



DIMEO GROUP HOLDINGS PTY LTD

# Modern Slavery Statement

*October 2021 26/10/2021 Board Approved*

For the Australian Commonwealth *Modern Slavery Act 2018* FY2020-2021 reporting period.



# Contents (Statement Annexure)



The following pages of Dimeo Group Holdings Pty Limited's Modern Slavery Statement address each of the mandatory criteria in section 16 of the Australian Commonwealth *Modern Slavery Act 2018*:

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# Principal Governing Body Approval Signature of Responsible Member The Reporting Entity



## PRINCIPAL GOVERNING BODY APPROVAL

On 26th October 2021, this Modern Slavery Statement for FY2020-2021 was approved by the Board, acting as the principal governing body of Dimeo Group Holdings Pty Limited, ACN 630 189 758, as defined by the *Modern Slavery Act (Cth)* ("the Act").

## SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement is signed by Mr. James Webber, Director, acting as a responsible member of Dimeo Group Holdings Pty Ltd, as defined by the Act:

**James Webber** – Director

**REPORTING ENTITY:** **Dimeo Group Holdings Pty Ltd**

**ACN:** **630 189 758**

Registered Address: On Gadigal Country, Unit 4, 37 O'Riordan Street, Alexandria, NSW 2015, AUSTRALIA.

Website: [www.dimeo.com.au](http://www.dimeo.com.au)

Dimeo Cleaning Services was established in 1980.

We are a privately-owned Australian cleaning company committed to providing the highest quality cleaning services across Australia.



# Dimeo's Approach



## DIMEO'S APPROACH

Dimeo Group Holdings Pty Ltd (Dimeo), is pleased to produce this Modern Slavery Statement for FY2020-2021, in accordance with the requirements of the Australian Commonwealth *Modern Slavery Act 2018*.

Dimeo is proud to continue to be a leader in responsible employment practices and operations in the Australian cleaning industry. Since our formation in 1980, we consistently demonstrate the highest employment standards, and advocate across the sector for positive change in fair and ethical arrangements for cleaning contracts. We take pride in enriching the lives of our employees by providing equitable recruitment, security of employment, fair remuneration, freedom of association and opportunity for career development in respectful and supportive team environments.

In the FY2020-2021 period, Dimeo adopted the Sustainable Development Goals (SDGs), aligning our policies, operations and reporting to this global framework.

Since January 2020, Australia has been dealing with the coronavirus (COVID-19) pandemic and Dimeo has worked hard to continue to uphold the highest employment standards for our employees and maintain transparent supply chain relationships.

We remain alert to the risk that COVID-19 can potentially increase the vulnerability of our employees and our supply chains' workers to Modern Slavery. Our approach to COVID-19 is discussed in more detail later in this Statement.

Notwithstanding Dimeo's efforts, we continue to acknowledge that the cleaning industry remains a sector that has the potential to pose significant Modern Slavery risks. We are committed to continuing to work with our employees, suppliers, clients and stakeholders to eliminate potential Modern Slavery risks in our operations, supply chains and the wider Australian cleaning industry.



