



# Modern Slavery Statement

December 2021

**Whiddon**

**Disclosure Note**

This statement has been made on behalf of The Frank Whiddon Masonic Homes of New South Wales and covers all entities owned and controlled by Whiddon.

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

This statement has been endorsed by Whiddon Board of Directors.

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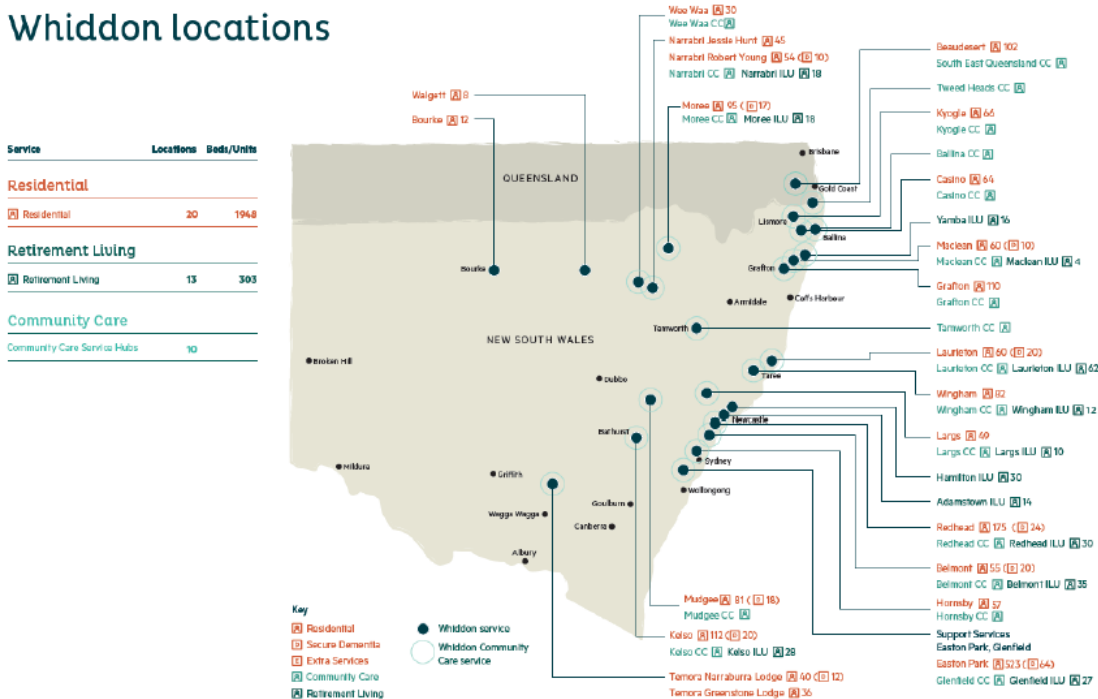
# About Whiddon

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 2,800 customers and over 2,800 employees and 257 volunteers. We're an award-winning aged care provider with residential care, community care and retirement villages across New South Wales and Queensland.

Figure 1. Whiddon Locations

## Whiddon locations



## Our Purpose and Values

At Whiddon we believe in supporting a rich and valued life's journey for people with care needs.

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.

Our MyLife model of care provides the framework for achieving our purpose and is wellbeing focused. The MyLife model of care is delivered through our award-winning relationship-based care approach, which, in partnership with our residents, community care clients, families and communities, ensures true personal connection and tailored care that makes a real difference. The care approach involves a dedicated MyLife Buddy for each resident and client, and a small team of staff who consistently look

after the same residents and clients through a dedicated rostering approach. All care team staff are retrained with heightened communication and engagement skills over a 12-month training program designed in partnership with University of Sydney.

### Our Values

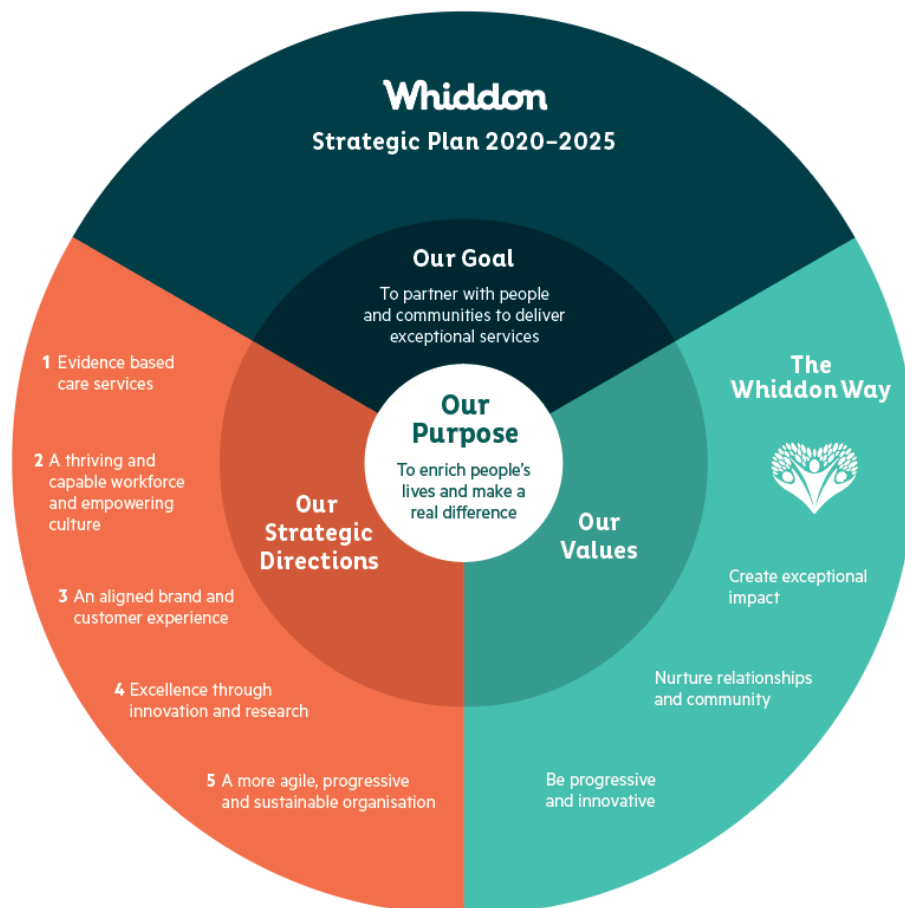
**Be progressive and innovative:** We continually strive to improve what we offer our clients and how we interact with our communities. With a ‘can do’ spirit and attitude, we are open to change and flexible as an organisation. We are brave and passionate about achieving the best outcomes and value creative thinking.

