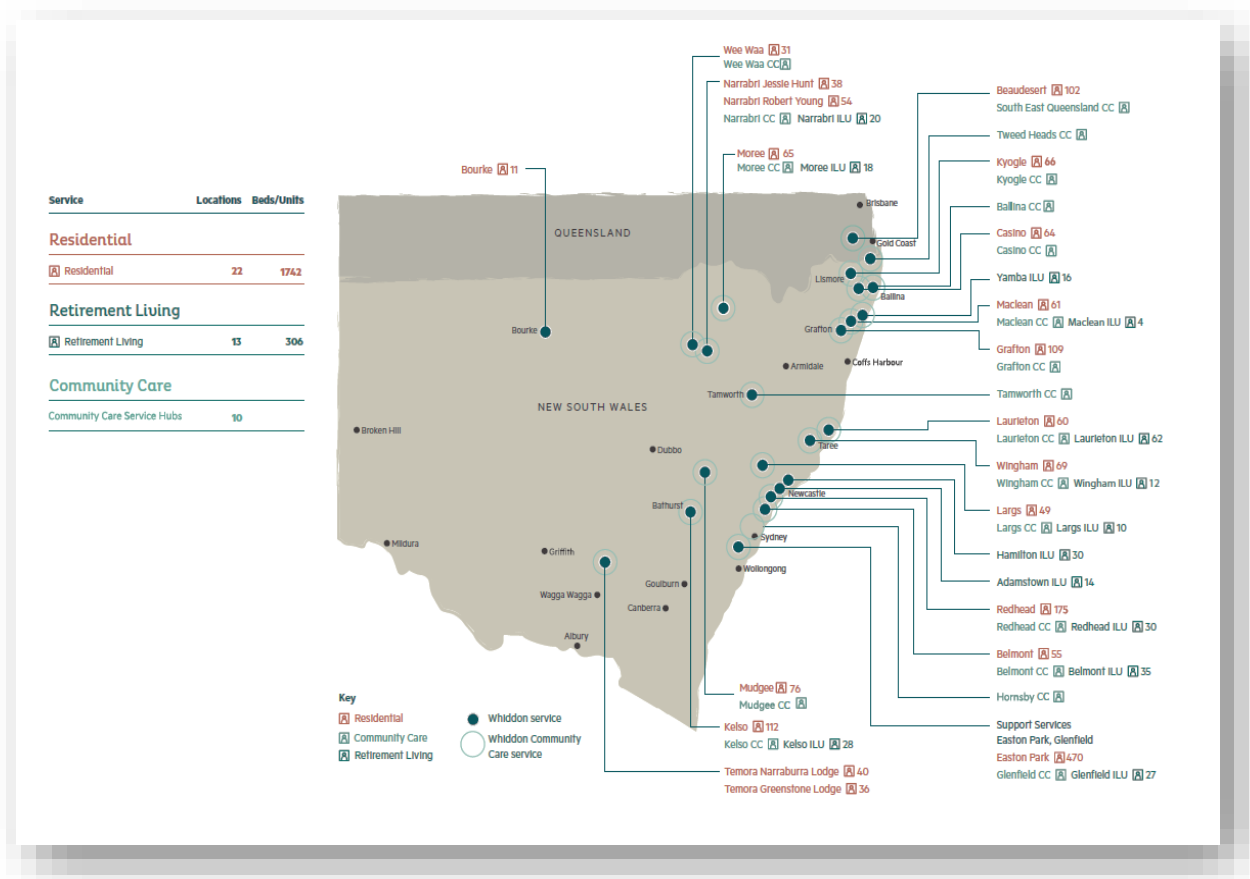


Figure 1 Whiddon Locations

Company Structure and Governance Framework

The Frank Whiddon Masonic Homes of NSW (FWMH) trading as Whiddon (ABN: 49 082 385 091) is a company limited by guarantee and registered with the Australian Charities and Not-For-Profit Commission (ACNC).