# Dimeo's Approach

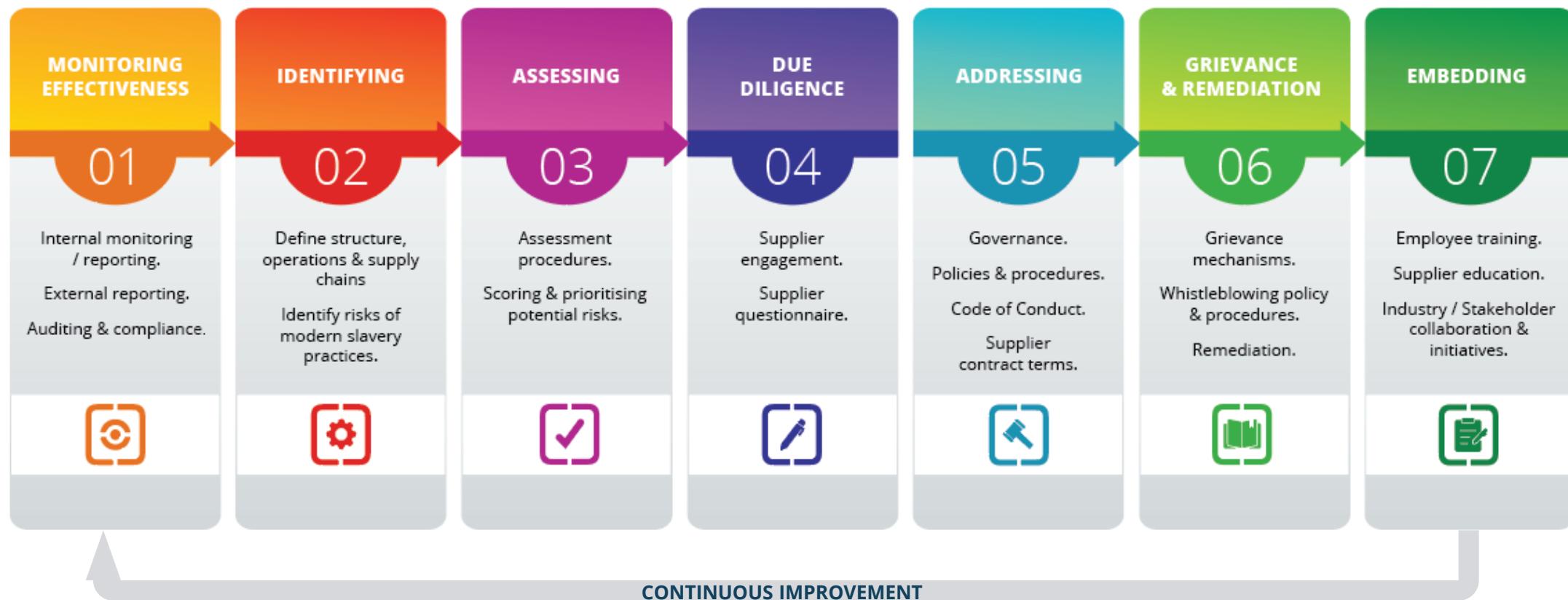


Dimeo continues to acknowledge our responsibility under the UN Guiding Principles on Business & Human Rights (UN Guiding Principles) to respect human rights in all our business activities. We acknowledge that this includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in our operations and supply chains.

Dimeo continues to implement our comprehensive and iterative approach to Modern Slavery risks in our operations and supply chains. In FY2019-2020 we called on the expertise of independent consultants to enhance our operational and supply chain practices by incorporating Modern Slavery considerations. In FY2020-2021 we have continued our continuous improvement approach to eliminating modern slavery risks, summarised in the diagram below, and detailed in this Modern Slavery Statement.

Modern Slavery considerations are now embedded in our operations, with focus on continuous improvement.

## Dimeo's approach to eliminating modern slavery risks





# Structure, Operations & Supply Chains



## DIMEO'S STRUCTURE

Dimeo Group Holdings Pty Ltd, ACN 630 189 758, trading as Dimeo Cleaning Services, is a privately-owned Australian company registered in Alexandria, NSW, Australia. Dimeo Group Holdings owns and controls several other entities for administrative, financial and employment purposes.



Dimeo Cleaning Services Pty Ltd is the head entity, which enters head contracts with Dimeo clients. Dimeo Cleaning Services issues head contract invoices and receives head contract payments on behalf of all other Dimeo owned entities.

Dimeo Management Services Pty Ltd is Dimeo's supplier entity, which enters contracts with Dimeo suppliers and contractors. It is responsible for payments to Dimeo suppliers and contractors.

All other Dimeo entities exist as administrative employment entities in various states and territories of Australia. These entities directly employ Dimeo employees, ensuring that the relevant awards and Enterprise Bargaining Agreements (EBAs) are appropriately administered.

In 2020 Dimeo Indigenous Pty Ltd, a Supply Nation Certified Indigenous owned and controlled Joint Venture, was added to the portfolio.

All Dimeo entities adhere to and utilise the same organisation-wide policies, procedures and systems. These include the Dimeo Modern Slavery Policy, Contractor Engagement Policy, Dimeo Speak Up (Whistleblowing) Policy, Grievance Policy, Dimeo Employee Code of Conduct and the Dimeo Supplier Code of Conduct, which are all publicly available via [Dimeo's website](#).



# Structure, Operations & Supply Chains



## DIMEO'S OPERATIONS

Dimeo is a trusted, premium-level provider of professional cleaning services in Australia. Our head office is located in Sydney, with operations in metropolitan, regional and country locations across the country. Dimeo has the broadest technical expertise in the cleaning sector, servicing government, high security, forensic, commercial office, industrial, branch, retail and education assets. Dimeo's clients include eminent organisations such as the Australian Government, State and Territory Governments, ASX100 companies and Australia's leading property owners, managers and tenants.

In FY2020-2021 Dimeo provided professional cleaning services across Australia utilising the highest responsible employment practices. We are extremely proud of the diversity of our workforce, with over 85% of Dimeo employees being of culturally and linguistically diverse backgrounds, and around 49% of our employees identifying as women.

Dimeo's supply chain is built on long-term relationships with reputable Australian based businesses. Our service providers comprise specialist cleaning and waste contractors, and our suppliers provide us with a range of cleaning products & equipment, detailed overleaf.

Dimeo utilises a unique proprietary framework for delivering excellence in our cleaning services operations. We are certified to Quality Management System ISO9001, Environment Management System ISO14001 and Occupational Health & Safety ISO 45001 Standards, with annual independent audits.

In FY2020-2021, COVID-19 continued to bring some fluctuations to Dimeo's usual operations. This year we experienced cycles of increased and decreased demand for our cleaning services – increases when clients required more intensive cleaning regimes to combat the spread of COVID-19 in their premises; and decreases when clients minimised usage of their premises due to government imposed 'work from home' health orders.

Positively, our supply chains returned to the stability of pre-COVID-19 times. With the stabilisation of supply in Australia of cleaning supplies, washroom products and personal protective equipment, we were able to return to our trusted, predominately Australian supply chain partners. Notwithstanding, we remain alert to the risk that COVID-19 could increase the vulnerability of our employees and workers in our supply chains to Modern Slavery.



