

DIMEO GROUP HOLDINGS PTY LTD  
MODERN SLAVERY STATEMENT



FY2022-2023 REPORTING PERIOD

in accordance with the requirements of the Australian Commonwealth **Modern Slavery Act 2018**

OCTOBER 2023 – BOARD APPROVED 10TH OCTOBER 2023



# Contents – Statement Annexure



The following pages of Dimeo Group Holdings Pty Limited’s Modern Slavery Statement address each of the mandatory criteria required by the **Australian Commonwealth Modern Slavery Act 2018**.

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1. The Reporting Entity
  - i. Approval by the Principal Governing Body
  - ii. Signature of Responsible Member



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

**ACN: 630 189 758**

**Registered Address:** On Gadigal Country, Unit 14, 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.

### **i. APPROVAL BY THE PRINCIPAL GOVERNING BODY**

On 10th October 2023, this Modern Slavery Statement for FY2022-2023 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 2018* (Cth) (“the Act”).

### **ii. 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



# 1 iii. Dimeo's Approach

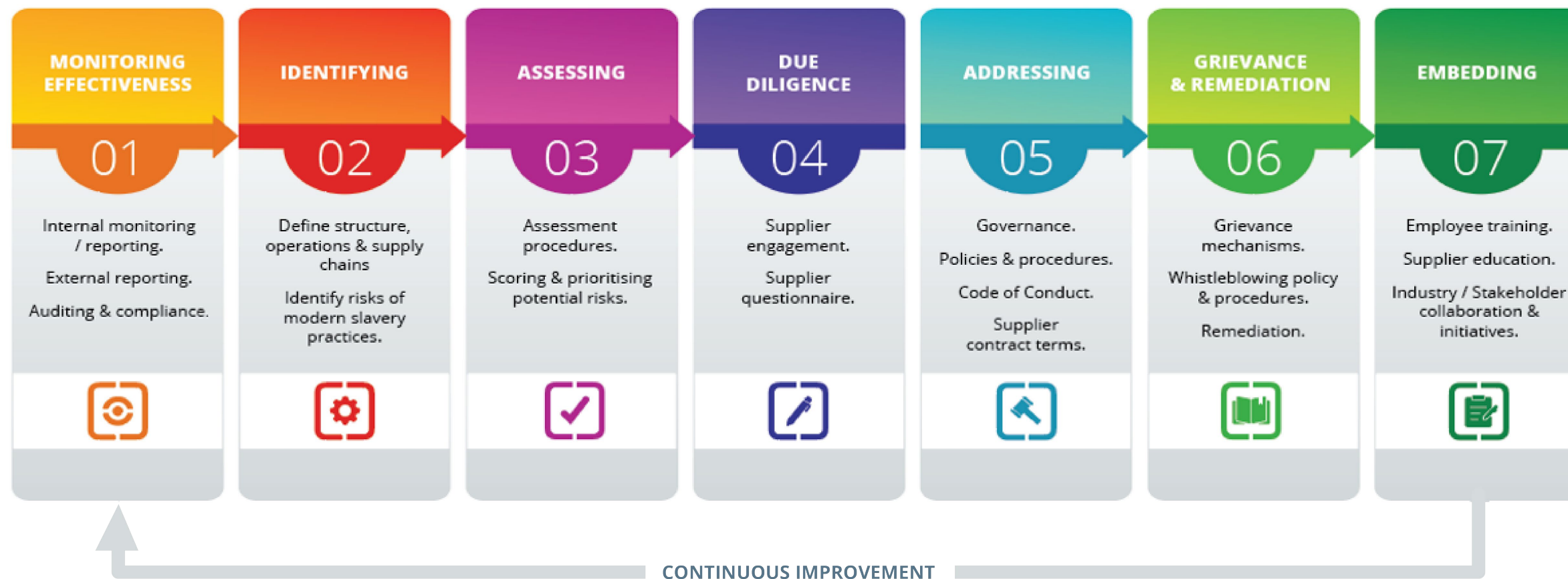


Dimeo Group Holdings Pty Ltd (Dimeo), is pleased to produce this Modern Slavery Statement for FY2022-2023, in accordance with the requirements of the Australian Commonwealth **Modern Slavery Act 2018**.

Our FY2022-2023 Modern Slavery Statement provides an overview of Dimeo's fourth year of activities in eliminating Modern Slavery Risks in our operations and supply chains via the continuous improvement processes summarised in the diagram below.

