

Cura Day Hospitals Group FY2020 Modern Slavery Statement

INTRODUCTION

Cura Day Hospitals Group Pty Ltd (Cura), a subsidiary of Fresenius Medical Care in Australia, is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its supply chain. This statement is made in compliance with the *Modern Slavery Act 2018* and sets out the steps taken by Cura during its financial year ending 31 December 2020 to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its business. 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 therefore expect the same high standards from our suppliers. This includes an expectation that they conduct their business in a lawful and ethical manner, which includes 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.

REPORTING ENTITY

This statement is for our financial year ending 31 December 2020 and has been approved by the Board of Directors on 30 June 2021 for Cura Day Hospitals Group Pty Ltd, ABN, Ground Floor, Boundary Court, 55 Little Edward Street, Spring Hill QLD 4000. This statement also covers other Cura entities which include:

- Cura Day Hospitals Group Pty Ltd
- Cura Day Hospitals (Operations) Pty Ltd
- Cura Newco 7 Pty Ltd atf Canberra Day Surgery Unit Trust trading as ACT Endoscopy
- 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 Newco 4 Pty Ltd trading as Chermide Day Hospital
- Dee Why Endoscopy Pty Ltd
- Cura Newco 3 Pty Ltd trading as Eye-Tech Day Surgeries
- Cura Newco 6 Pty Ltd trading as Glen Iris Private
- Ipswich Day Surgery Pty Ltd trading as Ipswich Day Hospital
- Cura Newco 2 Pty Ltd trading as Kawana Private 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
- Cura Newco 5 Pty Ltd trading as Riverina Day Surgery

- Sunshine Coast Day Surgery Pty Ltd
- Sydney Day Surgery Prince Alfred Pty Ltd
- Somerset Private Hospital Pty Ltd
- Subiaco Private Hospital Pty Ltd
- The Eye Hospital Pty Ltd
- Toowoomba Surgicentre Pty Ltd
- Cura Newco 1 Pty Ltd trading as Victoria Parade Surgery Centre
- Wagga Endoscopy Centre Pty Ltd
- West Leederville Private Hospital Pty Ltd

STRUCTURE AND SUPPLY CHAIN

Cura is the leading provider of private hospital facilities in Australia, specialising in the day procedure sector. Cura has 25 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:

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

To support its hospital operations, Cura engages over 1,150 staff, comprising an employed and contracted workforce, and its 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).

POLICIES

As part of the Fresenius Medical Care Group (Fresenius Medical Care Group AG & Co. KGaA as well as its direct and indirect subsidiary companies worldwide- hereinafter also “we”), Cura is required to comply with global, group-wide policies.

Cura’s parent organization, Fresenius Medical Care Group AG & Co. KGaA has adopted a global statement on Human Rights, Workplace Rights and Labor Rights and Employment Principles which confirms our commitment toward respecting human and labor rights, providing a respectful work environment and also the prohibition of modern slavery and human trafficking. A global policy specifying the company position on child labor and modern slavery is currently being developed within Fresenius Medical Care Group’s Global Human & Labor Rights Program.

We also have a number of policies promoting best practice and ethical conduct that demonstrates our commitment to promoting a safe, healthy and productive workplace for our employees and include respective expectations towards our business partners who assist us in our business operations. These include:

Code of Ethics and Business Conduct

Fresenius Medical Care Group’s Code of Ethics and Business Conduct applies globally to every officer, director, employee, contract worker and agent of the Fresenius Medical Care Group. Click [here](#) to access the Code of Ethics and Business Conduct.

This Code of Ethics and Business Conduct makes clear to employees the standards of conduct and behaviour expected of them when representing Cura and expects our employees to report any actual or suspected violation of the law, which includes the *Modern Slavery Act 2018*.

We are committed to investigate all alleged breaches of our Code of Ethics and Business Conduct and take appropriate disciplinary action, as required, if a breach is established.

Global Supplier Code of Conduct

The global Supplier Code of Conduct outlines our expectations of suppliers. Suppliers are encouraged and expected to establish adequate procedures within their organisations as well as their value-and supply-chains to comply with these requirements. Adherence to the Code is one important criterion in the supplier selection process. We aim to cooperate with suppliers on sustainability with the objective to increase transparency on the environmental and social impacts associated with our supply chains. Click [here](#) to access the Supplier Code of Conduct.

Compliance Action Line

Cura fosters an open working atmosphere and actively encourages its employees to question everything that does not comply with the laws, rules and regulations, and to report any indications of possible violations to their superiors or the Compliance, Legal or Human Resources departments. In addition, both Cura employees and external parties, including suppliers, can anonymously (to the extent permitted by law) report suspected unethical or inappropriate business practices of employees via a hotline – the Compliance Action Line – and via appropriate email addresses.

In accordance with Cura's policy, there must be no negative consequences for whistleblowers if they have made the report in good faith. Click [here](#) to access more information on the Compliance Action Line.

