

MODERN SLAVERY STATEMENT

DECEMBER 2023

Whiddon

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DOCUMENT CONTROL

Document Review

| Version | Authorisation | Approval Date | Effective Date |
|---------|---------------|---------------|----------------|
| 1.2 | FWMH Board | 12/12/2023 | 12/12/2023 |
| 1.1 | FWMH Board | 13/12/2022 | 13/12/2022 |
| 1 | FWMH Board | 14/12/2021 | 14/12/2021 |

Summary of Changes

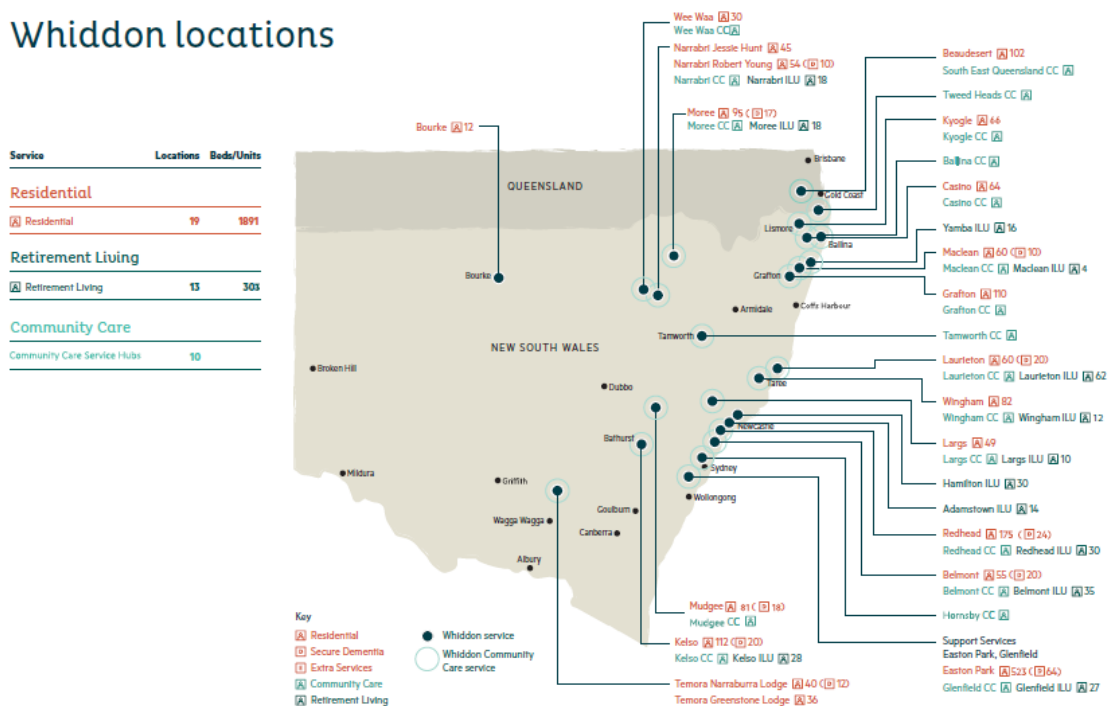
| Section | Update |
|------------|--|
| All | Whiddon Statistics updated to reflect FY23 and/or current position |
| Criteria 3 | Graphic changed to group applicable FY23 spend in to high risk modern slavery categories, as opposed to \$ spent across Whiddon internal spend categories. |
| Criteria 4 | Inclusion of action – new LMS implementation Inclusion of Ethical Investment Policy Change in frequency of Modern Slavery Committee meeting to bi-annual from quarterly. |

About Whiddon

Whiddon is an award-winning aged care 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 organization with more than 2600 customers and retirement villages that encompass regional, rural and remote areas of New South Wales and Queensland.

With our strong presence in the regional, rural and remote areas of New South Wales and Queensland we have over 2600 employees who pride themselves on delivering exceptional care standards. Being an aged care provider, we actively promote and pride ourselves on our sense of community. Wherever we may be, everyone matters.

Whiddon locations



Whiddon

Figure 1 – Whiddon Locations

Criteria 1 & 2 – Structure, Operations and Supply Chain

Structure

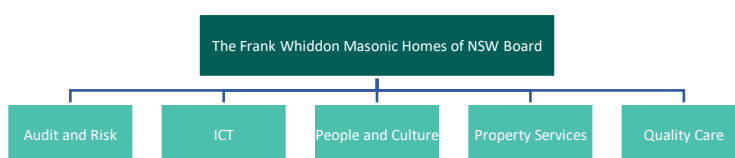
Whiddon (ABN: 49 082 395 091) is a public company limited by guarantee and registered with the Australian Charities and Not-For-Profit Commission (ACNC). Modern Slavery reporting and non-compliances will be incorporated into Whiddon’s risk assessment framework, as well as our risk management systems. Whiddon operates within Australian borders only, focusing on rural, regional & remote areas located in NSW and QLD.

