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day hospitals group

Modern Slavery Statement

Cura Day Hospitals Group Pty Ltd

Reporting period: 1 January 2024 to 30 June 2025



Modern Slavery Statement

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1. Overview

This Modern Slavery Statement covers the activities of Cura Day Hospitals Group Pty Ltd ACN 125 245 409 and its owned and controlled entities during the reporting period 1 January 2024 to 30 June 2025.

References in this statement to 'Cura', 'we', 'our' and 'us' are references to the Cura Day Hospitals Group. Cura is an affiliate of Theia Holdco Pty Ltd ACN 673 254 156 following its acquisition of Cura on 30 April 2024. Prior to this acquisition, Cura was an affiliate of ACN 615 724 000 Pty Limited (formerly, Fresenius Medical Care Day Hospital Holdings Pty Ltd).

2. About us

- 2.1 At Cura, we strive to improve the lives of our patients through patient-centred health care services. Our long-term success depends on individuals conducting business with honesty, integrity and respect for human rights and the interests of our staff, health consumers, and investors as well as other stakeholders. We recognise that addressing modern slavery risks is a business-critical matter, as not only is it the right thing to do, but it will also improve the integrity and quality of business operations and supply chains.
- 2.2 We are committed to taking appropriate measures to identify and prevent modern slavery and human trafficking risks from occurring within both our business operations and supply chain. We require numerous materials, components, and services, which we procure from over 500 external suppliers in Australia.
- 2.3 As part of the ICG global organisation, Cura is committed to ensuring compliance with the highly regulated industry in which it operates which is subject to a number of complex laws, rules and regulations. We can therefore only meet our expectations, as well as societal and health consumer expectations, when our suppliers also adhere to social standards and play their part in adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place within their onward supply chains.
- 2.4 We continuously work to provide hospital facilities of the highest quality to ensure excellent outcomes for our health consumers and work to provide and promote a culture of safety and wellbeing for our staff, patients and other parties. Cura works alongside ICG, as the majority shareholder of the Cura business, to ensure compliance with the laws of Australia and, where appropriate, international laws as they pertain to our organisation.
- 2.5 Our focus is on serving health consumers. This shapes how we integrate sustainability into our business and tackle global health care challenges. Our commitment to sustainability is incorporated in our vision and our mission. It is also reflected in our strategy to deliver sustainable solutions with innovative products and services of the highest quality at a reliable cost. Managing sustainability successfully means creating lasting economical, ecological, and social value. For us, it also means driving the integration of sustainability into our business. As a health care company, we understand the responsibilities that come with managing a complex supply chain. Our responsible procurement principles reflect our commitment to promoting sustainable business practices in our daily operations. We expect our suppliers to share our commitment to sustainability and demonstrate sustainable business practices across their supply chains. Our Supplier Code of Conduct expects our suppliers to take best efforts to minimise the adverse impacts of their activities on the environment and to control any significant environmental risks. Cura also has an Environmental Policy in place.

3. Reporting entity

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Cura, Ground Floor, Boundary Court, 55 Little Edward Street, Spring Hill QLD 4000. This statement also covers the following Cura related entities:

- Adelaide Day Surgery Pty Ltd;
- Ballarat Day Procedure Centre Pty Ltd;
- Brindabella Endoscopy Centre Pty Ltd;
- Canberra Endoscopy Pty Ltd trading as Chesterville Day Hospital;
- Cura Day Hospitals (Operations) Pty Ltd;
- Cura Day Hospitals (Properties) Pty Ltd;
- Cura Newco 1 Pty Ltd trading as Victoria Parade Surgery Centre;
- Cura Newco 2 Pty Ltd trading as Kawana Private Hospital;
- Cura Newco 3 Pty Ltd trading as Eye Tech Day Surgeries;
- Cura Newco 4 Pty Ltd trading as Chermside Day Hospital;
- Cura Newco 5 Pty Ltd trading as Riverina Day Surgery;
- Cura Newco 6 Pty Ltd trading as Glen Iris Private;
- Cura Newco 7 Pty Ltd ATF Canberra Day Surgery Unit Trust trading as ACT Endoscopy;
- Cura Newco 8 Pty Ltd trading as Barton Private Hospital;
- Cura Newco 9 Pty Ltd trading as Sir John Monash Private Hospital;
- Cura Newco 10 Pty Ltd trading as Sydney Surgical Centre;
- Cura Newco 11 Pty Ltd;
- Day Surgery Management Group Pty Ltd trading as Glenelg Day Surgery;
- Dee Why Endoscopy Pty Ltd;
- Ipswich Day Surgery Pty Ltd;
- Lacular Pty Ltd trading as Liverpool Eye Surgery;
- Newcastle Endoscopy Centre Pty Ltd;
- Perth Eye Centre Pty Ltd trading as Perth Eye Hospital;
- Queensland Eye Hospital Pty Ltd trading as Brisbane Day Surgery;
- Somerset Private Hospital Pty Ltd;
- Subiaco Private Hospital Pty Ltd;
- Sunshine Coast Day Surgery Pty Ltd;
- Sydney Day Surgery Prince Alfred Pty Ltd;
- The Eye Hospital Pty Ltd;
- Toowoomba Surgicentre Pty Ltd;
- West Leederville Private Hospital Pty Ltd;
- Wagga Endoscopy Centre Pty Ltd;
- Captia Surgery Management Pty Ltd; and
- Day Surgery Management Pty Ltd,

(Existing Related Entities).

The following entities were acquired by Cura during the reporting period and have adopted Cura's policies and procedures referenced in this Modern Slavery Statement from acquisition:

- PresMed Holdings Pty Ltd;
- PresMed Midco Pty Ltd;
- PresMed Bidco Pty Ltd;
- PresMed Australia Pty Ltd;
- Canberra Microsurgery Pty Ltd;
- Canberra Eye Hospital Pty Ltd;
- Central Coast Surgery Centre Pty Ltd trading as Central Coast Day Hospital;
- Central Coast Day Hospital Tuggerah Pty Ltd;
- Chatswood Private Hospital Pty Ltd;
- Devonport Eye Hospital (NWC) Pty Ltd trading as Devonport Eye Hospital;
- Epping Surgery Centre Pty Ltd;
- Hereward Pty Ltd trading as Metwest Surgical;
- Kingham Ptd Ltd trading as Metwest Eye Centre;
- Madison Day Surgery Pty Ltd; and
- Sydney Surgery Centre Pty Ltd as Trustee for the Presmed Unit Trust trading as Chatswood Private Hospital,
- Clearvis Pty Ltd (20% Minority Interest)
- Southwestern Eye Care Pty Ltd (10% Minority Interest)
- Southwestern Ophthalmology Practice Pty Ltd (10% Minority Interest)
- Seaford Day Surgery (Tier 1A) Pty Ltd
- Seaford Day Surgery (Tier 1B) Pty Ltd
- Seaford Day Surgery (Tier 2) Pty Ltd
- Seaford Day Surgery Pty Ltd

(Acquired Entities).

4. Cura's organisational structure and operations

4.1 Cura's organisational structure

Cura is the leading provider of private hospital facilities in Australia, specialising in the day procedure sector.

Cura has three subsidiaries, Cura Day Hospitals (**Operations**) Pty Ltd (**Cura Operations**), Cura Day Hospitals (Properties) Pty Ltd (**Cura Properties**) and PresMed Holdings Pty Ltd (**PresMed Holdings**). Each of the entities covered by this statement are owned by Cura Operations and PresMed Holdings. Cura Operations, Cura Properties, PresMed Holdings and each of the entities covered by this statement have the same management personnel and board members. Therefore, Cura's structure and organisation is such that all entities are subject to the policies and procedures set by Cura, including modern slavery policies and procedures.