# Structure, Operations & Supply Chains



## DIMEO'S SUPPLY CHAINS

Dimeo's supply chain is built on long-term relationships with reputable Australian based businesses. Dimeo has approximately 200 entities that are direct Tier 1 suppliers of products and services to our business. During FY2020-2021 we saw some fluctuations in our demand for products and services from our Tier 1 suppliers, however our top 25 suppliers consistently comprise approximately 85% of our overall annual supplier spend. Dimeo's supplier list is available for perusal upon request.

<b>SUPPLIERS - PRODUCTS</b> All suppliers are located in Australia.	Main types of Products provided to Dimeo	Main Source Countries
Cleaning Supplies	<ul style="list-style-type: none"> <li>Sprays, fluids, detergents, disposable gloves, rubbish bags, cloths, spray bottles, mops, brooms, buckets, trolleys, bins.</li> </ul>	Australia, China.
Uniforms & Personal Protective Equipment	<ul style="list-style-type: none"> <li>Shirts, name badges, trousers, hats.</li> <li>Hi-vis vests, eyewear, boots, masks, reusable gloves, overalls.</li> </ul>	Australia, China.
Equipment & Plant	<ul style="list-style-type: none"> <li>Vacuum cleaners, floor scrubbers, floor sweepers.</li> </ul>	China, Germany, USA.
Vehicles	<ul style="list-style-type: none"> <li>Cars, motorised carts.</li> </ul>	Australia, USA, Korea, Japan.
Washroom Supplies	<ul style="list-style-type: none"> <li>Paper towel, toilet paper, soap, sanitiser, cloth hand towels.</li> </ul>	Australia, China.
IT / Electronic Devices	<ul style="list-style-type: none"> <li>Computers, tablets, smartphones, radios / pagers.</li> </ul>	USA, China.
Office Supplies	<ul style="list-style-type: none"> <li>Furniture, stationery, catering.</li> </ul>	Australia, China.

<b>SUPPLIERS - SERVICES</b> All suppliers are located in Australia.	Main types of Services provided to Dimeo
Equipment Hire	<ul style="list-style-type: none"> <li>Plant and equipment hire companies provide short-term hire of items for specialist cleaning tasks.</li> </ul>
Equipment Maintenance & Repairs	<ul style="list-style-type: none"> <li>Periodic maintenance and repairs of Dimeo owned plant and equipment.</li> </ul>
General Cleaning Services	<ul style="list-style-type: none"> <li>Dimeo engaged cleaning sub-contractors where direct employment of frontline staff by Dimeo is not possible.</li> </ul>
General Waste Collection & Disposal	<ul style="list-style-type: none"> <li>Bulk waste collection and disposal.</li> </ul>
Linen Services	<ul style="list-style-type: none"> <li>Linen laundry services.</li> </ul>
Professional Business Services	<ul style="list-style-type: none"> <li>Auditing, Finance, HR, Legal, Marketing, Software development, Consultants, &amp; Travel.</li> </ul>
Sanitary Waste Collection & Disposal	<ul style="list-style-type: none"> <li>Feminine hygiene, biohazard waste, sharps disposal.</li> </ul>
Technical Window Cleaning	<ul style="list-style-type: none"> <li>Specialist technical window cleaning, usually at height.</li> </ul>



# Risks of Modern Slavery Practices



Dimeo acknowledges that every entity has the potential for Modern Slavery risks in its operations and supply chains and that every entity has the potential to 'cause', 'contribute to', or be 'directly linked to' Modern Slavery, as defined by the UN Guiding Principles.

Dimeo is committed to progressively eliminating potential Modern Slavery risks in our operations and supply chains, by working together with our employees, suppliers, clients, stakeholders and the broader industry.

In FY2020-2021 we reviewed our scoping exercise that examined areas in our operations and supply chains that may involve risks of Modern Slavery practices. We again considered Geographic Risks, Sector / Industry Risk, Product / Services Risks and Entity Risks, to identify and assess the areas in Dimeo's operations and supply chains that may involve risks of Modern Slavery.

Further in-depth assessment and prioritisation of risk areas is detailed in Section 4 of this Modern Slavery Statement.

- 01 Geography Risks:** Some countries may have higher risks of Modern Slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.
- 02 Sector or Industry Risks:** Certain sectors and industries may have high Modern Slavery risks because of their characteristics, products and processes.
- 03 Product or Services Risks:** Certain products and services may have high Modern Slavery risks because of the way they are provided or used.
- 04 Entity Risks:** Some entities may have particular Modern Slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.



# Risks of Modern Slavery Practices



## DIMEO'S OPERATIONS

Dimeo acknowledges that the broader Australian cleaning sector continues to have a high potential for Modern Slavery risks.

We are, therefore, diligent in our efforts in identifying potential areas of Modern Slavery risk in our own operations. Dimeo is eager to demonstrate to our current and future clients, and our broader stakeholders, that we are a committed and responsible cleaning business, focused on continuous improvement in eliminating risks of Modern Slavery practices in our operations.