**Nurture relationships and communities:** People are our priority including our clients and their families, our staff and our local communities. Relationship centred care that focuses on partnership, empathy, respect and building trust is at the heart of what we do best. Strong and healthy connections with our local communities with mutual support and collaboration are very important to our clients’ wellbeing and the sustainability of our services.

**Create exceptional impact:** Exceptional impact goes beyond expectations, is highly tailored, accessible and sustainable. It makes a real difference to people’s lives.

### Our Strategic Goals

Figure 2. Whiddon Strategic Plan 2020-2025



## Statement from our Board and Chief Executive Officer

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**Whiddon** is a values-driven organisation that believes in making a real difference.

We acknowledge our responsibility to manage modern slavery risk in our organisation and commit to complying with the provisions in the Commonwealth *Modern Slavery Act 2018*.

We aim to ensure that all aspects of our operations and our extended supply chain are free from modern-day slavery in all its forms. We strive to act ethically and in accordance with laws and conventions both in Australia and overseas that protect workers and people everywhere that are touched by our business activities. We commit to working positively with our suppliers, clients, residents, employees and other stakeholders to assess and address modern slavery risks facing our organisation.

The Board of Directors would like to acknowledge the efforts of Whiddon's Modern Slavery Committee to address this complex issue and prepare our 2021 Modern Slavery Statement.

This Statement was approved by Whiddon Board of Directors on 14 December 2021. The Board will review and update the Statement annually.

Signed by

**Chris Mamarelis (CEO)**

Signed by

**Len Kearns (Board Chairman)**

## Highlights

### 2021 Modern Slavery Risk Management Initiatives

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In 2021 we focused on enhancing our understanding of our modern slavery risks and impacts and developed a detailed Modern Slavery Action Plan to manage risks in our operations and supply chain.

We established a Modern Slavery Committee which is comprised of senior leaders from key areas of our business including Risk and Compliance, Finance, Procurement, Hospitality, Learning and Development and the Property Department.

An analysis of \$48M of procurement spend for potential modern slavery risk enabled us to document and prioritise our Tier 1 (direct) suppliers and supply categories against internationally recognised modern slavery risk indicators. Our Procurement Team will use outcomes of the analysis to prioritise supply chain risk management action and undertake additional due diligence on key suppliers.

We conducted a review of Whiddon's business systems and processes and undertook an operational gap analysis to identify risk and opportunities and enhance our risk management systems. Anti-modern slavery requirements have been incorporated into our standard supplier agreements.

Working with external experts, we developed a practical and comprehensive modern slavery action plan based on gap analysis results with key actions, responsibilities and timeframes documented.

The Modern Slavery Committee worked collaboratively to update our high-level three-year road map published in our 2020 Modern Slavery Statement.

We are in the process of rolling out our first modern slavery training eLearning module to all 2800 staff across 21 locations. The deadline for all staff to complete the Modern Slavery training modules are by end of April 2022.

More details of actions taken are included under Criteria 4 on **Page 20**.

### Our Plans for 2022

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In 2022 we will implement priority Year 3 actions documented in our Modern Slavery Action Plan and continue to raise awareness about modern slavery risks among key internal and external stakeholders. A training needs analysis will further inform professional development programs such as the roll out of three additional modern slavery eLearning modules for Whiddon staff and select suppliers.

The Modern Slavery Committee will work with key stakeholders to continuously improve and update policies, procedures, contract conditions and guidance materials as our understanding of risks evolves.

We will undertake additional due diligence of priority high risk suppliers including analysis of the systems and process they have in place to manage risk in their own supply chains (Tier 2 suppliers). We have met with other Aged Care organisations to take a collaborative approach in conducting a due diligence supply chain analysis of all our key suppliers which we all use across our sector.

Table 1. Action Plan FY 2022

<b><u>Action Plan for FY 2022</u></b>
Roll out additional 3 Modern Slavery eLearning Modules.
Collaborate with other NFP Aged Care Providers to engage and assess priority (shared) Tier 1 suppliers.
Expand supplier engagement initiatives to suppliers used only by Whiddon.
Review compliance with contract clauses and ensure Procurement Policy and Procedures are updated.
Fully intergrate Modern Slavery into Whiddon's Enterprise Risk Framework (WERF).
Establish robust key criteria platforms to risk assess and audit our suppliers when entering into new contracts
Undertake Additional due diligence of suppliers in wider supply chain.
Include targets and KPI's for managing risk into key position descriptions.
Review and update action plan based on ongoing risk assessments

## **Our Plans Beyond 2022**

Beyond 2022 we will review, extend, evaluate and improve our modern slavery risk management program as indicated in the action plan below and some activities could be extended to FY 2024.

Our priority will be to establish performance standards and evaluation criteria for our suppliers, develop and review corrective action plans with identified high risk suppliers and undertake mapping of our priority Tier 2 suppliers where possible.