The Frank Whiddon Masonic Homes of NSW and controlled entities are:

- The Frank Whiddon Masonic Homes Foundation Ltd (ABN: 80 001 753 742)
- The Frank Whiddon Homes of NSW trading as Whiddon (ABN: 49 082 385 091)
- Frank Whiddon Nominees Pty Ltd (ABN: 50 001 332 332)

Whiddon operates within Australian borders only – in both NSW and QLD.

Whiddon is an Approved Provider of aged care services registered with the Aged Care Quality and Safety Commission under the *Aged Care Act 1997*.

Whiddon is registered with the National Disability Insurance Scheme (NDIS) Commission as a certified service provider.

Whiddon supplies Retirement Living services, regulated by the *Retirement Villages Act 1999* (NSW).

Whiddon is governed by a volunteer Board of non-Executive Directors, supported by the CEO and Executive Leadership team. The roles and responsibilities of the Board are set out in the Board Charter. The Board are responsible for providing strategic oversight and governance for the Organisation, ensuring that Whiddon's care and operations are aligned to its purpose, strategic direction, and constitution, as well as ensuring that risk is identified and mitigated effectively.

The Board are responsible for ensuring that risk is identified and mitigated effectively.

Board sub-committee's play a crucial role in organisational governance, by focussing on specific areas such as clinical compliance, audit, risk management, Infrastructure and People & Culture. These sub-committees allow for more detailed oversight and expertise in their respective domains, enhancing efficiency and effectiveness of Board decision making. Sub-committees report their findings and recommendations to the full Board for consideration and approval.

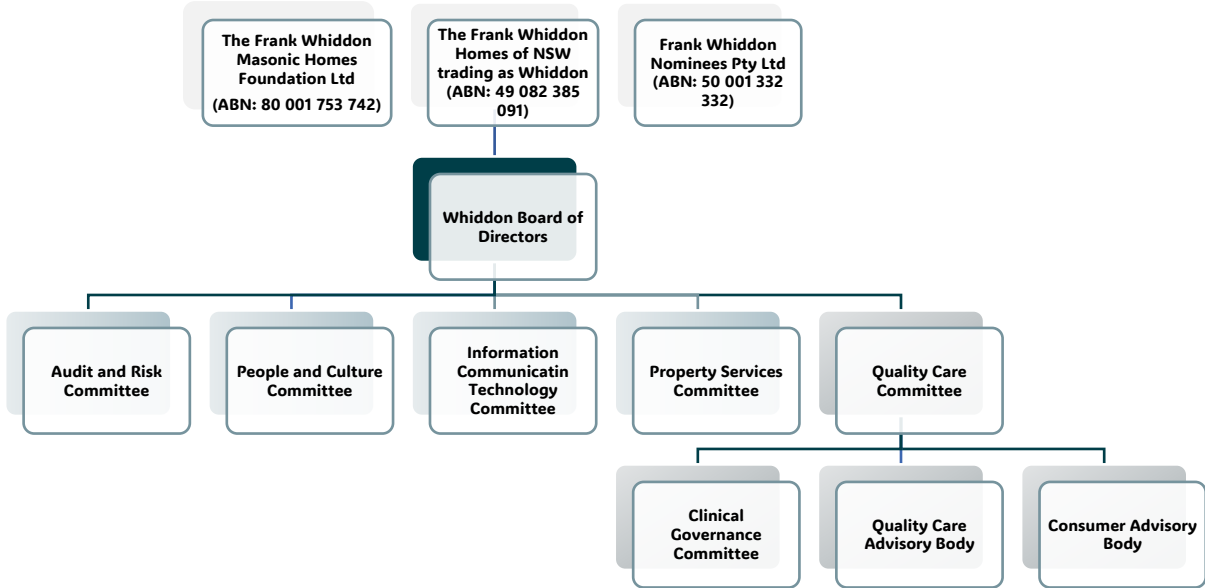
The Whiddon Board has delegated authority to the CEO and the Executive Team to oversee, monitor and manage the organisation's day-to-day operations including the risk management of modern slavery.