When we consider our operations against Geographic Risks, Sector/Industry Risk, Product/Services Risks and Entity Risks, we continue to see that Sector / Industry Risks and Product / Services Risk pose a High Potential Causal Modern Slavery risk.

Building on our previous reporting period, we found that our continuous improvement approach to eliminating modern slavery risks (detailed on page 4) provides us with a sound process for identifying, assessing, addressing and monitoring Modern Slavery risks in our own operations.

Initial Scoping: Dimeo's Operations	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
<b>Geography Risks</b>		
<b>Dimeo Operations</b> Australia	Low potential	Cause
<b>Sector or Industry Risks</b>		
<b>Cleaning Services</b>	High potential	Cause
<b>Product or Services Risks</b>		
<b>Cleaning Services</b>	High potential	Cause
<b>Entity Risks</b>		
<b>Dimeo Group Holdings (trading as Dimeo Cleaning Services)</b> Reporting entity and the entities Dimeo owns and controls	Low potential	Cause



# Risks of Modern Slavery Practices



## DIMEO'S SUPPLY CHAINS

In addition to closely examining our own operations, we also examined Dimeo's suppliers of products and services to identify potential risks of Modern Slavery practices in our supply chain. In FY2020-2021 we focused on the examination of our direct Tier 1 suppliers and key Tier 2 suppliers. Further in-depth assessment and due diligence related to our suppliers is detailed in Section 4.

As reported in our FY2019-2020 Modern Slavery Statement, COVID-19 delayed our assessment of our key Tier 2 suppliers of products and services during that reporting period. Positively, in FY2020-2021 we commenced this assessment and due diligence to identify potential risks of Modern Slavery practices in our extended supply chain and this is detailed in Section 4.





# Risks of Modern Slavery Practices



## DIMEO'S SUPPLY CHAINS – PRODUCTS

During this period, we continued to examine the products in our supply chain, considering Geographic Risks, Sector / Industry Risk, Product / Services Risks and Entity Risks, to detect the products that may involve higher risks of Modern Slavery. Our findings are summarised in the table below.

Initial Scoping: Dimeo's Supply Chain - Products	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
<b>Geography Risks</b>		
<b>Tier 1 Suppliers – Products</b> • Australia	Low potential	Contribute or Linked
<b>Tier 2 &amp; below Suppliers - Products</b> • Australia • Germany • USA • China • Others not yet identified	Low to high potential	Linked
<b>Sector or Industry Risks</b>		
<b>Tier 1 Suppliers – Products</b> • Retail & Wholesale Trade • Warehousing & Logistics • Manufacturing	Low to high potential	Contribute or Linked
<b>Tier 2 &amp; below Suppliers - Products</b> • Manufacturing • Textiles • Retail & Wholesale Trade • Warehousing & Logistics	Low to high potential	Linked
<b>Product or Services Risks</b>		
<b>Tier 1, 2 &amp; Below Suppliers - Products</b>		
• Cleaning Supplies	High potential	Linked
• Uniforms & Personal Protective Equipment	High potential	Linked
• Equipment & Plant	High potential	Linked
• Vehicles	High potential	Linked
• Washroom Supplies	High potential	Linked
• IT / Electronic Devices	High potential	Linked
• Office Supplies	High potential	Linked
<b>Entity Risks</b>		
<b>Tier 1 Suppliers - Products</b> • Reputable Australian suppliers of products	Low potential	Contribute or Linked
<b>Tier 2 &amp; below Suppliers – Products</b> • Australian and overseas suppliers	Low to high potential	Linked



# Risks of Modern Slavery Practices



## DIMEO'S SUPPLY CHAINS – SERVICES

During this period, we continued to examine the services in our supply chain, considering Geographic Risks, Sector / Industry Risk, Product / Services Risks and Entity Risks, to detect the services that may involve higher risks of Modern Slavery. Our findings are summarised in the table below.

Initial Scoping: Dimeo's Supply Chain - Services	Level of Modern Slavery Risk	Dimeo's Connection to Potential Modern Slavery Risk (Cause / Contribute / Linked)
<b>Geography Risks</b>		
<b>Tier 1 Suppliers - Services</b> • Australia	Low potential	Contribute or Linked
<b>Tier 2 &amp; below Suppliers - Services</b> • Australia • Germany • USA • China • India • others not yet identified	Low to high potential	Linked
<b>Sector or Industry Risks</b>		
<b>Tier 1 Suppliers – Services</b> • Cleaning Services • Waste Services • Warehousing & Logistics • Professional Services • Software Development • Retail & Wholesale Trade	Low to high potential	Contribute or Linked
<b>Product or Services Risks</b>		
<b>Tier 1, 2 &amp; Below Suppliers - Services</b>		
• Equipment Hire	Low potential	Contribute or Linked
• Equipment Maintenance & Repairs	Low potential	Contribute or Linked
• General Cleaning Services	High potential	Contribute or Linked
• General Waste Collection & Disposal	High potential	Contribute or Linked
• Linen Services	High potential	Contribute or Linked
• Professional Business Services	Low potential	Contribute or Linked
• Sanitary Waste Collection & Disposal	High potential	Contribute or Linked
• Technical Window Cleaning	Low potential	Contribute or Linked
<b>Entity Risks</b>		
<b>Tier 1 Suppliers - Services</b> • Reputable Australian suppliers of products and services	Low potential	Contribute
<b>Tier 2 &amp; below Suppliers – Services</b> • Australian and overseas suppliers	Low to high potential	Linked