Conflict Minerals

We are committed to compliance with Section 1502 of the Dodd-Frank Act and encourage our suppliers to foster similar commitments of their supply chain related to conflict minerals disclosures. Suppliers who are non-compliant with our Conflict Minerals Policy are reviewed for continued business. Click [here](#) to access the Conflicts Minerals Policy.

RISKS OF MODERN SLAVERY PRACTICES AND ACTIONS TAKEN TO ADDRESS THE RISKS

In 2020, we initiated global risk assessments to evaluate sustainability risks both in our own operations as well as in our supply chain.

To regularly assess the company's actual and potential impact on human rights, we have developed a due diligence approach. Topics relating to human rights are integrated into our corporate risk management process and continuously monitored. In 2020, we initiated a global human and labor rights risk assessment. The methodology used is based on the requirements of the UN Guiding Principles on Business and Human Rights. Depending on the outcomes of this assessment, we are planning to derive further measures.

Various channels are available to employees, patients and other third parties, including suppliers, to report potential violations of laws and company policies. To enhance our grievance management approach, we started an analysis of our existing grievance mechanisms in 2020. For this, we used the effectiveness criteria of the UN Guiding Principles on Business and Human Rights.

We have intensified our communication on our commitments and activities relating to human rights.

Our aim here is to raise awareness among our employees. In 2020, for example, we held virtual awareness sessions to inform our leadership teams about our global Human Rights, Workplace Rights and Labor and Employment Principles. In 2021, we incorporated our requirements and expectations about human rights to a greater extent in the mandatory training for employees on our Code of Ethics and Business Conduct. We will also include the topics in training programs for procurement personnel on our new global Supplier Code of Conduct.

Furthermore, we are committed to integrating external perspectives in our human rights due diligence concept. In 2020, for example, we joined the Human Rights Working Group of Business for Social Responsibility, a global non-profit organisation with a network of more than 250 member companies and other partners.

In the context of our Global Sustainability Program, we launched an initiative to evaluate suppliers based on sustainability risks. This helps us to cluster our supplier base according to their sustainability risks, monitor them more closely and take corresponding action. Critical suppliers will be asked to provide information about their sustainability performance, for instance in the form of a self-assessment. We will use this to identify suppliers we want to work with to ensure compliance with our sustainability standards.

We have also started to monitor social media releases regarding our suppliers to expose potential issues. By the end of 2020, we had screened the social media presence of more than 20 % of our most important suppliers by relevant spend.

RISK AND OPPORTUNITY MANAGEMENT

At Fresenius Medical Care, an integrated management system is in place to ensure that risks and opportunities are already identified at an early stage, optimising the risk profile and minimising the costs potentially related to the occurrence of risks through timely intervention. Cura's risk management is therefore an important component of the corporate management of Fresenius Medical Care. The adequateness and effectiveness of the internal control systems of Fresenius Medical Care are reviewed on a regular basis by the Management Board and by Fresenius Medical Care's auditor.

The foundational work leading into our first reporting period provides a base where we can leverage the data collation, analysis and due diligence performed to date, and actions taken, to pave the way for enhanced monitoring and reporting. The bulk of our efforts and resources have focused on assessment of our suppliers, with further actions planned to enhance our approach to assessing suppliers including requesting our key suppliers to complete a Modern Slavery Supplier Questionnaire. Our approach to measuring the effectiveness of how we assess and manage modern slavery-related issues continues to evolve. 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.

Third parties and other stakeholders who approach us directly for information in relation to our Modern Slavery Statements outside of what is disclosed in this Modern Slavery Statement will be directed to the Associate Director, Compliance ANZ within Cura for further information.

SIGN-OFF

This statement is made in accordance with the *Modern Slavery Act 2018* and constitutes Cura Day Hospitals Group Pty Ltd's Modern Slavery statement for the financial year commencing 1 January 2020 and ending 31 December 2020.

Andrew Currie

Chief Executive Officer - Cura Day Hospitals Group Pty Ltd

Managing Director - Fresenius Kidney Care ANZ

Date:

MODERN SLAVERY ACT REQUIREMENT	FMC MODERN SLAVERY STATEMENT	PAGE
Identify the reporting entity	REPORTING ENTITY	1
Describe the structure, operations and supply chains of the reporting entity	STRUCTURE AND SUPPLY CHAIN	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	RISKS OF MODERN SLAVERY PRACTICES AND ACTIONS TAKEN TO ADDRESS THE RISKS	4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to address those risks, including due diligence and remediation processes	POLICIES	3
	RISKS OF MODERN SLAVERY PRACTICES AND ACTIONS TAKEN TO ADDRESS THE RISKS	4
Describe how the reporting entity assess the effectiveness of such actions Ongoing assessment of modern slavery risk	RISK AND OPPORTUNITY MANAGEMENT	5
Describe the process of consultation with any entities that the reporting entity owns or controls	REPORTING ENTITY	1
Provide any other information that the reporting entity or the entity giving the statement considers relevant	INTRODUCTION	1