Organisation Structure and Governance

The Organisation is structured into several key divisions, each led by a senior executive who reports to the CEO. This structure facilitates efficient decision-making and operational effectiveness. Our governance framework includes a robust set of policies and practices overseen by the Board of Directors, ensuring that all actions align with our purpose and long-term strategic goals. The Organisation has a mature audit and risk assessment framework to ensure high standards of accountability and integrity are maintained.

Organisational Governance Structures

BOARD GOVERNANCE STRUCTURE



EXECUTIVE LEADERSHIP STRUCTURE



Operations

Whiddon (Incorporating Frank Whiddon Masonic Homes of NSW and related entities) is an aged care provider with residential care, community care, disability care and retirement villages across New South Wales and Queensland (encompassing metro, regal, rural and remote locations). A snapshot of our Organisation profile as follows:

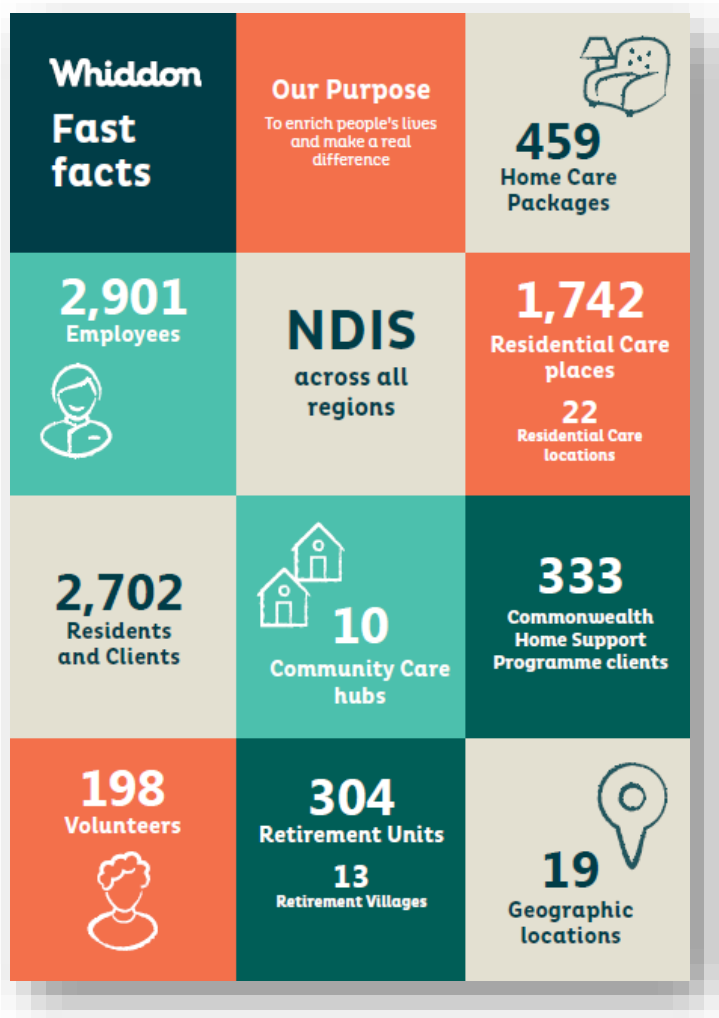


Figure 2 Whiddon Quick Facts

In 2024, there are no new areas of elevated modern slavery risk identified through our supply chain assessment or incidents raised through our incident management process or confidential whistleblowing service.

Due to industry wide staff shortages the sector has seen an increased reliance on a contingent workforce i.e. temporary agency employees. At Whiddon, this is namely temporary nursing agencies who are engaged through third party preferred suppliers, with whom Whiddon have commercial agreements in place. This workforce is used to supplement Whiddon's own people to ensure we are meeting our mandated care minute obligations and providing the best possible care and support to consumers. This contingent workforce may present a risk of modern slavery where Whiddon does not have a complete line of sight over agency operations. Mitigating actions to monitor and assess this risk are included below.

