

# Modern Slavery Statement

The Frank Whiddon Masonic Homes of  
NSW

*(trading as Whiddon)*

ABN: 49 082 385 091

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**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 meaningful difference in the communities we serve.

To fulfil this purpose, we recognise our responsibility to operate ethically, transparently, and sustainably, with a clear focus on our Environmental, Social and Governance (ESG) obligations.

Modern slavery is fundamentally incompatible with our values. We are continuing to strengthen our approach to identifying, managing, and mitigating modern slavery risks across both our operations and our extended supply chains. While the risk within our direct workforce is considered low due to the highly regulated nature of the Australian aged care sector and our strong governance over employees, contractors, and outsourced services, we acknowledge heightened risk within our supply chain, where visibility and influence may be limited across multiple tiers.

Oversight of modern slavery risk management is led by Whiddon's Executive Leadership Team and governed by our Board of Directors. We view the prevention of modern slavery not only as a moral and human rights obligation, but as an essential component of legal compliance, ethical stewardship, and long-term organisational sustainability.

During the 2025 reporting period, our modern slavery strategy focused on the following key actions:

1. Establishing Key Performance Indicators (KPIs) to monitor modern slavery risk, accountability, and supplier compliance.
2. Strengthening supplier governance through the consolidation of commercial contracts and the implementation of enhanced controls, due diligence measures, and improved visibility across procurement arrangements.
3. Engaging a 3<sup>rd</sup> party specialist to carry out a Modern Slavery Assessment, designed to assess our key suppliers for modern slavery risks including: geography, downstream supply chain management, labour policies and employment practices.

Further detail on these initiatives is outlined within this Modern Slavery Statement, prepared in accordance with the Modern Slavery Act 2018 (Cth).

**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.<sup>1</sup>

Through this statement, Whiddon aims to articulate its support and commitment to the Modern Slavery Act 2018, to combat modern slavery and protect 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 a grave violation of human rights and an exploitation of a person's dignity, freedom, and wellbeing. It encompasses practices such as human trafficking, servitude, forced labour, forced marriage, debt bondage, deceptive recruitment, child labour, and wage theft. Each of these practices is recognised as a serious crime under Australian law, as well as under international conventions to which Australia is a signatory.

Whiddon maintains a zero-tolerance approach to all forms of modern slavery and related human rights abuses. We are committed to acting ethically and responsibly in all aspects of our operations and supply chains, ensuring that risks are identified, assessed, and addressed through strong governance, transparent procurement processes, and continuous monitoring.

Our commitment includes:

- Embedding modern slavery risk management within Whiddon's governance and Enterprise Risk Frameworks;

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<sup>1</sup> Walk Free (2023). *Global Slavery Index 2023*. Minderoo Foundation. Available at: <https://www.globalslaveryindex.org/2023/findings/country-studies/australia/>

- Applying supplier due diligence, contract controls, and audit processes to ensure compliance with the Modern Slavery Act 2018 (Cth);
- Providing mandatory training to staff involved in procurement, recruitment, and frontline service delivery;
- Maintaining access to confidential reporting and whistleblowing channels to ensure concerns can be raised safely;
- Taking remediation action where modern slavery practices are identified, prioritising the rights and safety of affected individuals.

Through these measures, Whiddon is committed to continuous improvement in preventing, detecting, and responding to modern slavery. We recognise that safeguarding human rights is not only a compliance obligation but a reflection of our core purpose — to enrich people’s lives and make a real difference.

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

### About Whiddon

Whiddon is an award-winning aged care and disability services provider that has been enriching the lives of older Australians for more than 75 years.

From our philanthropic beginnings, we have grown into a leading not-for-profit organisation, caring for more than 2,700 residents and clients across residential aged care, home care, disability care, and retirement living villages.

Our services are delivered throughout metropolitan, regional, rural, and remote communities in New South Wales and Queensland, reflecting our deep commitment to accessibility and community presence.