Since our first Modern Slavery Statement in FY2019-2020, Dimeo's understanding of Modern Slavery has matured. Our continuous improvement processes have enabled us to refine our Modern Slavery activities and develop processes and procedures that are tailored to our business, our supply chain and our stakeholders.

## DIMEO'S APPROACH TO ELIMINATING MODERN SLAVERY RISKS





## 1 iii. Dimeo's Approach



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.

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 understand that this includes taking action to prevent, mitigate and, where required, remedy Modern Slavery in our operations and supply chains.

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.



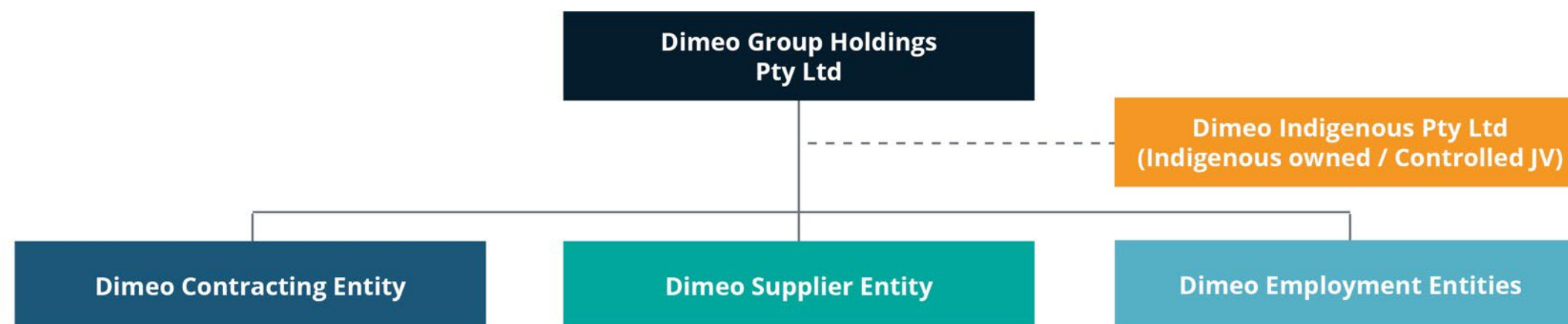


## 2. Structure, Operations & Supply Chains



### 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, employment and financial 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 Agreements (EAs) are appropriately administered.

Dimeo Indigenous Pty Ltd is a Supply Nation Certified Indigenous owned and controlled Joint Venture.

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 available on request from the [Dimeo website](#).



## 2. Structure, Operations & Supply Chains



### DIMEO'S OPERATIONS

Dimeo is a trusted, premium-level provider of professional cleaning services in Australia. Our head office is in Sydney, with operations in metropolitan, regional and rural locations across the country. Dimeo has the broadest technical expertise in the Australian cleaning sector, servicing government, industrial high security, forensic, commercial office, 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 and managers.

Dimeo's operations utilise our unique proprietary framework for delivering excellence in cleaning services, certified to Quality Management System ISO9001, Environment Management System ISO14001 and Occupational Health & Safety ISO45001 Standards, with annual audits.

**During FY2022-2023 Dimeo employed approximately 4,000 staff across Australia, utilising the highest responsible employment practices.** We are proud of the diversity of our workforce, with over 85% of Dimeo employees being of culturally and linguistically diverse backgrounds, and over 50% of our employees identifying as women. Dimeo's staff satisfaction and retention rates are amongst the highest in the Australian cleaning sector.

In FY2022-2023 the impact of the Coronavirus (COVID19) pandemic diminished, bringing Dimeo's operations to usual, consistent levels. Australia's continuing low unemployment and high job vacancy rates have meant that staff are more likely to pursue employment outside of the cleaning industry. For Dimeo, this appears to have minimised the risk of Modern Slavery in our operations, as workers who would have traditionally taken up entry-level employment in cleaning or its supply chains, now have a greater range of entry-level jobs available to them. Notwithstanding, we remain alert to the impacts that changes in COVID19, migration and employment can have on our employees and workers in our supply chains.

Dimeo's operations require close cooperation with our supply chain, and we value trusting, transparent supply chain relationships. Since our formation in 1980 we have built strong, long-term relationships with many reputable Australian based service providers and suppliers. Our service providers comprise specialist cleaning and waste contractors, and our product suppliers provide us with a range of cleaning products and equipment, as detailed overleaf.