Supply Chain

Whiddon sources goods and services from suppliers necessary for the provision of aged care services across each of our business streams.

Suppliers can range from medical equipment providers, pharmaceutical companies, food suppliers, to providers of personal care items, and employees to provide care from third party agency suppliers.

Whiddon engages in procurement activities to acquire necessary goods and services which involves sourcing, purchasing, and negotiating contracts with suppliers to ensure a reliable supply of quality products , services, and personnel at competitive prices.

Whiddon manages human resources to ensure that Whiddon facilities have an adequate supply of essential personnel, to meet consumer's needs. **Whiddon manages orientation and induction of agency personnel from third party agencies.**

Whiddon adheres to regulatory standards and requirements concerning the procurement, storage, and distribution of goods and services. Compliance ensures the safety, quality, and legality of personnel and items used in care service provision.

Whiddon uses orientation and induction systems, quality assurance checks, monitoring of suppliers, and ensuring that products, services, and personnel meet the specific needs and safety requirements of consumers.

There is an increase of focus on sustainability within the supply chains.

Whiddon collaborate closely with healthcare providers such as doctors, nurses, allied health professionals and pharmacists to ensure coordinated care and appropriate management of supplies related to medical treatments and therapies.

Whilst many of our direct suppliers are based in Australia, the location of some products we procure (medical supplies, food ingredients and ICT equipment) remains unknown.

Whiddon reports on its actions to assess and address modern slavery risks in its operations, including risks associated with agency and contracted employees.

Criteria 3 – Modern Slavery Risks

Modern Slavery Risk in Operations

During this reporting period, we analysed our supply chains and operations to identify modern slavery related risks and established a risk register of the key risk areas identified. We have developed mitigation strategies to reduce the identified risks.

During the assessment process, we identified the areas with the lowest risk, such as local operations handled by staff directly employed by us. Whiddon operates in a sector that is highly regulated within Australia. We oversee our workforce (including contractors and outsourced services) and are committed to complying with workplace laws and treating our employees with dignity and respect.

We consider the risk of modern slavery to be present within our direct business operations. We consider that the risk of modern slavery is greater in our supply chain where visibility of our suppliers and tiers of our supply chain is limited.

Whiddon uses external agency direct care workers and contract out some components of service such as linen services. There is a risk that these workers may be recruited through unethical practices such as deceptive recruitment fees, coercion, or debt bondage. Workers may also face exploitative working conditions, including long hours, inadequate pay, and restricted freedom of movement.

Whiddon procure a wide range of goods and services, including medical supplies, food, cleaning services, facility maintenance and construction and agency staffing. There is a risk that suppliers within these sectors may engage in practices that involve modern slavery. Subcontracting and sub-tier suppliers can obscure visibility and accountability, making it difficult to monitor and address modern slavery risks effectively throughout the entire chain.

Global Supply Chains: Many goods used by Whiddon facilities are sourced globally, where labour standards and enforcement mechanisms may be weaker compared to Australia. The global nature increases the risk of modern slavery, especially in regions with less stringent labour laws and oversight.