Whiddon employs more than 3,100 dedicated staff who take pride in delivering high standards of care and support.

Our people are at the heart of our success, and their commitment ensures that we consistently meet the needs of those we serve.

Guided by our purpose — *to enrich people’s lives and make a real difference* — we foster strong community connections and a sense of belonging across all our locations. At Whiddon, we believe that wherever we may be, everyone matters.

## Whiddon locations

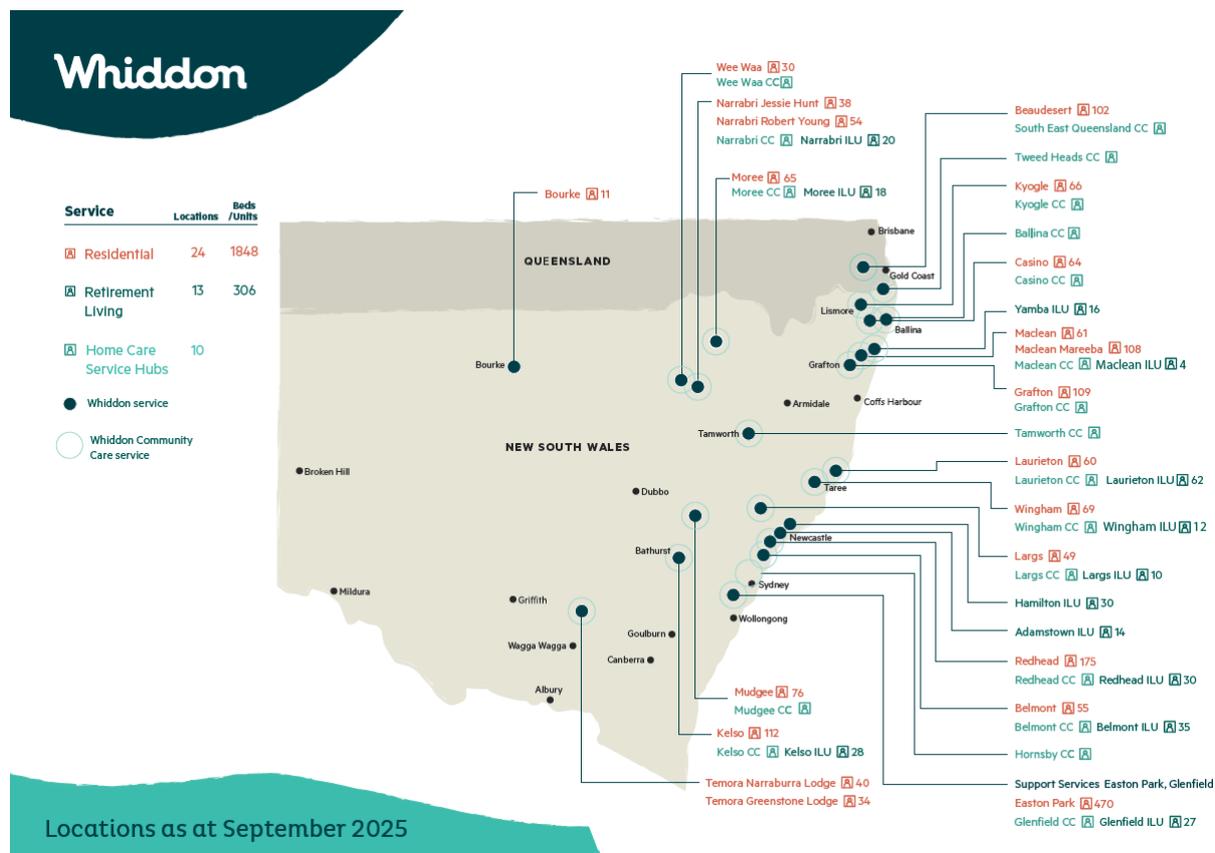


Figure 1 Whiddon Locations

## 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.

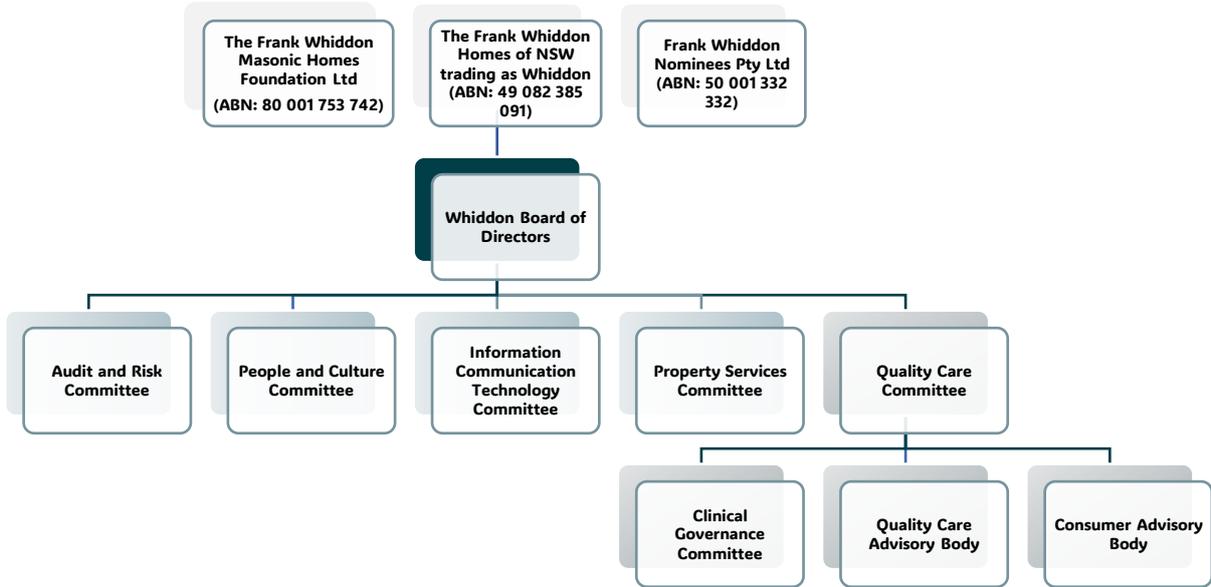