Table 2. Action Plan FY 2023 and Beyond

<b><u>Action Plan for FY 2023 &amp; Beyond</u></b>
Promote Whistle Blowing policy process in contractor inductions and engagement.
Ensure internal modern slavery risk management reporting requirements / processes are known and used
Formalise Moderns Slavery reporting and remedy processes.
Continue to create internal modern slavery awareness campaigns and programs
Understand Whiddon's Modern Slavery Training Needs Analysis and develop Modern Slavery aware programs.
Incorporate modern slavery education into induction and onboarding process for key management postions and information for all new starts including labour hire contractors
Incorporate modern slavery risk management responsibilities into relevant position descriptions (senior leaders, supply/procurement, facilities managers)
Review and update employee policies, codes of conduct, diversity and inclusion policies etc to include modern slavery awareness and risk management



## Reporting Criteria 1 & 2: Whiddon Structure, Operations and Supply Chain

### Our Organisational Structure

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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.

### Our Governance Framework

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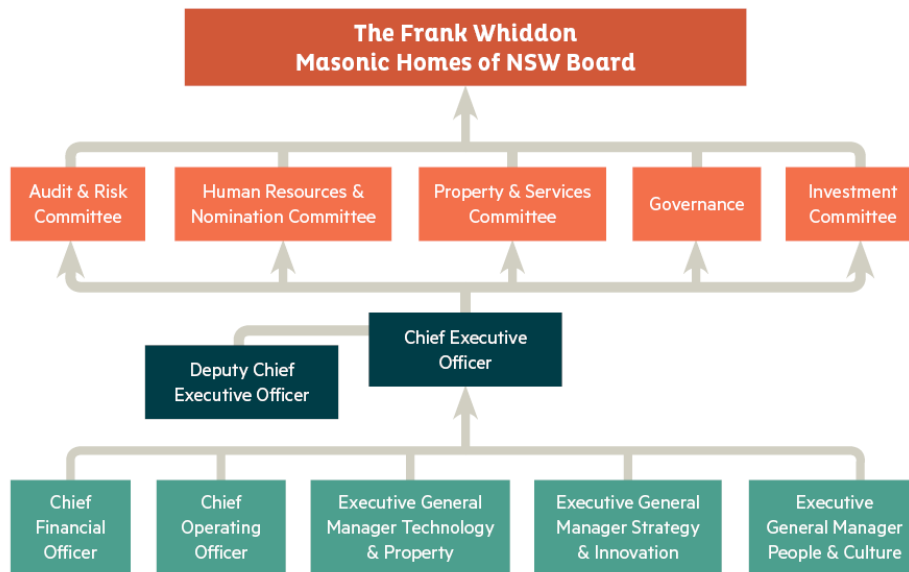
The roles and responsibilities of the Whiddon Board are set out in the Board Charter. Our Board oversees and is accountable for our Modern Slavery Risk Management Program and signs off on our annual Statement. We endeavour to report progress on our modern slavery action plan to our Audit & Risk Committee on a quarterly basis, however the ongoing impact of the COVID-19 pandemic resulted in only limited modern slavery risk reporting in this reporting period. 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 quarterly financial 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 (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.

Figure 3. Whiddon Governance Structure



## Our Policies

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers, that are reviewed regularly. This policy framework ensures that our team members and suppliers clearly understand our expectations, can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint.

Table 1. lists policies are those that are most relevant to preventing and addressing modern slavery among our team members and workers in our supply chains.

Table 3. Key policies relevant to modern slavery

Policy	Purpose
Whistleblowing Policy	Everyone working at Whiddon (and other eligible persons) has the means to speak up and report illegal, unethical or improper conduct as a Whistleblower, without fear of victimisation or personal disadvantage.
Employee Code of Conduct	Our Code 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 processes.
Diversity and Inclusion Policy	This Policy supports our employees to ensure all of our sites and services provide care that is inclusive and that celebrates the diversity of our residents, clients, their families, friends and extended support networks. We strive to create a person centred care environment that

	promotes inclusion and values the diversity that is reflected within our community.
Supply agreements (goods and services)	Our supply agreement reflects the standards and practices we expect from all our suppliers. Broadly this includes an expectation to adhere to a range of safety, reputational and social related requirements, including modern slavery and human trafficking.

## Our 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.



Table 4. Main types of goods and services procured

Goods	Services
Food, beverage and catering	Advertising, media and marketing
Clothing, uniforms and PPE	Allied health services
ICT hardware	Software and network support
Medical supplies and consumables	Professional services and consulting
Office furniture/fittings/supplies	Financial services and advice
Plant and equipment	Property maintenance
Cleaning and laundry products	Plant and equipment maintenance
Vehicles	Travel booking

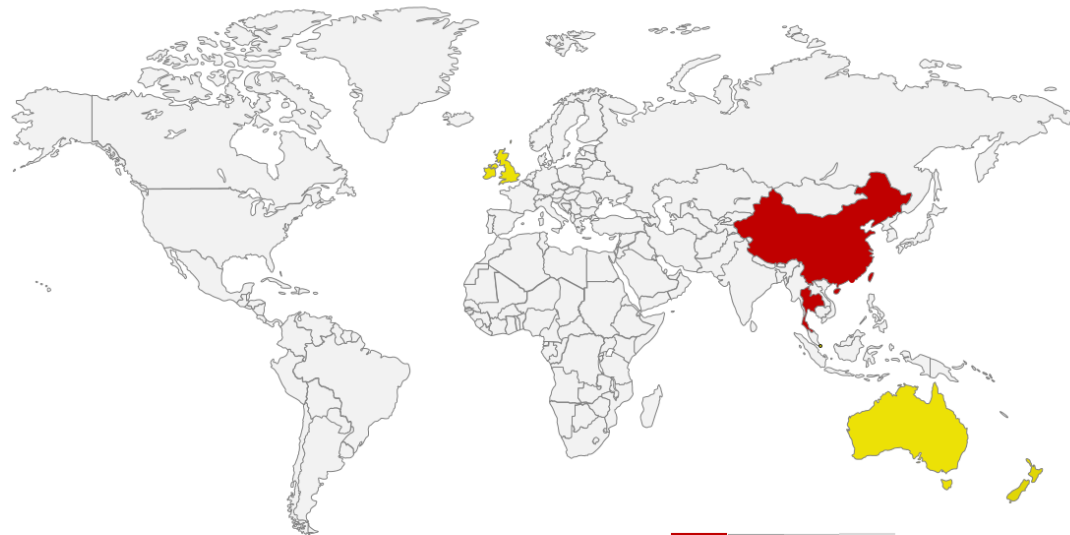
### Where we buy it

We have been able to identify the geographic location of approximately 40% of all suppliers of goods and services (252 suppliers) used in our modern slavery risk analysis. 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.

