



Cura Day Hospitals Group Pty Ltd Statement is submitted in accordance with the requirements of the Modern Slavery Act 2018 (Cth).



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## Introduction

At Cura Day Hospitals Group Pty Ltd (Cura), an affiliate of Fresenius Medical Care, we strive to improve the lives of our patients through superior services and products. Our long term success depends on every individual conducting business with honesty, integrity and respect for human rights and the interests of our employees, customers, and investors as well as other stakeholders. We recognize that addressing modern slavery risks is a business-critical matter, as not only is it the right thing to do, it will also improve the integrity and quality of business operations and supply chains.

We are committed to preventing acts of modern slavery and human trafficking from occurring within both our business and supply chain. We require numerous materials, components and services, which we procure from over 500 external suppliers in Australia.

As part of the Fresenius Medical Care Group 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 customer 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.

We continuously work to provide hospital facilities of the highest quality to ensure excellent outcomes for our patients, and also work to provide and promote a culture of safety and wellbeing for our employees, patients and other parties. Cura works alongside our parent organization, Fresenius Medical Care, to ensure compliance with the laws of Australia and where appropriate international laws as they pertain to our organization.

This second statement sets out the steps taken by Cura during its financial year ending 31 December 2021 to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its business.

# A. Reporting entity

This statement is for our financial year ending 31 December 2021 and has been approved by the Board of Directors on 20<sup>th</sup> June 2022 for Cura Day Hospitals Group Pty, Ltd, ABN 49 125 245 409, Ground Floor, Boundary Court, 55 Little Edward Street, Spring Hill QLD 4000.

This statement also covers other Cura entities which include:

- 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 Group 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
- Dee Why Endoscopy Pty Ltd
- Ipswich Day Surgery Pty Ltd trading as Ipswich Day Hospital
- 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
- 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
- Wagga Endoscopy Centre Pty Ltd
- West Leederville Private Hospital Pty Ltd

## B. Structure and supply chain

Cura is the leading provider of private hospital facilities in Australia, specialising in the day procedure sector. Cura has 26 hospital facilities around Australia, providing high quality, patient-centred care in many specialty areas including Ophthalmology, Gastroenterology, Oral-Maxillofacial, Plastic & Reconstructive, Orthopaedic, Obstetrics, Gynaecology & IVF, Urology, and Ear, Nose & Throat. The following hospital facilities are part of Cura:

- Adelaide Day Surgery
- ACT Endoscopy
- Ballarat Day Procedure Centre
- Barton Private Hospital
- Brindabella Endoscopy Centre
- Chermside Day Hospital
- Chesterville Day Hospital
- Dee Why Endoscopy Unit
- Eye Tech Day Surgeries Spring Hill
- Eye Tech Day Surgeries Southside
- Glen Iris Private
- Ipswich Day Hospital
- Kawana Private Hospital
- Liverpool Eye Surgery
- Newcastle Endoscopy Centre
- Perth Eye Hospital
- Queensland Eye Hospital
- Riverina Day Surgery
- Somerset Private Hospital
- Subiaco Private Hospital
- Sunshine Coast Day Surgery
- Sydney Day Surgery Prince Alfred
- The Eye Hospital
- Toowoomba Surgicentre
- Victoria Parade Surgery Centre
- West Leederville Private Hospital

To support its hospital operations, Cura engages over 1,500 staff, comprising an employed and contracted workforce, and the supply chain consists of over 500 suppliers 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 etc).

## C. Risks of Modern Slavery

Cura is establishing the adequate frameworks to identify material risks and ensure they are monitored and adequately managed. Nevertheless, foundational processes are continuously being developed and applied to identify risks within geographic, industry, product and service areas of Cura's operations and supply chain.

Cura has not identified any specific instances of modern slavery. However, it has identified the following as potential risk areas within its supply chain where the perception of or potential for risk factors of modern slavery may be present.

Operations provider to support hospital operation:

Contracted workforce

Service providers to support hospital facilities:

Cleaning, laundry, IT support, uniforms, building & construction.

Cura recognizes that collaborating with all its stakeholders can contribute towards the eradication of any form of modern slavery, mainly by maintaining close and ongoing dialogue with its business partners, suppliers and customers.