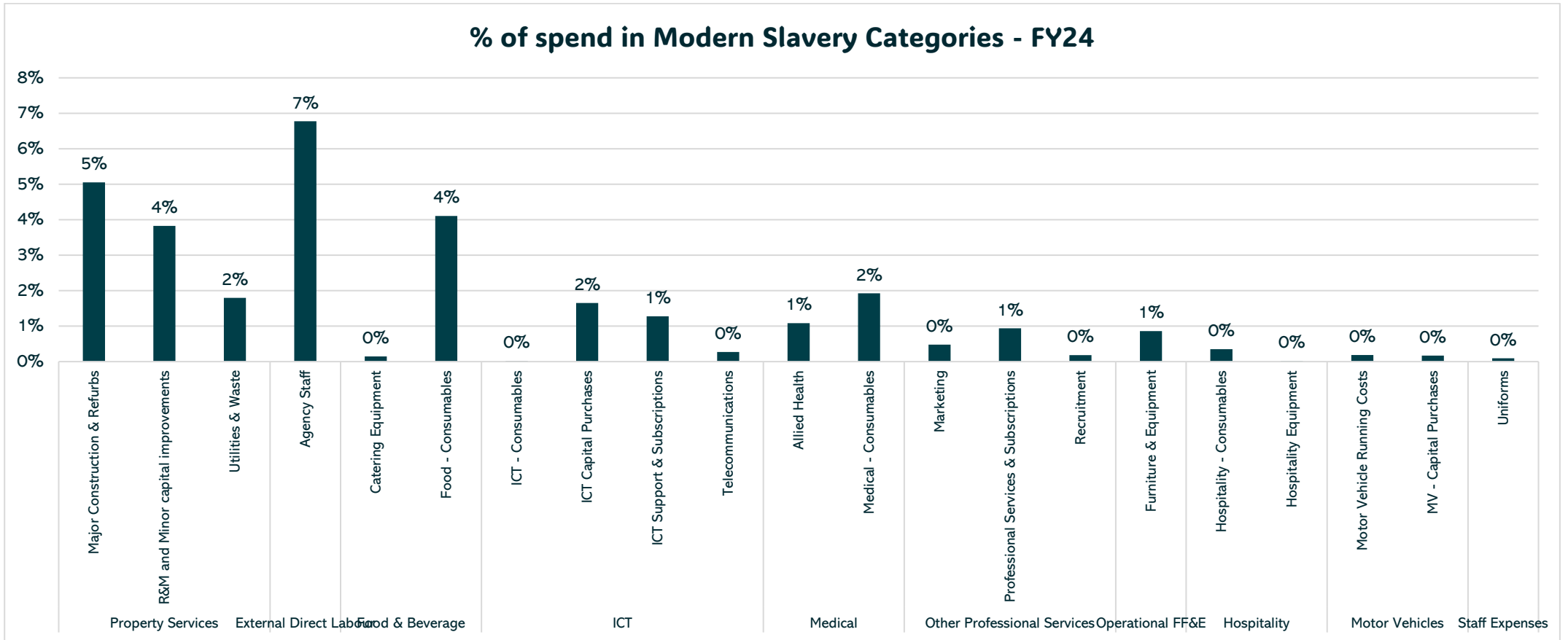
High Risk Supply Chain Categories

Whiddon engages more than 2,000 suppliers and contractors across NSW and QLD with total annual operational and capital spend in excess of \$267 million.

In Financial Year 24, 31% of our total supplier/contractor spend was within categories identified as being at a higher risk of breaches of modern slavery rights (refer to Figure 4).

Whiddon's exposure to this risk is reduced by the fact that 95% of our goods and services are sourced from known suppliers in countries where modern slavery risks are lower.

Expenditure in Modern Slavery risk categories



Criteria 4 – Mitigating Actions

Whiddon has continued to build upon the Modern Slavery framework implemented to manage the identified risks with compliance of the Modern Slavery Act. New items in 2024 have been highlighted below.

Governance and Policies

Over this reporting period, we have made significant progress in implementing policies and actions to assist in addressing the modern slavery risks associated with our operations and supply chains. These include introducing a requirement for statements and policies specifically related to modern slavery in requests for tender and requests for quotations; engaging more with suppliers on modern slavery issues; and reviewing our internal whistle blowing channels to determine whether they sufficiently cover the issue of Modern Slavery

Modern Slavery Committee

Whiddon has in place a Modern Slavery committee, which is comprised of members of Whiddon's leadership team. This committee is focused on formulating the Modern Slavery action plan and implementing agreed actions. The committee meets twice per annum. Meeting minutes and action plans are shared with the Board and Executive Leadership team for review.