We will work with our direct (Tier 1) suppliers to better understand the origin of the goods we procure and work towards documenting our extended supply chain. The map on the following page provides an overview of the known geographic locations of our suppliers, number of suppliers, percent of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies country risk rating tool.

## Whiddon – Global Supply Chain

Unknown country of origin \$35M / 60% Total spend



Modern Slavery Country Risk Rating



© SD Strategies Modern Slavery Risk Index

Map represents total FY2021 procurement spend

\* Top five spend categories only

**Great Britain**

1 supplier

<1% of total spend

- > Allied health services

**China**

4 suppliers

4% of total spend

- > Medical supplies and consumables
- > Cleaning and laundry products
- > Clothing, uniforms and PPE

**New Zealand**

1 supplier

<1% of total spend

- > Allied health

**Australia**

117 suppliers

34% of total spend

- > Advertising, media and marketing
- > Medical supplies and consumables
- > Food, beverage and catering
- > Building and construction
- > ICT hardware
- > ICT software and networking services
- > Advertising and marketing services
- > Property and facility maintenance
- > Office supplies
- > Professional services and consulting
- > Plant and equipment
- > Clothing, uniforms and PPE
- > Utilities

**Thailand**

1 supplier

1% of total spend

- > Cleaning and laundry products

## Reporting Criteria 3: Modern slavery risks in operations and supply chain

Our focus in 2021 was on enhancing our understanding of modern slavery risks in our operations and supply chain and to focus our due diligence efforts on our highest priority Tier 1 (direct) suppliers.

### Operational risks

With the support of SD Consulting Pty Ltd, we undertook a modern slavery gap analysis that included participation from members of our Modern Slavery Committee, including representatives from Risk and Compliance, Finance, Procurement, Hospitality, Learning and Development) and the Property Department and the CFO.

The purpose of this initial workshop was to:

- Identify gaps in our systems and processes that may increase our exposure to modern slavery risks in our operations and supply chains
- Identify opportunities to improve and enhance our systems and processes
- Inform the development of our modern slavery risk management program

### Supply Chain risks

In the 2020 reporting period we identified several potentially high-risk spend categories in our top ten categories by spend. In this reporting period we focussed on more accurately profiling potential risk across Whiddon's supply chain, obtaining a deeper understanding of risk associated with our priority Tier 1 suppliers and developing a range of operational processes to manage those risks. We engaged external expertise to help us document, assess and prioritise our Tier 1 (direct) suppliers against modern slavery risk indicators and identified our top five highest risk procurement categories.

## OPERATIONAL RISKS

### Modern Slavery Gap Analysis

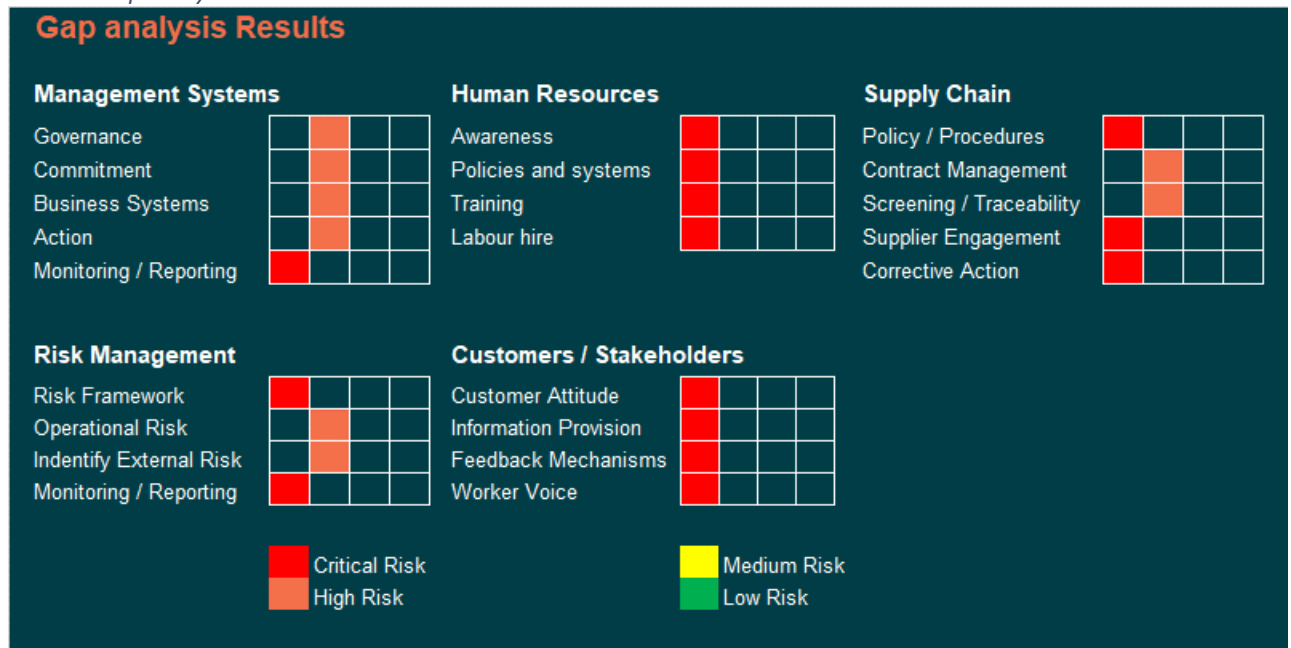
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The Modern Slavery Committee participated in a facilitated gap analysis to identify areas of improvement across five key categories:

- Management systems
- Human resources and recruitment
- Procurement and supply chain
- Risk management
- Customers and stakeholders

The analysis identified gaps and opportunities for better managing our response to modern slavery risks and human rights matters more broadly. We acknowledge that we are at the beginning of our modern slavery journey and recognise that there is much work to do. The gap analysis has enabled us to better understand the essential elements of an effective modern slavery risk management program and expand our existing governance and ethical sourcing programs to better capture and respond to these risks. Table 5 below provides the results of our modern slavery gap analysis identified with the Whiddon Modern Slavery Committee.

Table 5. Gap analysis results



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.

Importantly, our Board and leadership team is committed to identifying and addressing modern slavery risks in our operations and supply chain and have committed resources to this process.

The results of the Gap Analysis informed our Modern Slavery Action Plan which was developed collaboratively with key representatives across our organisation. The action planning process has helped us refine and focus the three-year Modern Slavery Roadmap outlined in our 2020 Modern Slavery Statement. More information on the action plan and roadmap are included in Criteria 4 ‘Actions Taken to Assess and Address Risk’.







## Supply Chain Risks

### High level findings

Just over half (56%) of our procurement spend is potentially high risk for modern slavery.

Our highest potential risk spend categories include:

Figure 4. Highest Risk Categories

 <p>Food, beverage and catering supplies</p>	 <p>Medical equipment and consumables</p>	 <p>Property and facility maintenance</p>
 <p>Building and construction services</p>	 <p>ICT hardware</p>	 <p>Plant and equipment</p>

### Supply Chain Overview

Our procurement team, supported by external experts, analysed close to \$48 million of procurement spend against four key modern slavery risk indicators:

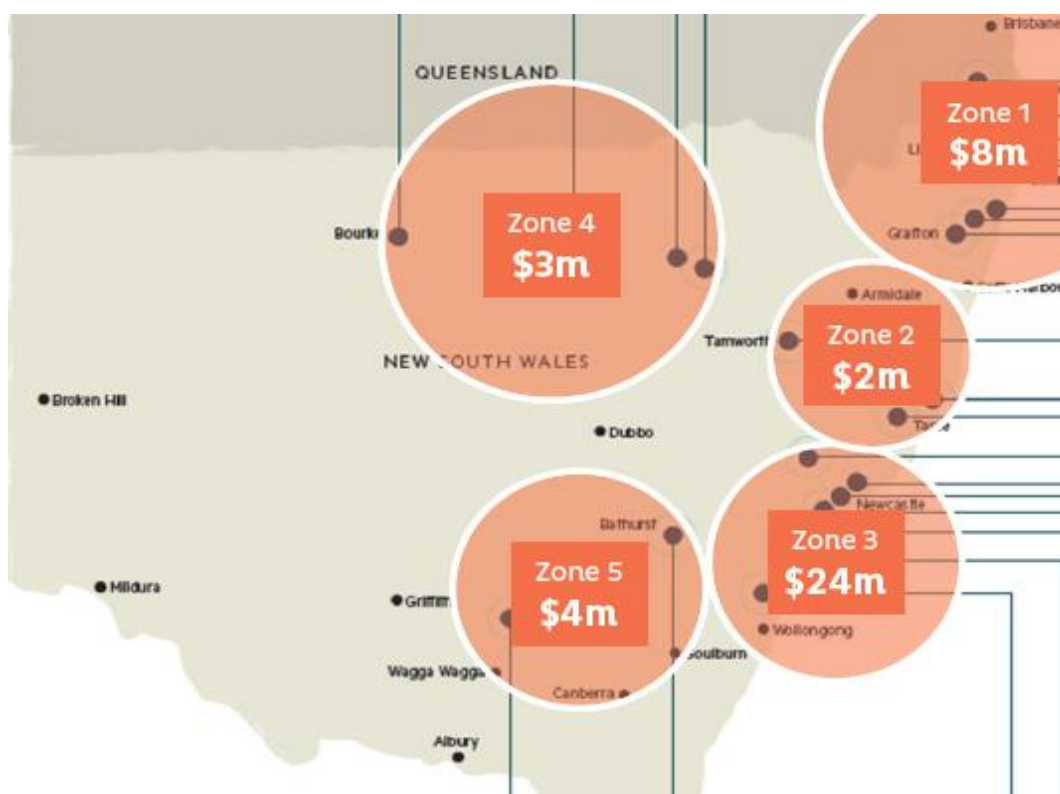
- **Industry sector** – Specific industry sectors (for example manufacturing, ICT, construction, facilities management etc) deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 *List of Goods Produced by Child and Forced Labor*, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support



our program. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters which may have elevated risk of poor labour standards and modern slavery.

- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where children, low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘4D’ work (Dirty, Dull, Degrading or Dangerous).

Figure 5. Annual Regional Spend



### Data at a Glance

Table 6. Data at a Glance

Total Spend analysed for Risk	\$ 47,826,478
Total Suppliers analysed (and categorised)	249
Supplier Spend Range (smallest to largest)	\$650 - \$2.58m
Number of Spend Categories (goods and services)	18

Important note: Our focus in 2021 has been on understanding risks posed by higher spend Tier 1 suppliers. We recognise that there may be risk amongst our lower spend suppliers and our extended supply chain and will incorporate these into future risk assessments.