During the reporting period, Cura had 37 hospital facilities across Australia, providing high quality patient-centred care across a variety of specialty areas including Ophthalmology, Gastroenterology, Oral-Maxillofacial, Plastic & Reconstructive, Orthopaedic, Obstetrics, Gynaecology & IVF, Urology, and Ear, Nose & Throat. Cura's reporting entities trade as the following hospital facilities:

- ACT Endoscopy;
- Adelaide Day Surgery;
- Ballarat Day Procedure Centre;
- Barton Private Hospital;
- Brindabella Endoscopy Centre;
- Brisbane Day Surgery;
- Canberra Microsurgery;
- Central Coast Day Hospital;
- Chatswood Private Hospital;
- Chermerside Day Hospital;
- Chesterville Day Hospital;
- Dee Why Endoscopy Unit;
- Devonport Eye Hospital;
- Epping Surgery Centre;
- Eye-Tech Day Surgeries Spring Hill;
- Eye-Tech Day Surgeries Southside;
- Glen Iris Private;
- Glenelg Day Surgery;
- Ipswich Day Hospital;
- Kawana Private Hospital;
- Liverpool Eye Surgery;
- Madison Day Surgery;
- Metwest Surgical;
- Newcastle Endoscopy Centre;
- Perth Eye Hospital;
- Riverina Day Surgery;
- Seaford Day Surgery;

- Sir John Monash Private Hospital;
- Somerset Private Hospital;
- Subiaco Private Hospital;
- Sunshine Coast Day Surgery;
- Sydney Day Surgery - Prince Alfred;
- Sydney Surgical Centre;
- The Eye Hospital;
- Toowoomba Surgicentre;
- Victoria Parade Surgery Centre; and
- West Leederville Private Hospital.

4.2 Cura's operations

To support its hospital operations, Cura engages over 2,200 staff, comprising an employed and contracted workforce, and the supply chain of over 500 suppliers in Australia in the healthcare industry (prostheses, consumables, medical equipment and building maintenance) as well as services to support our facilities (cleaning, laundry, IT support, uniforms, building & construction).

4.3 Cura's modern slavery governance

- 4.3.1 Cura's modern slavery compliance is governed by its Modern Slavery Policy. The Cura Board is responsible for overseeing performance and operations of Cura, and the Board is assisted by the Executive Management Committee in discharging its responsibilities in relation to Cura's modern slavery obligations. Primary responsibility for anti-slavery initiatives sits with the Executive Management Committee.
- 4.3.2 Cura is fully committed to the highest quality of our services and integrity in dealing with our stakeholders. Cura has established frameworks and policies to identify risks and is continuously monitoring their effectiveness and appropriate management, consisting of the following guidance documents:
- Modern Slavery Policy;
 - Supplier Code of Conduct;
 - Human Rights Policy; and
 - Whistleblower Protection Policy.
- 4.3.3 Cura does not tolerate nor agree to any form of modern slavery, including but not limited to, trafficking in persons, slavery, servitude, forced marriage, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

5. Assessing modern slavery risk

5.1 Risks of modern slavery practices in Cura's operations and supply chain

5.1.1 The areas of Cura's operations where modern slavery risks may arise include:

- the procurement of medical goods including PPE, uniforms and surgical instruments;
- operating activities including building and facility services, support services and asset management; and
- frontline care including staff working conditions and interface with potential victims of modern slavery.

5.1.2 The greatest risk of modern slavery within the Cura business is in relation to third-party suppliers in its procurement and operating activities. In particular, there are risks in multi-tiered supply chains, which may cross into high-risk sectors and geographies. This is because of the low visibility that Cura has over its indirect suppliers.

5.1.3 In contrast, the risks with frontline care workers are minimised by directly employing most of its staff itself or through its subsidiaries.

5.1.4 Cura recognises that collaborating with all its suppliers and stakeholders can contribute towards the eradication of any form of modern slavery, mainly by maintaining close and ongoing dialogue with its internal stakeholders, business stakeholders, suppliers, and health consumers.

5.1.5 Cura assesses and addresses these risks through the actions outlined below.

5.2 How Cura assesses risks:

5.2.1 Cura Management and Board

During the reporting period, the Cura Board and Management discussed modern slavery risks at Board and Executive meetings. This ensured the Cura leadership was aware of modern slavery, and considering the risks and actions in Cura's operations and management.