The Whiddon Board has delegated authority to the CEO and the Executive Team to oversee, monitor and manage the organisation's day-to-day operations including the risk management of modern slavery.

### Organisation Structure and Governance

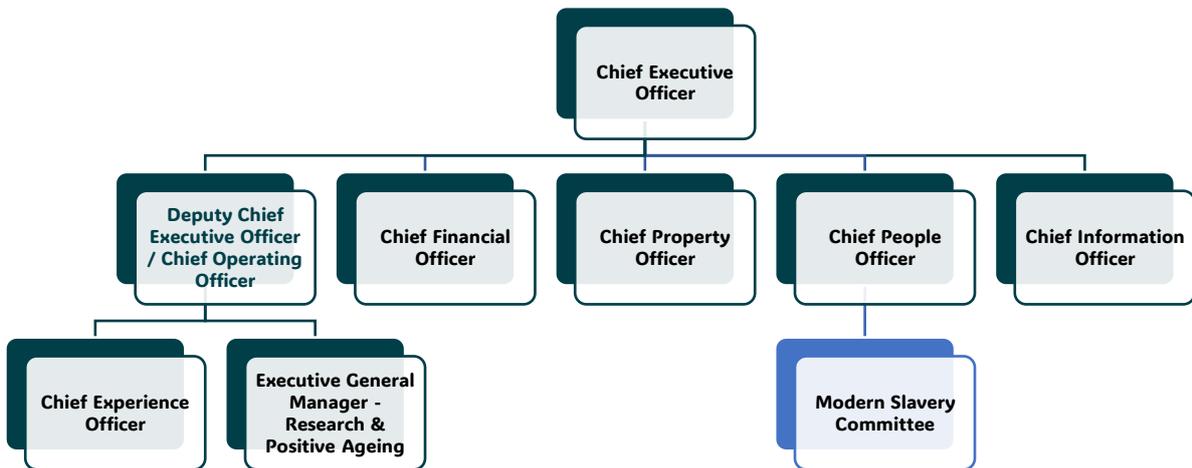
The Organisation is structured into several key divisions, each led by a senior executive who reports to the CEO. This structure facilitates efficient decision-making and operational effectiveness. Our governance framework includes a robust set of policies and practices overseen by the Board of Directors, 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, home 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:

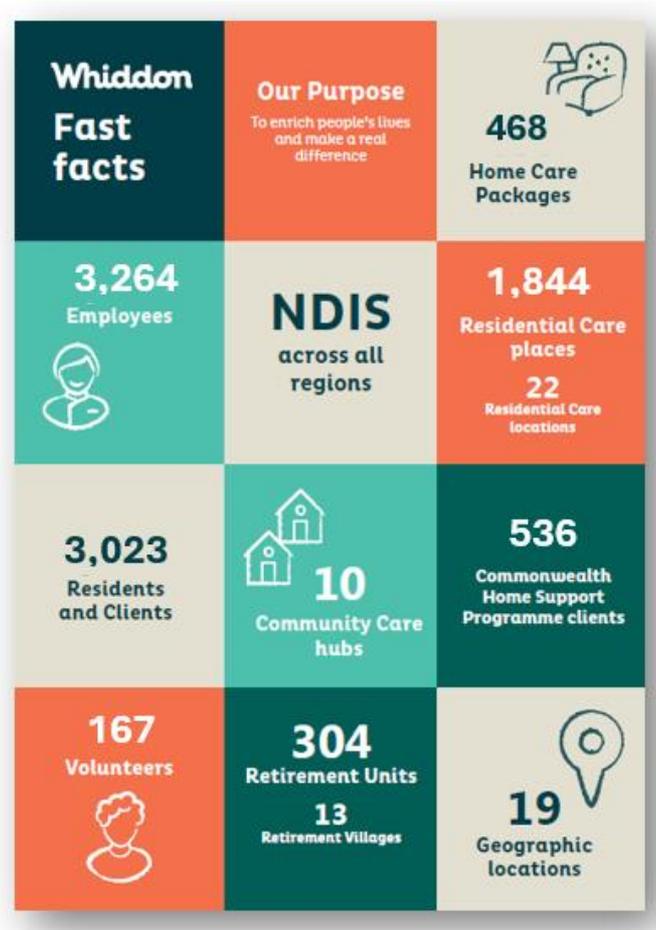


Figure 2 Whiddon Quick Facts

In 2025, there were 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 contracted 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 relies on a broad range of suppliers to deliver aged care, disability, and retirement living services across our business streams. Our supply chain includes providers of medical equipment, pharmaceuticals, food and catering, personal care items, ICT equipment, and agency staffing services.

We engage in structured procurement processes — sourcing, contracting, and ongoing supplier management — to ensure a consistent supply of safe, high-quality, and cost-effective goods, services, and personnel. All procurement activities are guided by fair, transparent, and ethical practice, supported by our Environmental, Social and Governance (ESG) Strategy.

To safeguard the wellbeing of our consumers and workforce, Whiddon:

- Manages recruitment, induction, and ongoing orientation of agency personnel engaged through third-party providers;
- Applies quality assurance checks and supplier monitoring to confirm that products, services, and personnel meet required safety, legal, and consumer standards;
- Complies with all regulatory requirements for the procurement, storage, and distribution of goods and services;
- Integrates modern slavery risk assessment criteria into supplier onboarding, contract negotiation, and review processes.

We recognise that, while many of our direct suppliers are based in Australia, some products including medical consumables, food ingredients, and ICT equipment are sourced through global supply chains. These supply chains carry a higher risk of modern slavery due to reduced visibility of lower-tier suppliers.