### Risk by Spend

Analysis of close to \$48 million of spend across our operations identified, 56% of spend as potentially high risk for modern slavery (Figure 6). This is largely due to our spend on food, beverage and catering supplies and other higher risk supply categories (see below).

A further 27% of spend was categorised as medium risk for modern slavery and 10% as lower risk.

### Risk by Supplier Number

Analysis of suppliers indicates that 153 (or 62%) of the 249 suppliers assessed are potentially high risk for modern slavery (Figure 7).

Whilst some of our direct suppliers based in Australia may represent a lower risk, goods and services procured from many of our Australian suppliers are sourced from countries with a higher risk for modern slavery.

We will continue to gather data on the provenance of goods and services Whiddon uses. This will enable us to gain a better understanding of potential risk in our extended supply chain both in Australia and internationally, prioritise the engagement of high-risk suppliers and take

Based on the four risk factors outlined above, nine (or 50%) of our 18 spend categories are potentially high risk for modern slavery (Figure 8).

Six categories account for 98% of high risk spend in our supply chain:

- Food, beverage and catering supplies
- Medical equipment and consumables
- Property and facility maintenance
- Building and construction services
- ICT hardware (laptops, monitors etc)
- Plant and equipment

Figure 6. Risk by Supplier Spend

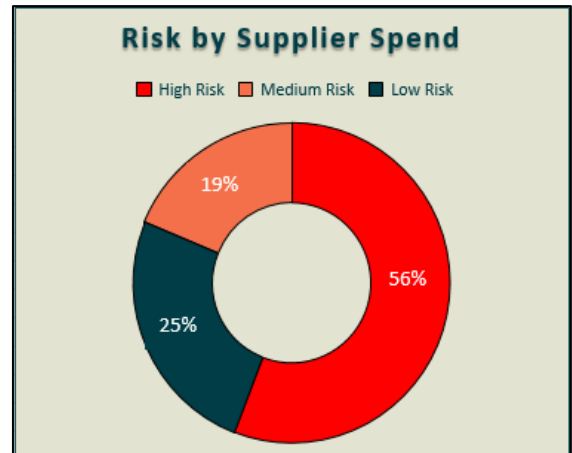
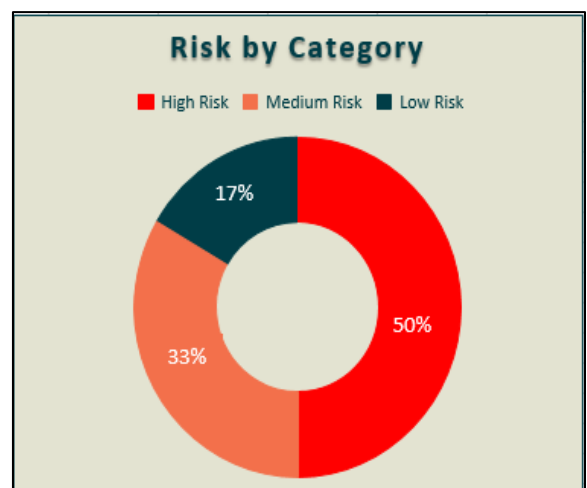


Figure 7. Risk by Supplier Numbers



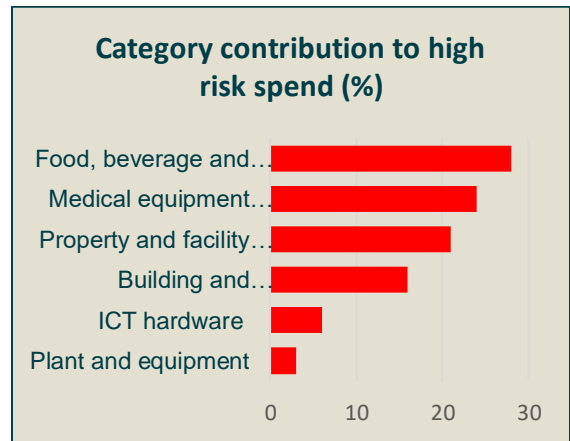
Figure 8. Risk by Category



The relative contribution of each of these categories is summarised in Figure 9.

Higher levels of modern slavery risk associated with these spend categories is due to country of manufacture (primarily China and parts of Asia), the industry sectors involved (agriculture, food processing and manufacturing) and commodities (food, ingredients, plastic, chemicals, fabric etc).

Figure 9. Category Contribution

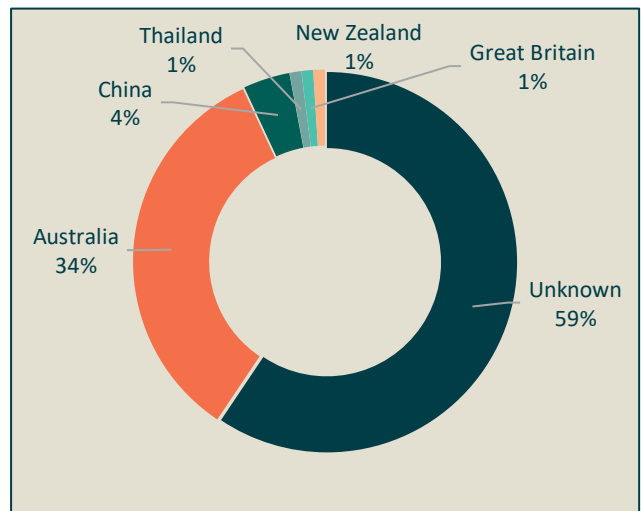


**Risk by location of supplier**

We have identified the geographic location of approximately one third of the 252 suppliers analysed for modern slavery risk, equating to 41% of our total spend.

Whiddon’s exposure to modern slavery risk due to location of these supplier is low with only five percent (5%) of goods and services sourced from known suppliers in countries with higher levels of modern slavery risk (Figure 10).