5.2.2 Modern Slavery Questionnaire

Cura has historically required new and critical suppliers to complete a Modern Slavery Questionnaire, to improve transparency between Cura and its suppliers, assess the supplier's policies and identify possible modern slavery risks within their procurement process. However, during the reporting period, Cura identified that the questionnaire was not fit for purpose in Cura's operations, because suppliers found it difficult to complete the level of detail required. This led to administrative difficulties in ensuring suppliers completed and returned the questionnaire in a timely manner, with the information required for Cura to assess the modern slavery risks. This impacted the effectiveness of the Modern Slavery Questionnaire as a tool to assist Cura in assessing and providing meaningful focus on suppliers where there is greatest risk. As a result of this, Cura did not implement the Modern Slavery Questionnaire during the reporting period. However, all major and critical suppliers were onboarded prior to 1 January 2024. No critical suppliers were onboarded during the reporting period. It follows that while Cura did not implement this risk assessment tool during the reporting period, this did not materially impact Cura's ability to assess its modern slavery risks as its major suppliers had completed this assessment prior to this reporting period.

In future reporting periods, Cura intends to formulate a new Modern Slavery Questionnaire that is fit for purpose for its operations, and allows Cura to effectively assess and address modern slavery risks in its supply chains.

5.2.3 Onboarding and Modern Slavery Risk Assessment Procedure

Although Cura did not issue questionnaires, before it enters a contractual arrangement with a prospective supplier, Cura undertakes a supplier onboarding and due diligence process in accordance with the Cura Modern Slavery Policy. This involves Cura undertaking a desktop analysis of its supplier and the products that it supplies, and assessing the modern slavery risk in its supply chain. If a supplier were to be identified as high risk, and the contract is high value, Cura's policy is that it would not onboard that supplier. The suppliers that Cura engages are consistent across the reporting entities.

5.2.4 Supplier Code of Conduct

Cura has established a Cura Supplier Code of Conduct, which helps to maintain high ethical standards throughout the supply chain. Under the Cura Supplier Code of Conduct, suppliers are required to:

- proactively self-assess compliance with the *Modern Slavery Act 2018* (Cth);
- take all reasonable steps to ensure that its business and the businesses in its supply chains are not benefitting from, engaged in or complicit with human rights exploitations; and
- report any breaches of the Code of Conduct to Cura.

All of Cura's suppliers have received and acknowledged the Cura Supplier Code of Conduct. No disclosures were made during the reporting period.

5.2.5 Modern Slavery Policy

Cura has established a Cura Modern Slavery Policy, which helps to maintain high ethical standards throughout the supply chain. The Cura Modern Slavery Policy applies to Cura staff, related entities and suppliers. Under this policy, Cura:

- adopts a risk-based due-diligence assessment when engaging suppliers;
- undertakes supplier audits via desktop audits;

- requires staff members to report suspected modern slavery, by reporting to the Operations Manager, for consideration and action by Cura's Executive Management Committee for appropriate action.

5.2.6 **Modern slavery awareness training**

At Cura, we believe that an organisation is built on what staff achieve individually and as a team, and communication and training is an important step to ensure staff are aware of the current modern slavery requirements and any new requirements that may be introduced.

During the reporting period, Cura did not undertake formal training. In future reporting periods, Cura will undertake annual modern slavery awareness training (recorded) and additional training where any legislative changes or emerging issues in the modern slavery space arise. In particular, Cura will deliver training to ensure that staff can recognise the signs of modern slavery in Cura's operations and supply chains.

5.2.7 **Contractual controls**

Supplier contracts are reviewed by the relevant business team e.g. Procurement and the Legal team.

Cura includes a modern slavery clause in all its contracts. In relation to suppliers for procurement related contracts, a clause is included requiring compliance with the Cura Supplier Code of Conduct. The clause in Cura's contracts requires each supplier to:

- confirm that:
 - it has not been convicted of a modern slavery offence, has not engaged in modern slavery, is not under investigation for a modern slavery offence, or aware of any potential modern slavery in its operations or supply chain;
 - to the best of its knowledge, its affiliates have not been convicted of a modern slavery offence, have not engaged in modern slavery, are not under investigation for a modern slavery offence, or aware of any potential modern slavery in its operations or supply chain;
- comply with Cura Supplier Code of Conduct;
- take all reasonable and lawful actions to address modern slavery;
- take reasonable steps to identify the risk of, and reduce or prevent the occurrence of, modern slavery within its operations or supply chains;
- notify Cura if there is a modern slavery issue in its organisation or supply chain; and
- cooperate with Cura in addressing any potential modern slavery issues.