# Actions taken to assess & address risks, including due diligence & remediation processes



## ACTIONS DIMEO TAKES TO ASSESS RISKS

During the FY2019-2020 reporting period Dimeo developed the Dimeo Modern Slavery Risk Assessment Procedure, a systematic process for assessing Modern Slavery risks in our operations and supply chains. Adapted from the [Minderoo Foundation's Walk Free Modern Slavery Risk Screening Tool](#), our Modern Slavery Risk Assessment Procedure continues to provide us with a step-by-step method for looking into our operations and supply chains for potential Modern Slavery risks.

DIMEO RISK ASSESSMENT PROCEDURE	ASSESSING
1. Identify all Dimeo data sources	finance, accounts, contracts, itemised invoices, expenses.
2. Categorise data	including supplier by name, product and / or service type, total spend, company location (country of registration).
3. Sort data	by sector / industry, product / service type, company location/geography, total spend.
4. Calculate 'high spend'	suppliers with total spend greater than or equal to 5% of Dimeo's total yearly spend.
5. Research entity risk	of the 'high spend' suppliers, conduct initial high-level check of media / reputation.
6. Consider Dimeo's influence	of the 'high spend' suppliers, estimate proportion of supplier's turnover that Dimeo's contract represents.
7. Adherence to Dimeo approach	adherence to Dimeo's actions to address Modern Slavery risks, e.g. Dimeo Supplier Code of Conduct, Dimeo supplier contract.
8. Due diligence	initial high-level check of a supplier's Modern Slavery policies, procedures, management processes and reputation.

## ASSESSING RISKS – SCORING & PRIORITISING

Integrated into Dimeo's Modern Slavery Risk Assessment Procedure is a scoring system. The scoring system allocates higher scores to higher risk elements and lower scores to lower risk elements. A score card including relative risk weightings is utilised to calculate an overall score and risk status for each of Dimeo's suppliers. This approach provides us with a priority list of suppliers that require more in-depth assessment and due diligence.



# Actions taken to assess & address risks, including due diligence & remediation processes



## **DUE DILIGENCE – SUPPLIER ENGAGEMENT**

In FY2020-2021 Dimeo continued our program of communication and engagement with our supply chain to inform them about Dimeo's commitment to progressively eliminating Modern Slavery risks in our operations and supply chains. We communicated via letter and email with all our direct Tier 1 suppliers of products and services, advising them of:

- Dimeo's approach to eliminating Modern Slavery risks.
- Dimeo's revised and enhanced Modern Slavery Policy.
- Dimeo's updated policies, procedures, Supplier Code of Conduct and Contractor Agreement, all including Modern Slavery.
- Dimeo's Speak Up (Whistleblowing) Policy & procedures, applying to our suppliers, contractors and their employees.
- That some suppliers would be required to complete a Dimeo Modern Slavery Questionnaire.
- Encouraged all suppliers to complete the industry-wide Property Council of Australia Modern Slavery Assessment.
- Inviting suppliers to contact us with concerns, for guidance or additional information relating to Modern Slavery.

## **DUE DILIGENCE – SUPPLIER QUESTIONNAIRE – DIMEO & INDUSTRY WIDE**

In addition to our supply chain communications, we specifically asked our high priority Tier 1 suppliers to complete our Dimeo Modern Slavery Questionnaire, modelled on the Property Council of Australia's (PCA) Modern Slavery Assessment questionnaire. Dimeo see great value in supporting the expansion of this industry initiative and our communication with all Tier 1 suppliers specifically encourages them to register for and complete the PCA Modern Slavery Assessment.

Our Dimeo Modern Slavery Questionnaire for suppliers comprises sixteen simple and informative questions. Positively, in FY2020-2021 we expanded our supply chain due diligence by requesting that our Tier 1 suppliers provide information about their Tier 1 suppliers (that is, Dimeo's Tier 2 suppliers).

Our suppliers' responses have provided important information for our due diligence, helping us identify where Modern Slavery risks might exist and prioritise areas for further assessment in our Tier 1 and Tier 2 supply chain.



# Actions taken to assess & address risks, including due diligence & remediation processes



## ACTIONS DIMEO TAKES TO ADDRESS RISKS

During the FY2020-21 reporting period, Dimeo continued to reinforce Modern Slavery considerations in our operations, including throughout our governance, policies, procedures, employee conduct documentation and supplier engagement.