Figure 10. Global Supplier Risk



Goods sourced from suppliers located in China (4% of total) and Thailand (1% of total) include medical supplies and consumables, cleaning and laundry products and clothing, uniforms and PPE.

*Note that this result is based on 41% of total spend analysis and is based on limited knowledge of Tier 1 suppliers only.*

## Reporting Criteria 4: Actions taken to assess and address risk

Our modern slavery gap analysis above informed the development of our modern slavery action plan and enabled us to update our three-year road map.

### Modern slavery action plan and road map

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Our cross-disciplinary Modern Slavery Committee, which included representatives from our Leadership Team, worked collaboratively to develop a focused modern slavery action plan and to update of our three-year road map. Our action plan includes actions for enhancing our approaches to modern slavery governance, due diligence, risk and compliance; procurement and supply chain systems and processes; supplier engagement; HR and recruitment; and modern slavery awareness, training and communications (both internally and externally).

The following actions were completed in this reporting period.

#### Modern Slavery Committee

We formalised our Modern Slavery Committee which includes representatives from procurement, people & culture, risk and operations. Guided by our Executive sponsor, the Committee will lead Whiddon's modern slavery risk management program and coordinate the implementation of our action plan and road map.

#### Leadership Team engagement and training

We have provided our Board and Leadership Team with information to raise awareness of modern slavery and relevance to our supply chain and operations. Since the initial engagement in 2019, we have continued to communicate and engage across our internal stakeholders.

To maintain momentum and monitor the rollout of our program, modern slavery will be reported to the Board as part of the quarterly progress report and communicated via management reporting.

#### Staff Training

We rolled out the first of four modern slavery awareness eLearning modules in October 2021 targeting key staff in the Support Services team. The first module provided a broad overview of modern slavery, including the different forms of slavery and its relevance to businesses in Australia and globally.

Additional eLearning modules will provide information on modern slavery in the workplace (including identifying vulnerable workers), supply chain red flags and the prevalence of modern slavery in Australia.

Modules will be made available to a wider range of staff across the Whiddon network in 2022/2023, supplemented with additional training or education resources where required. All staff can access a range of information material on the issue, including details of our modern slavery risk management initiatives through Whiddon's staff intranet site.

### Document review

We undertook a broad review of our policies and procedures and identified opportunities to incorporate modern slavery risk management into existing policy frameworks and operational processes. Policies and procedures will continue to be developed and/or refreshed in collaboration with policy owners.

### Modern Slavery Gap Analysis

With the support of external consultants, we conducted a review of our systems and processes and undertook an operational gap analysis to identify risk and opportunities and enhance our risk management systems. Results of our Gap Analysis are included under reporting Criteria 3.

### Modern Slavery Action Plan

The Modern Slavery Committee developed a practical and comprehensive modern slavery action plan which includes a high-level three-year road map that will inform our risk management approach moving forward. Please refer to page 7 and 8 of this document for the detailed plan for the first two years. Our Plan includes actions addressing gaps in our governance and due diligence processes, risk management, supply chain management, supplier engagement, HR and recruitment, and training and communications.

### Risk Framework

To better integrate modern slavery risk management across our operations, we reviewed the risk assessment matrix included in our Whiddon Enterprise Risk Framework ('WERF') and are developing a specific human rights and labour rights category to be included in the risk assessment matrix. We have a dedicated tool (EQstats) for capturing incidents within our organisation which include modern slavery incidents and will integrate data into regular reporting processes.

### Supplier Risk Identification and Prioritisation

We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified six high-risk procurement categories (see Criterion 3 'Modern slavery risks in operations and supply chains' above). We will work with key suppliers to better understand potential risk and, based on the outcome of this engagement, undertake further due diligence where necessary.

## Modern Slavery Roadmap

While our focus for year 1 was on establishing a management framework for operational and supply chain modern slavery risks, for this reporting period we focussed on implementing priority actions and enhancing our due diligence processes to manage risk. Year 3 will focus on expanding actions undertaken during this reporting period, monitoring and reviewing progress as part of our commitment to continual improvement. Please refer to table 1 and 2 on Page 7 and 8 for the detailed action plan for FY 2022 and beyond that forms part of our Review.

Table 7. Modern Slavery Roadmap

<b>Year 1 (2020)</b> <b>Establish Management Framework</b>	<b>Year 2 (2021 – this report)</b> <b>Expand Due Diligence Program</b>	<b>Year 2 (2021 – this report)</b> <b>Expand Due Diligence Program</b>
<ul style="list-style-type: none"> <li>▪ Established a Modern Slavery Committee</li> <li>▪ Undertook initial Gap Analysis to understand opportunities for improvement</li> <li>▪ Engaged and educated Leadership Team and Board</li> <li>▪ Developed broad modern slavery staff awareness program</li> <li>▪ Collaborated with other aged care providers to develop Modern Slavery Guidelines</li> <li>▪ Added modern slavery and human rights criteria into tender processes</li> <li>▪ Updated Supplier Code of Conduct to reflect ethical sourcing and modern slavery risk management requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Expanded modern slavery gap analysis across all business operations</li> <li>▪ Documented and prioritised Tier 1 suppliers against key modern slavery risk indicators</li> <li>▪ Established internal due diligence processes to review supplier risk</li> <li>▪ Implemented modern slavery specific supplier contract clauses</li> <li>▪ Educated Whiddon business units on identifying and reporting modern slavery risk (rolled out first eLearning module)</li> <li>▪ Undertook ongoing reviews of risk strategies, training, engagement of external stakeholders and internal processes</li> <li>▪ Updated modern slavery action plan and road map.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Roll out additional three modern slavery eLearning modules</li> <li>▪ Collaborate with other NFP aged care providers to engage and assess priority (shared) suppliers</li> <li>▪ Expand supplier engagement initiatives to suppliers used only by Whiddon</li> <li>▪ Review compliance with contract clauses</li> <li>▪ Fully integrate modern slavery into WERF.</li> <li>▪ Establish robust key criteria platforms to risk assess and audit our suppliers when entering into new contracts.</li> <li>▪ Undertake additional due diligence of suppliers in wider supply chain.</li> <li>▪ Include targets and KPIs for managing risk into key position descriptions</li> <li>▪ Review and update action plan based on ongoing risk assessments</li> </ul>

## Reporting Criteria 5: Effectiveness Assessment

The measures taken to date establish a continuous improvement process to develop internal capabilities and iteratively improve our systems and processes.