# D. Actions taken to Assess and Address the Risk of Modern Slavery

In 2021, Cura established a Global Supplier Code of Conduct which helps to maintain high ethical standards throughout the supply chain. We require our business partners to comply with our compliance brochure dedicated to business partners and the Global Supplier Code of Conduct. Further to that, a modern slavery consultation group that consists of its key management teams - Compliance, Legal, Finance and Procurement to raise awareness of the issues of modern slavery and to execute a plan to assess modern slavery risks in our business and supply chain has also been established.

#### Governance

Our Global compliance program comprises the Code of Ethics and Business Conduct which covers topics that are relevant for our business such as our commitment to respect material human rights with regard to topics such as working conditions, non-discrimination and grievance mechanisms. 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.

We at Cura are fully committed to the highest quality of our services, integrity in dealing with our partners, responsible conduct, and reliability. That is what we stand for. That is what is important to us. We have built a framework to ensure this, and they consist of the following guidance documents:

- Cura Code of Ethics and Business Conduct
- Global Supplier Code of Conduct
- Our Compliance Management System
- Reports on Potential Compliance cases

At Cura, we acknowledge that assessing and addressing modern slavery risks is an ongoing process and we are continuously looking for opportunities to assess the risks and measures to consider in this regard. The key stakeholders, together with all employees, have a responsibility to ensure compliance with legal and regulatory requirements for the local business.

#### **Risk Assessment and Modern Slavery Questionnaire**

At Cura, the Due Diligence for all Third Parties is done via the Third Party Management Tool "OnBoard". This is the starting point of the Third Party Compliance Lifecycle. The result of the onboarding process defines risk-based mitigation measures and the subsequent monitoring and control activities throughout the whole Third Party Compliance Lifecycle.

In 2022, Cura will perform a dedicated supplier risk assessment. The scope of suppliers will be refined by the following:

- (i) Cost of Goods procured
- (ii) Geographical location
- (iii) Global Slavery Index (targeting on G20 countries as they rank amongst the largest importers and exporters)

In addition, a detailed questionnaire has been drafted for critical suppliers. The findings from this questionnaire, together with the quantitative assessment mentioned above, will contribute to determine our risks level and further action with critical suppliers.

This risk assessment methodology will aim for a meaningful focus on those suppliers where the greatest risk for human trafficking and slavery may be present. To further enhance and refine the approach, and to provide insight into our supplier practices and potential risks a supplier questionnaire has been developed. This will be issued to our key suppliers identified through our risk assessment. The aim is to improve transparency between Cura and its suppliers, assess the supplier's policies and identify possible modern slavery risks within their procurement.

#### **Increasing Awareness**

At Cura, we believe that an organization is built on what employees achieve individually, and communication and training is an important step to ensure employees are aware of the new requirements that may have been introduced. In 2021, we incorporated our requirements and expectations with regard to human rights to a greater extent in the mandatory training for employees on our Code of Ethics and Business Conducts. We will also include the topics in training programs for procurement personnel on our new Supplier Code of Conduct.

In 2022, we will include the topics on Global Supplier Code of Conduct for relevant employees. We will continue to evaluate on-going training requirements on an annual basis.

## E. Assessment of Effectiveness

Our approach to measuring the effectiveness of how we assess and manage modern slavery-related issues continues to evolve. At Cura, for instance, we review any report received via our channel for grievances platform <a href="Compliance Action">Compliance Action</a> <a href="Line">Line</a> which can be used by anyone within or outside the organisation. We are committed to communicating transparently regarding the risk of modern slavery in our operations and supply chain.

We take compliance with the Modern Slavery Act 2018 seriously, and do not tolerate slavery and human trafficking within our supply chains. If we were to find evidence that one of our suppliers was involved in modern slavery or human trafficking we would investigate those allegations, and consider terminating our relationship with them if the incidents were not resolved to our satisfaction.

# F. Sign-off

This statement was approved by the Board of Cura Day Hospitals Group Pty Ltd (Cura), an affiliate of Fresenius Medical Care on 20<sup>th</sup> June 2022.

Andrew Currie

Managing Director - Care Delivery

Date: 20<sup>th</sup> June 2022