The strategies developed are applied across all of The Frank Whiddon Masonic Homes of NSW controlled entities

Modern Slavery Policy

A Modern Slavery Policy has been developed and approved by The Frank Whiddon Masonic Homes of NSW Board. The policy includes minimum Modern Slavery assessment criteria for suppliers to Whiddon and applies across all entities.

Modern Slavery Register

The committee has taken on the role of holding a register of suppliers that are found to not comply with Modern Slavery Governance expectations so that they are not used by Whiddon.

Modern Slavery Monitoring

The Modern Slavery Committee members review our Modern Slavery progress twice per annum. Major incidents or breaches are addressed collaboratively across relevant areas of the business, as well as escalated to senior management and the Board via the organisations risk and reporting protocols.

Suspicion of, or actual modern slavery concerns, will be reported directly to the Chief People Officer for consideration of an action plan that is best suited to ensure that the person/s affected are not compromised or placed at further risk.

The person/s affected will be referred to external organisations that specialise in assisting those affected by Modern Slavery.

Enterprise Risk and ESG Framework

Modern Slavery has been integrated into Whiddon's formal Governance Structure and the Whiddon Enterprise Risk Framework, incorporating the requirements of the legislation. Modern slavery risk is included in the Environmental and Social Governance Framework that is being developed for the sustainable future of Whiddon.

Furthermore, Whiddon is committed to being an Organisation where employees are encouraged to be courageous and raise issues via our embedded procedures. Whiddon also employ an external and independent whistleblowing service.

Modern Slavery Auditing Processes

To ensure Whiddon is looking 'close to home' and not only at supply chains, a business process is being developed where a review of employee names is audited against payee names on bank accounts receiving payment for employment. The process will include actions to take when a name differs from the employee name including actions to put the person in touch with Modern Slavery support services or other services if required, including domestic violence supports.

Training and Engagement

Modern Slavery Training

Two new and improved (2) Modern Slavery mandatory online learning modules have been implemented for completion by all employees involved in purchasing and sourcing goods and services. The modules outline the requirements under the Modern Slavery Act, for compliance and reporting across the business.

Collaboration and External Education

Whiddon welcomed the Federal Government national action plan to combat modern slavery 2020-2025 and the appointment of a Commonwealth Anti-slavery commissioner in addition to the state-based commissioner. Whiddon is committed to actively collaborating with Government and taking advantage of additional guidance and education opportunities.

Third Party Management and Procurement

Service and Supply Agreement Terms

We have engaged a subject matter expert external party to assess our top 20 suppliers by spend and all labour hire companies that we engage with to assess the supplier on their compliance with the Modern Slavery Act. This information will be used to determine

ongoing relationships and engagement with the supplier.

Our standard contract terms and conditions has been updated to incorporate the framework outlined in the legislation. This change has ensured compliance of our suppliers and contractors to the Modern Slavery Act. Variances to the required expectations are flagged with the Executive and acted upon. Our high risk and top 10 suppliers are checked annually for inclusion on the Modern Slavery Statement register.

Ethical Investments

Whiddon's Ethical Investments policy outlines Whiddon's commitment to responsible and sustainable investment practices. Where possible, Whiddon believe in aligning our financial activities with our core values, promoting ethical conduct, and contributing to positive social and environmental impact. This is managed by Executive key personnel and reviewed annually by the Board of Directors.

People

Contingent Workforce / Temporary Agency Staff

In 2024, Whiddon undertook a commercial and quality review of all third-party employment agencies. As a result, there was a large-scale consolidation of the agencies used to provide temporary employees (namely nursing staff in our residential care facilities), resulting in a 70% reduction in the number of agencies being used. These preferred suppliers were then required to sign a Whiddon service agreement, which contains specific modern slavery provisions including Whiddon's position against modern slavery, agency requirement to have modern slavery controls in place, and the need for them to comply with applicable laws relating to wages and entitlements. In addition to this, Whiddon gained full visibility over the worker details, by implementing mandatory use of a centralised agency booking portal.