Governance	Policies & Procedures	Dimeo Employees	Supply Chain Contract Terms	Supplier Code of Conduct
Modern Slavery Statement considered by Board, half-yearly and full-yearly.	Dimeo Modern Slavery Policy as standalone policy including remediation.	Dimeo New Employee Induction explicitly includes a section on Modern Slavery Policy.	Dimeo's 'Corporate Contractor Agreement' explicitly includes Modern Slavery terms.	Supplier/Contractor Code of Conduct explicitly includes Modern Slavery.
Dimeo Director appointed as Compliance Officer.	Relevant Dimeo policies revised to include Modern Slavery, including: <ul style="list-style-type: none"> <li>✓ Speak Up (Whistleblowing) Policy.</li> <li>✓ Grievance Policy.</li> </ul>	Dimeo employee Induction explicitly includes sections on the Speak Up (Whistleblowing) and Grievance policies.	'Corporate Contractor Agreement' forbids Modern Slavery, as defined in <i>Modern Slavery Act 2018 (Cth)</i> .	
Ongoing monthly reporting to Board on Modern Slavery progress.	Contractor Engagement Policy includes Modern Slavery.	Dimeo Employee Code of Conduct explicitly includes Modern Slavery.	'Corporate Contractor Agreement' forbids sub-contracting without Dimeo's written consent.	
'Modern Slavery Risk' integrated into Dimeo risk management & monitoring processes.	Embedded Dimeo's Modern Slavery Statement procedure & process.	Dimeo 'New Employee Starter Pack' explicitly includes information about Modern Slavery.		



# Actions taken to assess & address risks, including due diligence & remediation processes



## GRIEVANCE PROCESSES

Dimeo has Modern Slavery integrated into our existing Grievance Policy and procedures, which is publicly available via the Dimeo website. Any employee or stakeholder can report potential Modern Slavery risks in Dimeo's operations or supply chain by contacting the Dimeo Compliance Officer directly or Dimeo's independent, external mediator phoneline, which we have expanded to specifically include management of concerns relating to Modern Slavery.

During FY2020-2021, Dimeo continued awareness-raising of its business-wide Speak Up (Whistleblowing) Policy and procedures. Dimeo is working to promote an environment where our employees, our contractors and the team members of Dimeo contractors, can report - without any fear of retaliatory action - concerns about serious instances of wrongdoing that they believe may be occurring, including Modern Slavery. Importantly, Dimeo's Speak Up Policy applies to our suppliers, contractors and their employees, providing a publicly available, supported mechanism for identification of Modern Slavery risks in our supply chain.

## REMEDIATION PROCESS

Dimeo supports the UN Guiding Principle's approach to remediation of adverse human rights impacts, such as Modern Slavery. Dimeo's Modern Slavery Policy and Grievance Policy detail the remediation process that we follow if an incidence of Modern Slavery is suspected or a concern is reported.

Fortunately, during the FY2020-2021 reporting period, Dimeo did not identify any instances of Modern Slavery in our operations or supply chains.

In the situation where Dimeo identifies that we have caused or contributed to Modern Slavery, we are committed to providing for, and cooperating in, the remediation of the impact on the victim. Dimeo will work towards remediating the adverse impact by restoring the victim to the situation they would have been in if the adverse impact had not occurred. Concurrently Dimeo will review our policies, procedures and processes to rectify the anomaly that enabled the situation to occur, and to prevent its recurrence.

Where Dimeo identifies that we are linked to Modern Slavery by a supply chain relationship, we will utilise our leverage, where possible, (either individually and / or in partnership with other stakeholders), to work with the supply chain entity to prevent or mitigate the harm and its recurrence. If this is unsuccessful, Dimeo will end our supply / contract relationship with the entity that caused the impact.



# Actions taken to assess & address risks, including due diligence & remediation processes



## **EMBEDDING - EMPLOYEE TRAINING**

We believe that all our employees should have safe and stable employment and be alert to the potential risks of Modern Slavery in our operations and supply chains. Dimeo helps our employees to be informed about their rights and responsibilities through readily available information and regular training.

All new Dimeo employees are provided with a 'New Starter Pack' which is an easy-to-understand document that includes our Modern Slavery, Speak Up (Whistleblowing) and Grievance policies; Dimeo Code of Conduct; fact sheets from Fair Work Australia; and information about United Voice (the cleaning industry's primary Trade Union). Importantly, Dimeo understands that many of our employees have English as an additional language, so we welcome and encourage use of formal and informal language interpreters to help our new employees understand the information we provide.

Dimeo also has a strict policy that requires all new employees to participate in a face-to-face New Employee Induction which includes all the New Starter Pack topics and information. Dimeo has all new employees participate in this Induction training, which references our Modern Slavery Policy.

Existing Dimeo employees also participate in regular compliance training and information sessions relating to company policies, including Modern Slavery. In FY2020-2021, Dimeo continued our company-wide training about our Modern Slavery Policy for all employees, with frontline employees, supervisors, managers and office-based employees all participating in the Modern Slavery 'toolbox talk' presentation.

Dimeo continues to have Modern Slavery integrated into our employees' company training plans. Modern Slavery training for frontline employees and supervisors occurs on a six-monthly basis via face-to-face inductions, and for office-based employees (including our board, executive leaders, human resources, procurement, finance and shared services teams) via annual compliance training.

All Dimeo employee participation in training, including about Modern Slavery, is systematically documented, retained and filed as part of our Quality Management System ISO9001 compliance requirements.