To address these risks, Whiddon monitors agency workforce arrangements, consolidates supplier contracts to improve oversight, and reports annually on our actions to identify, assess, and mitigate modern slavery risks in our operations and supply chain.

## 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 contracts 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.

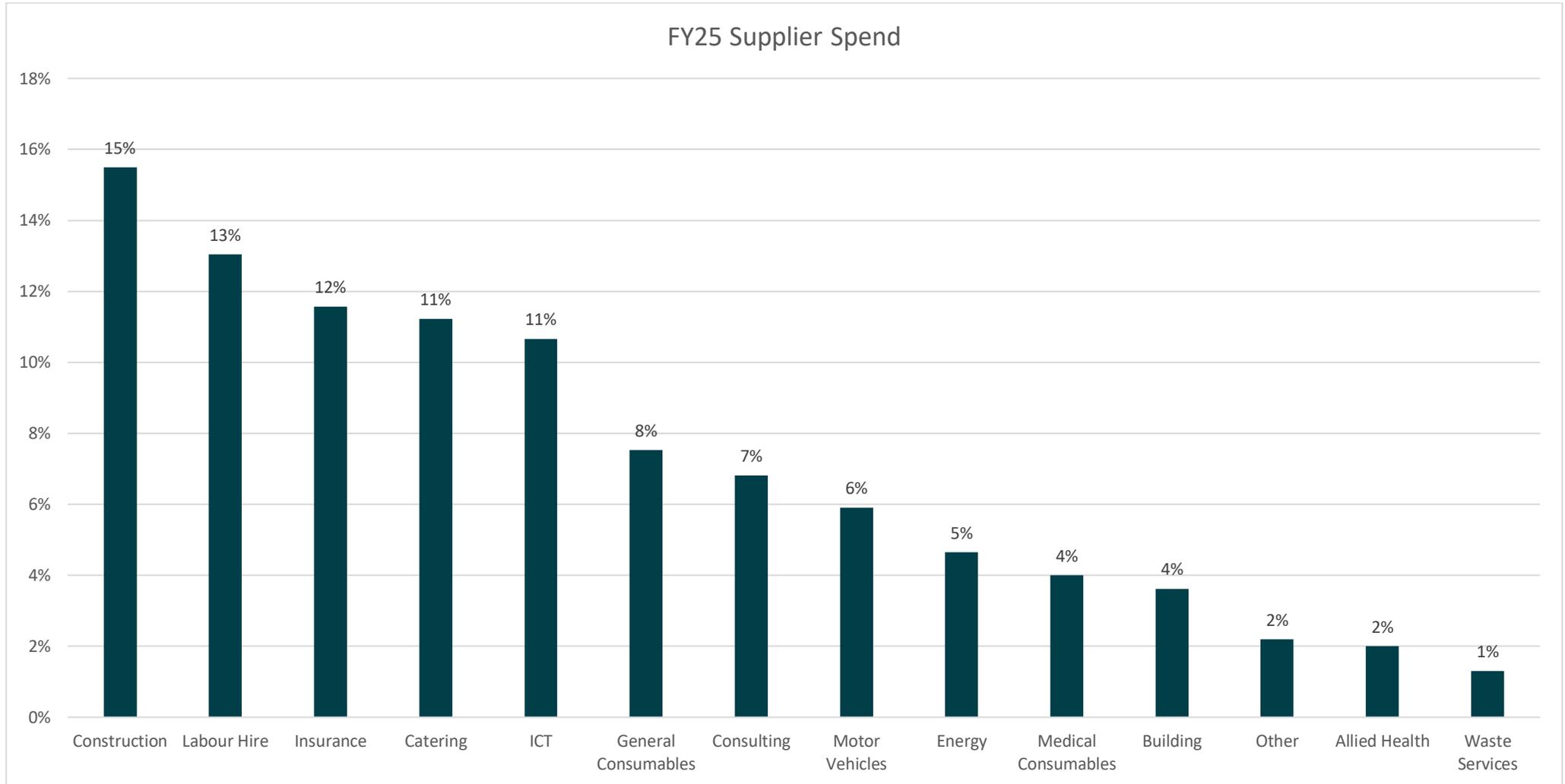
### High Risk Supply Chain Categories

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 25, **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 in compliance with the Modern Slavery Act. New items in 2025 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.