The roles and responsibilities of the Whiddon Board are set out in the Board Charter. Our Board oversee and are accountable for our Modern Slavery Risk Management Program and approve our annual Statement. Certain responsibilities have been delegated by the Board to the Executive Team.

Modern slavery risk management initiatives implemented across our supply chain, will be administered via periodic 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, as well as ensuring our Employee Code of Conduct is revised and updated to reflect current labour rights, modern slavery and broader human rights and responsibilities.

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 staff are treated with the highest levels of dignity and respect. We consider the risk of Modern Slavery to be low within our direct business operations, while also acknowledging that the risk of Modern Slavery is higher within our supply chain, where visibility of our suppliers and tiers of our supply chain are limited.

Board Committee Structure



Organisation Structure



Figure 2. Whiddon Governance Structure

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 New South Wales and Queensland.

Our strong presence in the regional, rural and remote areas of New South Wales and Queensland sets us at the heart of local communities, both as an employer and aged care provider. As an aged care provider, we pride ourselves not only on delivering exceptional care standards, but also actively promote and pride ourselves on our sense of community. Wherever we may be, everyone matters.

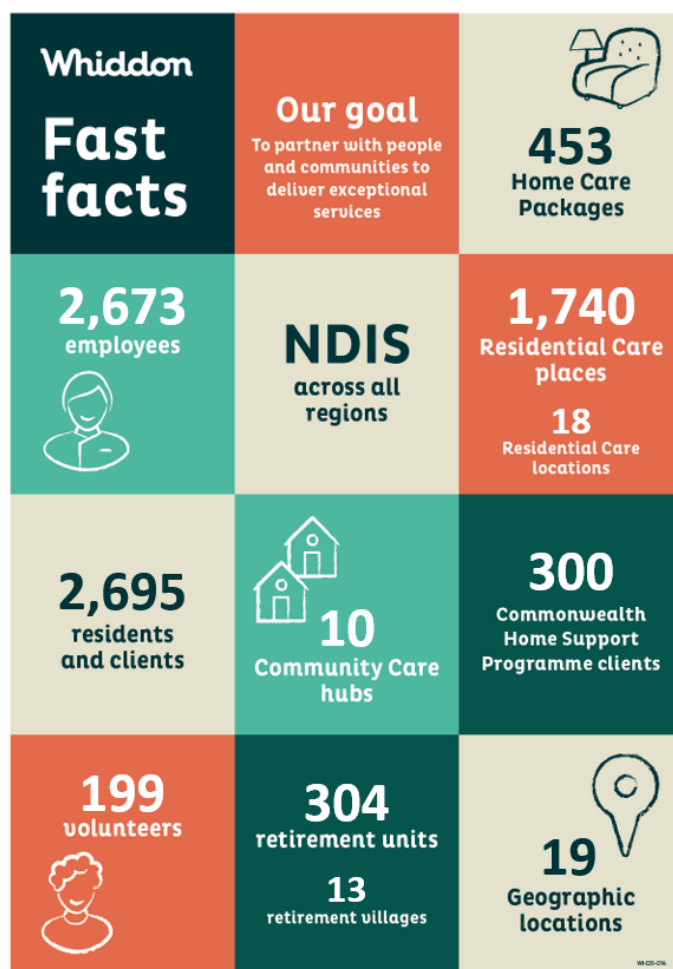


Figure 3 – Whiddon facts Nov-23

Supply Chain

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.

Criteria 3 – Modern Slavery Risks

Operations

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 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 greater in our supply chain where visibility of our suppliers and tiers of our supply chain is limited.

Whiddon is committed to ensuring it addresses and mitigates any risk to modern slavery within all channels of our business.

Supply Chain

Whiddon engages more than 2,000 suppliers and contractors across NSW and QLD with total annual operational and capital spend in excess of \$90 million.

In FY23, 23% 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 over ninety-five (95%) of our goods and services are sourced from known suppliers in countries where modern slavery risks are generally lower.