Dimeo's site-specific Work Health & Safety (WHS) Management Plans continue to include Dimeo's Modern Slavery Policy, making the Policy physically available at each Dimeo workplace and integrating the Policy into Dimeo's established Quality Management System ISO9001 certification and compliance systems. Importantly, Dimeo's WHS Site Management Plans are independently audited by ISO annually to ensure consistency and compliance.



# Actions taken to assess & address risks, including due diligence & remediation processes



## EMBEDDING – SUPPLIER EDUCATION

Through the Due Diligence - Supplier Engagement process detailed above, Dimeo shares information about Modern Slavery with our supply chain. Specifically, Dimeo’s direct contractors and suppliers were informed about Dimeo’s Modern Slavery Policy, which includes information about the importance of the *Modern Slavery Act 2018* (Cth). In FY2020-2021, Dimeo expanded our supplier and contractor education, particularly through participation on client-led Modern Slavery working groups and workshops.

## EMBEDDING – INDUSTRY COLLABORATION & INITIATIVES

Dimeo has been an advocate for positive change in the Australian cleaning industry for many years. In FY2020-2021, Dimeo continued our collaboration with a range of industry initiatives, stakeholder organisations and clients, ensuring that we remain at the forefront of developments in Modern Slavery risk management in the cleaning industry.

Cleaning Accountability Framework (CAF)	Property Council of Australia (PCA) Modern Slavery Questionnaire	Collaboration with Clients & other Businesses	Supply Chain Sustainability School of Australia
Dimeo is a participant in CAF. CAF is an independent, multi-stakeholder initiative seeking to improve labour and cleaning standards in Australia.	Dimeo is an Associate Member of PCA. PCA key members developed an industry-first online Modern Slavery questionnaire to engage suppliers in Modern Slavery risk management.	Dimeo is an important part of the supply chains of many eminent Australian organisations, including Federal and State / Territory Governments.	Dimeo is a member of the Supply Chain Sustainability School of Australia.
In 2019 Dimeo became one of the first cleaning companies in Australia to receive a CAF 3 Star Certification (highest level, at the time) for its operations in partnership with CBRE and Charter Hall at 333 George St, Sydney.	Dimeo updates and maintains its details and Modern Slavery information in the PCA Modern Slavery Questionnaire.	Dimeo collaborates with and actively participates in training, initiatives, information sharing, and auditing processes instigated by our clients who are conducting their own Modern Slavery due diligence of supply chains.	Dimeo’s appointed Compliance Officer has completed Supply Chain Sustainability School’s Modern Slavery e-learning modules.
In December 2020 Dimeo participated in and secured a CAF 3 Star Certification for Angle Place, Sydney, led by asset owner AMP.			Dimeo implemented Modern Slavery e-learning / training for senior management.



# Actions taken to assess & address risks, including due diligence & remediation processes



## EMBEDDING - INDUSTRY COLLABORATION & INITIATIVES

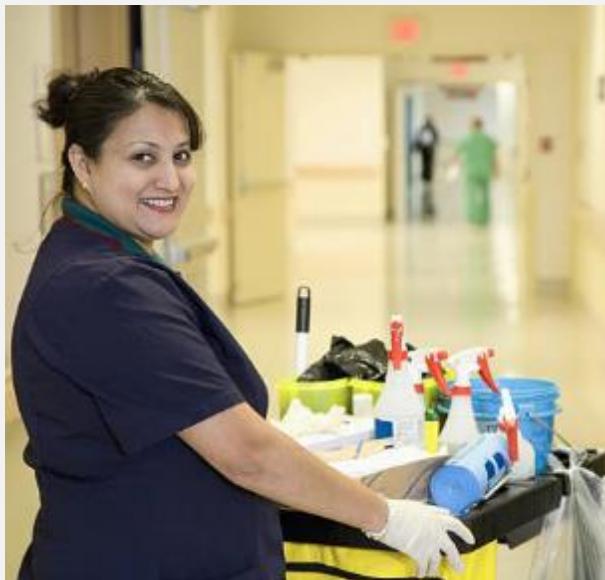
As anticipated in our FY2019-2020 Modern Slavery Statement - Section 7. Next Steps, during the FY2020-2021 period Dimeo openly participated in several client-led examinations of our approach to addressing Modern Slavery risks in our operations. This included successful completion of clients' supplier questionnaires and invitation to join client Modern Slavery working groups and present at workshops.

Additionally, Dimeo has joined EcoVadis, a leading global business assessment and rating platform, to provide Modern Slavery data to our clients. In FY2020-2021, Dimeo's EcoVadis report was accessed by The Australian Stock Exchange (ASX) and CBRE.

### Collaboration with Clients & other Businesses

Dimeo successfully completed Modern Slavery supplier questionnaires from Clients including:

- ✓ Westpac
- ✓ Commonwealth Bank of Australia (CBA)
- ✓ The Australian Stock Exchange (ASX)
- ✓ CBRE
- ✓ Willis Towers Watson
- ✓ Charter Hall
- ✓ Price Waterhouse Coopers (PWC)
- ✓ Ernst & Young



## CASE STUDY – WESTPAC MODERN SLAVERY WORKGROUP

In 2020, Dimeo was invited to partner with one of its major customers, a major financial institution, to investigate and manage the risks of modern slavery in our supply chains.