Where modern slavery practices are identified within our operations or supply chains, Whiddon will implement a structured Remediation Framework. This framework includes:

- Immediate safeguarding of any affected individual;
- Referral to specialist support services as soon as possible ;
- Collaboration with suppliers to rectify breaches where possible;
- Termination of relationships with suppliers who fail to address breaches;
- Reporting of confirmed cases to relevant regulators and law enforcement.

Progress on remediation actions will be documented and reviewed by the Modern Slavery Committee and reported to the Board.

#### 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.

### Employment Practices and Workforce Monitoring

Whiddon is strengthening internal processes to detect and prevent potential exploitation within its own workforce. Review of business processes for employment and payroll practices are being undertaken to confirm that the names associated with bank account details for wage payments correspond to the employed individual.

Any inconsistencies identified are investigated in accordance with Whiddon's modern slavery and safeguarding procedures, with appropriate corrective action taken where required.

### 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.

In addition to collaboration with government, Whiddon will actively engage with industry networks, advocacy organisations, and NGOs specialising in labour rights and anti-slavery. This includes participating in aged care and disability sector working groups, contributing to multi-stakeholder forums, and sharing best practice approaches with peer providers.

## Third Party Management and Procurement

### Service and Supply Agreement Terms

We have engaged a subject matter expert external party to assess our top 50 suppliers by expenditure and all labour hire companies that we engage with to assess the supplier on their compliance with the Modern Slavery Act. This includes assessing for modern slavery risks including geography, downstream supply chain management, labour policies and employment practices. This information will be used to determine ongoing relationships and engagement with the supplier. Assessment results will be available in December 2025.

Our standard contract terms and conditions has been updated to incorporate the framework outlined in the legislation. This change has ensured compliance by our suppliers and contractors with 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 2025, 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 level 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.

To strengthen transparency, Whiddon has introduced measurable Key Performance Indicators (KPIs) to assess effectiveness:

- Percentage of high-risk suppliers assessed annually;
- Percentage of contracts with modern slavery clauses;
- Percentage of staff completing annual modern slavery training;
- Number of modern slavery reports received and addressed;

These indicators will be reviewed annually by the Modern Slavery Committee, reported to the Executive Leadership Team, and presented to the Board as part of the annual Statement approval process.

#### 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

Looking forward, Whiddon will expand its modern slavery program by:

- Embedding modern slavery risk indicators into supplier onboarding systems;
- Extending supplier audits beyond the top 50 by spend to include high-risk categories irrespective of spend;
- Strengthening ESG reporting including modern slavery KPIs in Whiddon’s ESG strategy

- Incorporating lessons learned from remediation cases into policy and training updates.

## 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 9th December 2025.

The Board reaffirms its zero-tolerance approach to modern slavery and commits to reviewing progress annually, ensuring that Whiddon’s governance and operational controls remain effective, transparent, and aligned with both the Modern Slavery Act 2018 (Cth) and international best practice.

**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
1.4	FWMH board	09/12/2025	09/12/2025

### Summary of Changes

Section	Update
All	Whiddon information updated to reflect current position
Policy Statement	Expanded to detail commitment
Criteria 3	Graphic updated to reflect current status
Criteria 4	Inclusion of structured remedial framework. Addition of further engagement with industry Modified Auditing paragraph to reflect 'Employment Practices and Work Force Monitoring' addition
Criteria 5	Addition of KPIs
Criteria 7	Board reaffirmation of zero tolerance



**Whiddon**