Migrant Workers

For all employees, including migrant and non-migrant workers, Whiddon conducts right-to-work checks through the employee onboarding process and throughout the employee's tenure with Whiddon, to ensure their employment complies with relevant laws and to establish, as far as possible that they meet our ethical standards. Whiddon ensures that all employees are engaged under the same terms and conditions, in accordance with their position and qualifications. All employees are required to hold a nationally certified Criminal Record Check or NDIS worker check in order to work with vulnerable adults. This ensures the identity of workers is known and that they have access to their own identity papers which are viewed by the regulatory or certification issuing body. Original documentation is cited, and copies are retained on employee files.

Minimum Wage Rates

Whiddon has a dedicated Board People and Culture Sub-committee who oversee all decisions regarding employee remuneration.

As part of Whiddon's commitment to acting ethically and with integrity, robust business processes including audits and controls are in place to ensure that all of our people are paid more than or equal to the minimum wage rates, as determined by the applicable Enterprise Agreement and Modern Award and through a corporate remuneration framework that is governed by a dedicated Board People and Culture Sub-committee who oversee all decisions regarding employee remuneration. Whiddon's enterprise agreement also allows for an administrative wage rate increase in October of each year.

Criteria 5 – Assessment

Whiddon is monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the United Nations Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

Annual Review – Board

Our annual Modern Slavery Statement is approved and signed by Whiddon's Board prior to publication in December of each year, as per mandatory reporting requirements.

Bi-Annual Review –Modern Slavery Committee and Leadership Team

Our Modern Slavery Committee members review our Modern Slavery progress twice per annum. Major incidents or breaches are escalated to the Chief People Officer and addressed collaboratively across relevant areas of the business, as well as escalated to senior management and the Board via the organisations risk and reporting protocols.

Ongoing framework development

Modern Slavery assessment criteria has been developed to apply to proposed contractors and suppliers and forms part of the Modern Slavery Policy.

Modern Slavery is being incorporated into the broad Environmental and Social Governance framework project plan to be embedded and assessed on an ongoing basis.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

Criteria 6 – Controlled Entities

This Modern Slavery Statement incorporates The Frank Whiddon Masonic Homes of NSW and controlled entities. Strategies to address MS are embedded across all entities.

- The Frank Whiddon Masonic Homes Foundation Ltd (ABN: 80 001 753 742)
- The Frank Whiddon Homes of NSW trading as Whiddon (ABN: 49 082 385 091)
- Frank Whiddon Nominees Pty Ltd (ABN: 50 001 332 332)

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 26th November 2024.

Signed – Chair of the Board of Directors:



Leonard Kearns
Director

Document Control

Document Review

Version	Authorisation	Approval date	Effective date
1	FWMH board	14/12/2021	14/12/2021
1.1	FWMH board	13/12/2022	13/12/2022
1.2	FWMH board	12/12/2023	12/12/2023
1.3	FWMH board	26/11/2024	26/11/2024

Summary of Changes

Section	Update
All	Whiddon Statistics updated to reflect FY23 and/or current position
Criteria 3	Graphic changed to group applicable FY23 spend in to high-risk modern slavery categories, as opposed to \$ spent across Whiddon internal spend categories.
Criteria 4	Inclusion of new actions
All	2024 MS Policy statement 2024 Purpose and definition added
Criteria 1 & 2	2024 - Update to reflect governance framework and describe supply chain. FWMH name on front of statement
Criteria 3	2024 - Update to describe risks of MS in Operations
Criteria 4	2024 Inclusion of MS register in mitigation. Development of MS Policy . MS built into governance structure. MS committee to monitor MS risk. Engagement of SME for compliance of suppliers.
Criteria 5	2024 MS assessment included in Environmental and Social Governance Framework being developed. Expanded description of assessment. Chief P&C oversight of breaches
Criteria 6	2024 Statement in regard to MS strategies being embedded into controlled entities



Whiddon