During this reporting period, there were no notifications made by suppliers of suspected or actual incidences of modern slavery.

6. Actions Taken

6.1 Staff access to key policies and procedures

In addition to the risk assessment process, Cura has policies on the Cura intranet (accessible to all staff), which include the Cura:

- Code of Conduct;
- Modern Slavery Policy;
- Human Rights Policy;
- Supplier Code of Conduct; and
- Whistleblower Protection Policy.

6.2 Engagement with suppliers

- 6.2.1 If a supplier cannot be assessed in accordance with the Cura Modern Slavery Policy, or where they are assessed as high risk, Cura may decide not to engage the supplier.
- 6.2.2 Cura will regularly liaise with suppliers regarding modern slavery compliance, where the onboarding process has highlighted any risks (other than high-risk in accordance with 6.2.1) within the supplier's supply chain.
- 6.3.3 During the reporting period, Cura periodically reviewed media and online sources/websites related to modern slavery to identify any high-risk items or regions that impact Cura's operations. As noted above, Cura largely contracts with Australian companies. This reduces the modern slavery risk, as the 2023 Global Slavery Index indicates that Australia has the lowest vulnerability to modern slavery in the Asia Pacific region. Despite this, Cura is aware that some of the goods it procures are vulnerable to modern slavery. For example, in 2022, Cura became aware that one of its disposable glove suppliers was being investigated for modern slavery, including debt bondage and forced labour. In response, Cura temporarily ceased its procurement from that supplier, and requested a statement from the company confirming its compliance with its modern slavery obligations after the matter was resolved. Cura remains vigilant to the risk of modern slavery in the procurement of disposable gloves as a result of that modern slavery issue. In the reporting period, there were no identified modern slavery risks in Cura's supply chains through this process.
- 6.3.4 In future reporting periods, Cura will continue to undertake desktop audits of suppliers, including:
- identifying any negative media regarding a supplier or its supply chain;
 - identifying and monitoring any high-risk items it procures;
 - checking court databases for current or impending legal action;
 - checking sanctions or watchlists; and
 - checking other relevant public records available.

7. Assessment of effectiveness

7.1 Cura understands the importance of assessing the effectiveness of the actions to assess and address modern slavery risks to comply with the *Modern Slavery Act 2018*. We set out below actions/activities we will undertake over the next 12 months to enhance our modern slavery processes and the effectiveness of our risk mitigation processes.

7.2 Cura will:

- review and update its Modern Slavery Questionnaire to be fit for purpose;
- review and update procurement process and policies as needed;
- review and update the Modern Slavery Policy and related documents as needed;
- provide staff training to ensure all staff can assess modern slavery in their work; and
- through its desktop audits, develop a policy to respond to potential non-compliance to Cura's modern slavery requirements and work with key suppliers to overcome these.

8. Consultation

8.1 This statement was prepared and reviewed by members of the executive management team of Cura, including the Chief Financial Officer of Cura. The Cura group of companies, including the entities that Cura owns and controls, have a common management structure and consultation in the preparation and review of this statement has occurred through their common management and reporting channels.

8.2 This statement was approved by the Board of Cura Day Hospitals Group in their capacity as the principal governing body of Cura on 15 December 2025.

9. Sign-off

This statement is signed by Peter Freeleagus and Annette Abrahams as Directors of Cura Day Hospitals Group Pty Ltd ACN 125 245 409.



Peter Freeleagus

Annette Abrahams

Director, Cura Day Hospitals Group Pty Ltd
ACN 125 245 409

Director, Cura Day Hospitals Group Pty Ltd
ACN 125 245 409

Date: 18/12/2025

Date: 18/12/2025