

# Modern Slavery Statement

## D&M Lyone Holdings Pty Ltd FY2020

This statement covers the activities of D&M Lyone Holdings Pty Ltd (ACN 45102456851) (D&M) during the year ended 30 June 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the sole director of D&M on 31 March 2021.

### **About us**

At D&M, we recognise that respecting the human rights of those affected by our business activities is important. We endeavour to make a positive and real difference to our immediate and greater community through our operations and wider supply chain.

### ***Our structure***

D&M is a company incorporated in New South Wales, Australia and our registered office is located at 25 Nyrang Street Lidcombe New South Wales 2141.

D&M is an investment company focused primarily in commercial property in addition to sole shareholder in a separate entity Complete Office Supplies (COS), a cleaning and office supplies distribution business. COS' employees are engaged by Complete Office Staffing, a related entity which is also wholly owned by D & M. D&M also own a number of commercial properties tenanted by COS as well as other property investments.

COS qualifies as a reporting entity under the terms of the Modern Slavery Act and has published its own Modern Slavery Statement.

### ***Our operations***

As an investment company our operations are minimal. Our commercial investment properties are tenanted. Our main business investment is in COS and its related entity Complete Office Staffing.

COS is a business-to-business cleaning and office products supplier. COS was founded in NSW in 1977 by the current CEO Dominique Lyone. In the last 45 years, COS has grown to become a national supplier to both Government and Corporate Australia, offering a next day delivery service for thousands of products for every room in an office to over 20,000 customers across Australia. The COS operations span across Australia, with employees, warehouses and an extensive driver network in every state and territory.

### ***Our supply chain***

As an investment business our supply chain is minimal. We procure minimal goods and services. Our properties are tenanted and the tenants hold responsibility for the cleaning and maintenance services.

### **Modern slavery risks**

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

## ***Risk assessment methodology***

We undertook a risk assessment which considered a number of indicators of modern slavery risks including the type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

## ***Risk profile***

<b>Risk</b>	<b>Description of risk</b>
Services	<i>Commercial properties require cleaning services which have been an area of higher potential of modern slavery.</i>
Geographic	<i>Our investments are all based in Australia which are classified as having lower modern slavery risk.</i>
Specific Entity	<i>One of our investments COS does operation within a medium area of risk as they procure thousands of products to onsell to Australian Businesses.</i>

## **Actions to assess and address risk**

We understand the importance of working collaboratively with our employees and suppliers to combat modern slavery.

### ***Due diligence***

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains. It was identified that as an investment company our risk of modern slavery is low.

In FY2020, we ensured the management team of our main investment COS were well informed of the Modern Slavery Act and had the resources required to submit their first statement.

### ***Governance and accountability framework***

An internal modern slavery working group was established in our main operating entity COS to lead the assessment of our risks of modern slavery and implement actions to address those risks. As part of training, all members of the modern slavery working group reviewed the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. T

## **Assessing our effectiveness**

We are committed to reviewing the effectiveness of our actions by:regularly reviewing our modern slavery processes in our owned entities with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks

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## **Consultation**

D&M consulted with owned and controlled entities COS & Complete Office Staffing to ensure modern slavery risks were being identified and assessed.

During FY2020, there was consistent consultation and collaboration between the executive leadership of COS and the modern slavery working group within COS.

## **FY2021 focus**

As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In FY2021 we will focus on implementing improved initiatives and strategies with a focus on targeting supply chains that may facilitate modern slavery. These strategies will include:

- a review of our risk assessment methodology to incorporate learnings from the first reporting period
- conducting targeted training for relevant staff in procurement, recruitment and compliance roles, to raise awareness of modern slavery risks and how they may arise in our business;
- reviewing the grievance mechanism in place for concerns of modern slavery to be raised by employees, suppliers and members of the public.

This statement was approved by the sole director of D&M on 31 March 2021.



**Dominique Lyone**  
Director