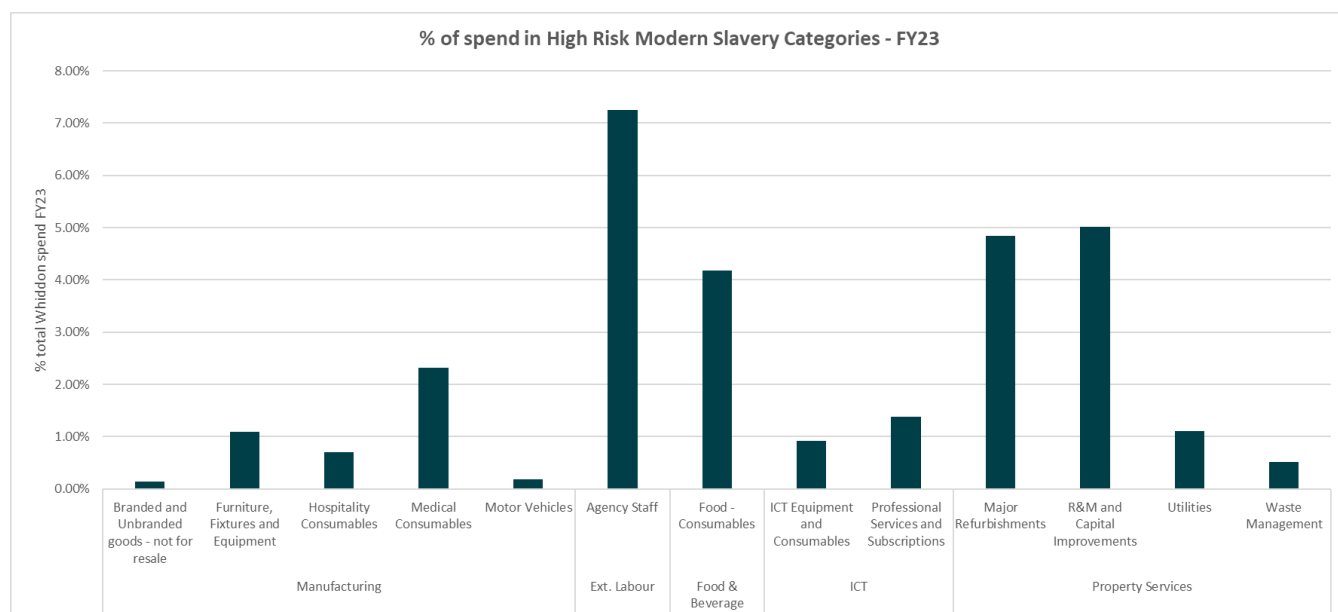


Figure 4. % Whiddon Spend by high risk modern slavery category

Criteria 4 – Mitigating Actions

In 2023 Whiddon continued to build upon the already solid framework implemented to manage the identified risks with compliance of the Modern Slavery Act. Along with maintaining initiatives outlined in our 2020 – 2022 statements, we have further developed our strategy to include the following:

Additional eLearning modules and Mandatory Training

Two (2) Modern Slavery online learning modules have been designed for completion by all staff 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. A new LMS (Learning Management System) was implemented in 2023, which will further assist in enhancing the mode and timeliness of delivery, as well as reporting functionality to monitor completion rates. It is intended that these modules will be included in the mandatory training plan for relevant Whiddon staff by December 2024.

Integration of Modern Slavery into the Whiddon Enterprise Risk Framework

Modern Slavery has been integrated into Whiddon's governance structure. Our Enterprise Risk Framework has incorporated the requirements of the legislation.

Service and Supply Agreements

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. Our top 10 suppliers by spend 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.

Modern Slavery Committee

Whiddon formed a Modern Slavery committee, which is comprised of members of Whiddon's leadership team. This committee is focussed on formulating the Modern Slavery action plan and implementing agreed actions. The intention is that this committee meets twice per annum.

Criteria 5 – Assessment

A review process has been implemented to ensure we are successfully meeting obligations within our Modern Slavery Action Plan and three-year Road Map which manages Whiddon’s Modern Slavery Risk.

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 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.

Criteria 6 – Controlled Entities

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

- Frank Whiddon Nominees Pty Ltd – ABN: 50 001 332 332
- The Frank Whiddon Masonic Homes Foundation Ltd – ABN: 80 001 753 742

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 12th December 2023.

Signed – Chair of the Board of Directors:

A handwritten signature in cursive script, reading "L. Kearns", written in black ink on a white background. The signature is positioned above a thin horizontal line.

Leonard Kearns
Director