It was acknowledged that working collaboratively would be a more effective way to identify, address and mitigate these risks.

Alignment in our processes and policies was achieved through sharing information including questions asked in our respective supplier questionnaires. Greater supply chain transparency, with visibility down to Tier 3 suppliers in some high-risk categories, was also achieved through the partnership.

A deep-dive into corporate apparel was one focus area of the partnership, with further due diligence steps still ongoing.



# How we assess effectiveness of actions we take to assess & address Modern Slavery risks



As an integral part of our continuous improvement journey, Dimeo places great importance on ensuring the effectiveness of the actions we take to assess and address Modern Slavery risks in our operations and supply chains.

## INTERNAL MONITORING & REPORTING

Modern Slavery Risk has been formally added to Dimeo's integrated risk management framework. This is managed by our executive team, with oversight and ultimate responsibility resting with our Board of Directors. Additionally, Dimeo's Board monitors the progress of our Modern Slavery actions monthly and approves the full-year Modern Slavery Statement.

To further strengthen our internal monitoring and reporting processes, Dimeo's appointed Compliance Officer who is responsible for grievances, complaints and Speak Up (Whistleblowing), including in relation to Modern Slavery, is also a Director of the company.

During FY2021-2022 we plan to formally define Modern Slavery key performance indicators (KPIs) to help us consistently monitor and measure how our Modern Slavery approach is progressing.

## EXTERNAL REPORTING

Dimeo was proud that our FY2019-2020 Modern Slavery Statement was included in the first tranche of 120 Statements published on [Australian Border Force's Online Register of Modern Slavery Statements](#) in late 2020. We were also the only cleaning company in this cohort.

In FY2020-2021, we had planned to refresh our Dimeo website and introduce a dedicated section for Modern Slavery reporting and information, so that our employees, suppliers, contractors, clients and broader stakeholders could easily examine the progress and effectiveness of Dimeo's Modern Slavery actions. Unfortunately, we were unable to refresh our website and plans are now in place for this activity to take place in FY2021-2022.

## AUDITING & COMPLIANCE

Dimeo holds certifications in Quality Management System ISO9001, Environment Management System ISO14001 and Occupational Health & Safety AS/NZS 4801 Standards. By integrating Modern Slavery risk management elements into Dimeo's operational systems, we have also embedded them into our ISO certification and compliance requirements. Importantly, Dimeo's operations, including Modern Slavery actions, will continue to be independently audited annually to ensure we maintain the highest possible level of compliance with ISO and Australian standards.

As an important part of the supply chains of many large and eminent Australian organisations that are themselves required to report under the Commonwealth's *Modern Slavery Act 2018.*, Dimeo has successfully participated in client-led auditing of our approach to eliminating Modern Slavery risks in our operations and supply chains.



# Consultation with entities Dimeo owns or controls



As detailed in Section 1, Dimeo Group Holdings Pty Ltd, trading as Dimeo Cleaning Services, as the Modern Slavery Statement reporting entity, is associated with several other entities that it owns and controls. These associated entities exist to manage a national payroll with varying awards and Enterprise Bargaining Agreements (EBAs) and for administrative purposes.

All Dimeo entities adhere to the same organisation-wide policies and procedures set by Dimeo Cleaning Services, including the Dimeo Modern Slavery Policy.

Consultation across all the entities occurs via a consistent Executive Director who is a responsible person for all Dimeo's related entities. The Executive Director participates extensively in the Modern Slavery statement processes and, as such, Dimeo is satisfied that the Modern Slavery risks relating to its entities have been and will continue to be appropriately identified, assessed and addressed where necessary.





# Other relevant information



## NEXT STEPS IN DIMEO'S MODERN SLAVERY JOURNEY

During FY2020-2021 Dimeo made significant progress in our approach to eliminating Modern Slavery risks in our operations and supply chains. Our efforts were focused on enhancing our operational and supply chain practices by incorporating and embedding Modern Slavery considerations.

With focus on continuous improvement, in FY2021-2022 Dimeo plans to further embed and strengthen our approach to Modern Slavery, including:

- Defining and monitoring key performance indicators (KPIs) to measure how effective our Modern Slavery approach has been.
- Identifying potential risks of Modern Slavery practices in our Tier 2 suppliers.
- Expanding the Dimeo Modern Slavery Questionnaire to our key Tier 2 suppliers.
- Distributing awareness raising Modern Slavery posters at Dimeo workplaces.
- Including awareness raising Modern Slavery leaflets in Dimeo employees' New Starter Packs.
- Developing relationships with not-for-profit organisations that can assist with enhancing our approaches to grievance and remediation e.g., Anti-Slavery Australia, Australian Red Cross.
- E-Learning / training of Dimeo management in Modern Slavery topics.
- Refreshing our Dimeo website and introduce a dedicated section for Modern Slavery reporting and information.

Our progress in these areas will be reported in our FY2021-2022 Modern Slavery Statement.





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