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 Risk Committee

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





### Monthly Review – Modern Slavery Committee and Leadership Team

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.

## Effectiveness indicators 2020

For 2020, we developed a set of process indicators to track the implementation of our modern slavery risk management program. These are included below:

Table 8. Effectiveness Indicators 2020

Indicator or target	In progress	Completed
Formalised Modern Slavery Committee		
Engaged and updated Board, Leadership Team and key staff on modern slavery broadly and legislative reporting requirements		
Modern slavery gap analysis completed		
First modern slavery eLearning module rolled out to staff		
Completed a review and risk prioritisation of all Tier 1 suppliers		

Completed Modern Slavery Action Plan and update three-year Road Map		
Incorporated modern slavery into enterprise risk management framework (WERF)		
Established internal due diligence identification, management and reporting systems		
Engaged all Tier 1 potentially high-risk suppliers on Whiddon modern slavery program		

We assessed the effectiveness of our actions against the following measures:

Table 9. Effectiveness Measures

Focus area	Example activity	Effectiveness Assessment
Risk and governance	Board and executive engagement Reviewed Whiddon Enterprise Risk Framework (WERF)	Regular oversight on progress against modern slavery risk management plan by Modern Slavery Committee and legal/compliance function Quarterly reports to executive and board committees
Procurement and supply chain	Supplier risk prioritisation Supplier KPIs and contract evaluation criteria Supplier engagement and due diligence	Regular oversight on progress against modern slavery risk management plan by Modern Slavery Committee and legal/compliance function Quarterly reports to executive and board committees
Procurement and supply chain	Supplier risk prioritisation Supplier KPIs and contract evaluation criteria Supplier engagement and due diligence	Update of supplier risk profile Building greater understanding of potential modern slavery risks in our supply chain
Awareness and Training	Modern slavery training needs analysis Awareness raising communications eLearning packages	Understanding of who needs to be trained on what aspects of modern slavery risk management Percentage of staff completing modern slavery eLearning training module(s) Increased awareness and training to staff and senior managers
Grievance and Reporting	Update Complaints Register and Incident Management Process to include specific category for modern slavery grievances	Understanding of who needs to be trained on what aspects of modern slavery risk management Percentage of staff completing modern slavery eLearning training module(s) Increased awareness and training to staff and senior managers



## Reporting Criteria 6: Process of consultation with entities owned or controlled

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

Frank Whiddon Nominees Pty Ltd	50 001 332 332
The Frank Whiddon Masonic Homes Foundation Ltd	80 001 753 742

## Reporting Criteria 7: Other

### COVID-19 considerations

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As the pandemic evolves Whiddon continues to honour its current agreements with key suppliers and in collaboration with other Aged Care Providers, Whiddon continues to engage and source additional suppliers to assist with the high demand and provision of critical PPE products required for Aged Care.

Whiddon endeavours to embed the process of ethical sourcing during the pandemic and ensure supplier compliance with Modern Slavery requirements. To date, lockdown restrictions have impacted supplier and contractor access to Whiddon facilities unless it was deemed an essential service by a third party.

Whiddon also continues to support frontline employees during the pandemic.

The impact of COVID-19 resulted in the reliance of completion of mandatory education and training via online learning modules.

## STATEMENT ANNEXURE

### Principal Governing Body 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 14 December 2021.

### Signature of Responsible Member

This modern slavery statement is signed by the **Chairperson of the Board of Directors** on page 6 of this document.

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Table 10. Mandatory Criteria

Mandatory criteria	Page number/s
a) Identify the reporting entity	9
b) Describe the reporting entity’s structure, operations and supply chains.	9
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	14
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	20
e) Describe how the reporting entity assesses the effectiveness of these actions.	23
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	25
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	25

## ANNEXURE OF MODERN SLAVERY TERMS AND DEFINITIONS

Table 11. Modern Slavery Terms and Definitions

Modern Slavery	Modern Slavery is a term used to cover a range of exploitative practices including human trafficking, slavery, forced labour, child labour, debt bondage, forced marriage and any other forms of slavery-like practices.
Child Labour	Any institution or practice whereby a child or young person under the age of 18 years, is delivered by either or both of his natural parents or by his guardian to another person, whether for reward or not, with a view to the exploitation of the child or young person or of his labour.
Debt Bondage	Occurs when the victim pledges their services or the services of a third person as security for a real or purported debt where this debt is: manifestly excessive; or the reasonable value of their services is applied to the debt; or the length and nature of their services are not limited or defined.
Forced Marriage	Occurs when the victim gets married without freely and fully consenting because they have been coerced, threatened or deceived or because they are incapable of understanding the nature and effect of a marriage ceremony.
Forced Labour	Occurs when the victim does not consider themselves free to cease providing their labour or services OR to leave their place or area of work because of the use of coercion, threats or deception.
Human Trafficking	Occurs when the victim does not consider themselves free to cease providing their labour or services OR to leave their place or area of work because of the use of coercion, threats or deception.
Servitude	Occurs when the victim does not consider themselves free to cease providing their labour or services OR to leave their place or area of work because of the use of coercion, threats or deception. To be in a condition of servitude, the victim must also be significantly deprived of their personal freedom.
Slavery	Occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.