

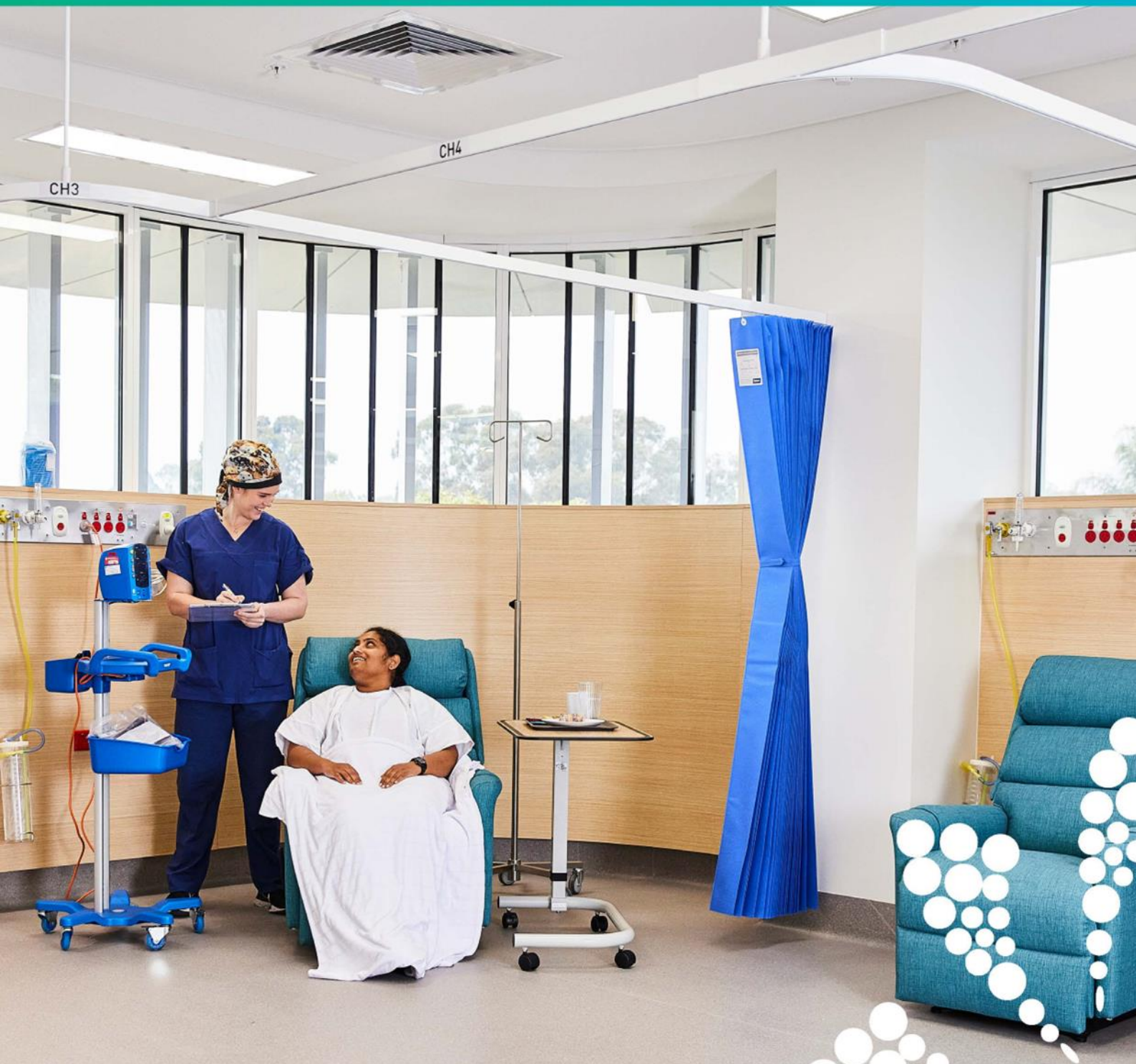


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day hospitals group

# Modern Slavery Statement

Cura Day Hospitals Group Pty Ltd

2023



# Modern Slavery Statement 2023

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# 1. Overview

This Modern Slavery Statement covers the activities of Cura Day Hospitals Group ACN 125 245 409 and its owned and controlled entities during the year ended 31 December 2023. References in this statement to 'Cura', 'we', 'our' and 'us' are references to the Cura Day Hospitals Group. Cura is 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 centered 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 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 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 our parent organisation, Fresenius Medical Care, 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 Global 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
- Day Surgery Management Group Pty Ltd trading as Glenelg Day Surgery
- 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 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

