



**FRESENIUS  
MEDICAL CARE**



# **Modern Slavery Statement**

**Cura Day Hospitals Group Pty Ltd**

Financial Year 2021/2022

**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 Day Hospital Holdings Pty Ltd, we strive to improve the lives of our patients through superior services and products. Our long-term success depends on individuals 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 recognise 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 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.

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 organisation, Fresenius Medical Care, to ensure compliance with the laws of Australia and, where appropriate, international laws as they pertain to our organisation.

Our focus is on serving patients. 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 global health care company, we understand the responsibilities that come with managing a complex supply chain. We have established policies and procedures that comply with applicable laws and regulations worldwide. 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.

This third Modern Slavery statement sets out the steps taken by Cura during its financial year ending 31 December 2022 to prevent slavery and human trafficking from taking place in any part of its business or its supply chains.

## A. Reporting entity

This statement is for our financial year ending 31 December 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
- 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
- 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
- Wagga Endoscopy Centre Pty Ltd
- West Leederville Private Hospital Pty Ltd

## B. Structure, operations and supply chain

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

29 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
- 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

To support its hospital operations, Cura engages over 1,700 staff, comprising an employed and contracted workforce, and the supply chain consists 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 etc).

## C. Risks of Modern Slavery

Cura has established the adequate frameworks to identify material risks and is continuously monitoring their effectiveness and appropriate management. Moreover, 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.



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 operations and supply chain has also been established. Cura has consulted the relevant companies under its control or ownership in the development of this Modern Slavery Statement.

### Governance

We at Cura are fully committed to the highest quality of our products and services, integrity in dealing with our partners, responsible conduct, and reliability. We have built a framework consisting of the following guidance documents:

- Cura Code of Ethics and Business Conduct
- Supplier Code of Conduct
- Our Compliance Brochure for Business Partners
- Reporting Potential Violations Policy
- Human Rights, Workplace Rights and Labour and Employment Principles
- Group Human Rights Statement

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.

Our Global Supplier Code of Conduct includes the following six key principles: (i) integrity and ethics; (ii) human rights and labour conditions; (iii) occupational health and safety; (iv) environment; (v) quality; (vi) governance and management systems.

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.

In 2022, FMC Group also developed a global strategic framework including global focus areas for our human rights activities, applicable to all FMC Group entities including FMC Australia. The global approach to Human Rights Due Diligence rests on 3 pillars: (1) identify risks; (2) raise awareness of human rights issues within relevant functions and in business relationships; (3) improve practices that incorporate human rights considerations in our business processes. has also approved the FMC Group Strategic Framework for Human Rights to enable us to fulfill our commitment to respect Human Rights. In the Global Legal Function there is a new Human Rights Office to monitor and support the implementation of our Human Rights Due Diligence. The risk ownership for potential risks is allocated to senior management representatives within our various operating divisions overseeing the entities in our group: Care Enablement, Care Delivery, Global Medical Office and the relevant functions.

### **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 addition, a detailed questionnaire has been drafted for our business teams to complete in relation to 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. 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.

## Increasing Awareness

At Cura, we believe that an organisation 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. In 2022, we provided training on topics such as the Global Supplier Code of Conduct for relevant employees. We will continue to evaluate on-going training requirements on an annual basis.

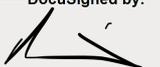
## E. Assessment of Effectiveness

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 Compliance Action Line 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 Directors of Cura Day Hospitals Group Pty Ltd (Cura), an affiliate of Fresenius Medical Care, on the        day of June 2023.

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**Andrew Currie**  
Director

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Director