## 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 29 hospital facilities across Australia, providing high quality patient-centered care across a variety of specialty areas including Ophthalmology, Gastroenterology, Oral-Maxillofacial, Plastic & Reconstructive, Orthopedic, 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
- Glenelg Day Surgery
- Ipswich Day Hospital
- Kawana Private Hospital
- Liverpool Eye Surgery
- Newcastle Endoscopy Centre
- Perth Eye Hospital
- Brisbane Day Surgery
- Riverina 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
- West Leederville Private Hospital

## 4.2 Cura operations

To support its hospital operations, Cura engages over 1,800 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 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
- Onboarding and Modern Slavery Risk Assessment Policy
- 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 greatest risk of modern slavery within the Cura business is in relation to third-party suppliers (on the basis that the Cura can only control its own actions). Most of our staff are employed directly by Cura or Related Bodies Corporate – this lowers the risk of modern slavery within the Cura workforce.

5.1.2 Cura recognises 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 internal stakeholders, business stakeholders, suppliers, and health consumers.

## **5.2 How Cura assesses risks:**

### **5.2.1 Modern Slavery Questionnaire**

- (a) A questionnaire has been drafted for our business teams to complete in relation to new and/or critical suppliers. 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 process.
- (b) The findings from this questionnaire, together with the quantitative assessment and onboarding, will assist 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.

### **5.2.2 Onboarding and Modern Slavery Risk Assessment Procedure**

Before Cura enters a contractual arrangement with a prospective supplier, Cura undertakes a supplier onboarding and due diligence process in accordance with the Cura Onboarding and Modern Slavery Risk Assessment Policy.

### **5.2.3 Supplier Code of Conduct**

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

### **5.2.4 Modern Slavery Policy**

Cura has established a Cura Modern Slavery Policy, which helps to maintain high ethical standards throughout the supply chain.

### **5.2.5 Modern Slavery awareness training**

- (a) 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.
- (b) Cura's Legal team will undertake annual modern slavery awareness training (recorded) and additional training where any legislative changes or emerging issues in the modern slavery space arise.

### **5.2.6 Contractual Controls**

- (a) Supplier contracts are reviewed by the relevant business team e.g., Procurement and the Legal team.
- (b) Cura includes a Modern Slavery clause in all its contracts. In relation to suppliers for procurement related contracts, a clause requiring compliance with the Cura Supplier Code of Conduct is also included, or otherwise a warranty the prospective supplier will comply with the Supplier's Code of Conduct during the contract term.

## 6. Actions Taken

### 6.1 Staff access to key policies and procedures

In addition to the risk assessment process, Cura has prepared and published on the Cura intranet (accessible to all Staff) the Cura:

- Code of Conduct
- Modern Slavery Policy
- Human Rights Policy
- Supplier Code of Conduct
- Onboarding and Modern Slavery Risk Assessment Policy
- 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 and Onboarding and Modern Slavery Risk Assessment Policy, or where they are assessed as high risk, Cura will not 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 5.2.1) within the supplier's supply chain.
- 6.3.3 Through its Procurement team and Legal team, undertake desktop audits of suppliers, including identifying any negative media regarding a supplier or its supply chain; checking court databases for current or impending legal action; checking sanctions or watchlists; and such 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 procurement process and policies as needed.
  - Review and update the modern slavery policy and related documents as needed.
  - Provide additional staff training where there are legislative changes or emerging issues in modern slavery and human rights space.
  - 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 senior members of the management team of the Cura group of companies, including the Chief Executive Officer and 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 Pty Ltd in their capacity as the principal governing body of Cura on 17 January 2025.

## 9. Sign-off

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



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Annette Abrahams

Peter Freeleagus

Director, Cura Day Hospitals Group ACN 125 245 409

Director, Cura Day Hospitals Group ACN 125 245 409

Date: 17 January 2025

Date: 17 January 2025