## 2. Structure, Operations & Supply Chains

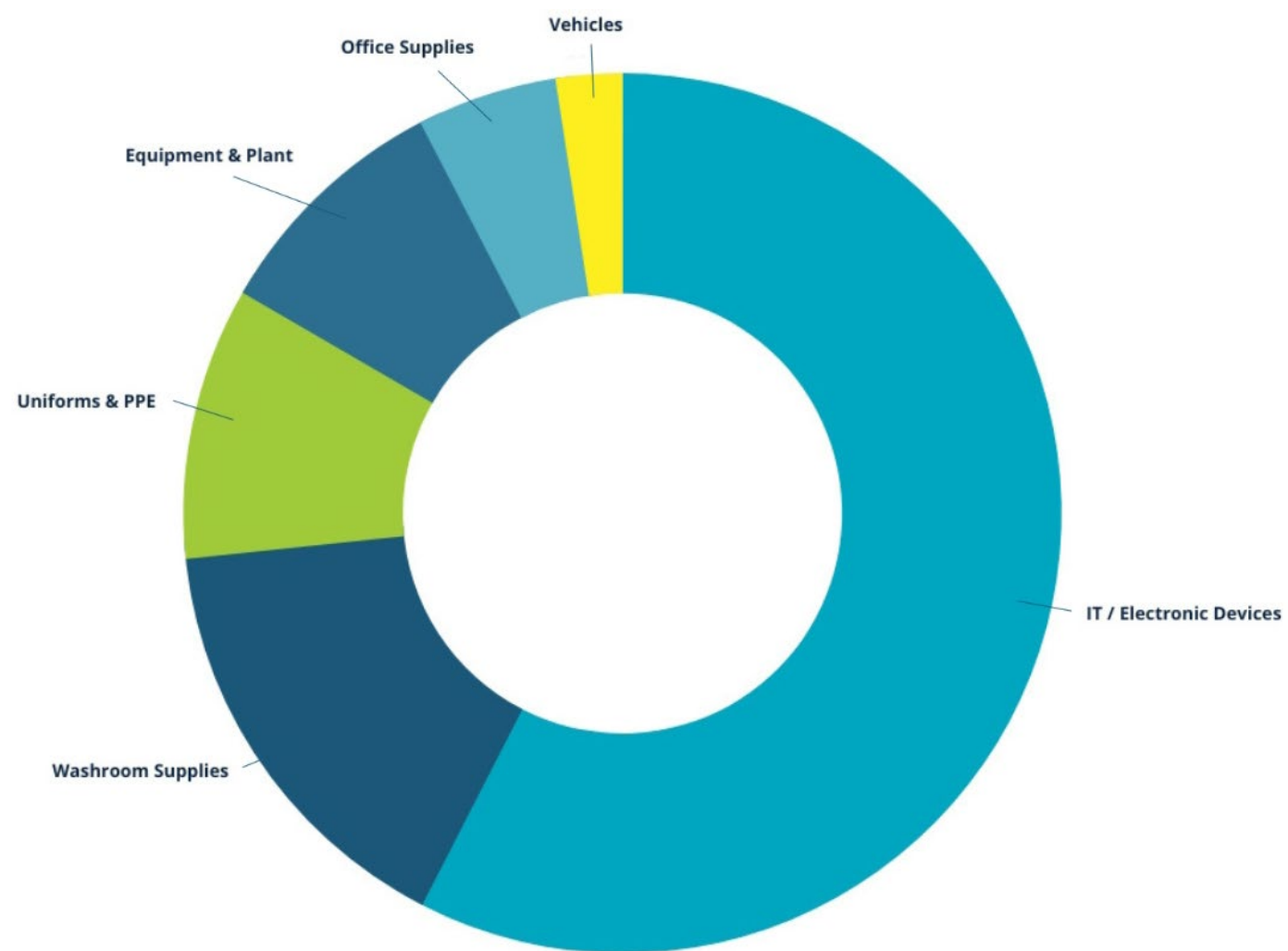


### DIMEO'S SUPPLY CHAINS

Dimeo's supply chains are 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. Our top 25 Tier 1 suppliers consistently comprise approximately 85% of our overall annual supplier spend. Dimeo's supplier list is available for perusal upon request.

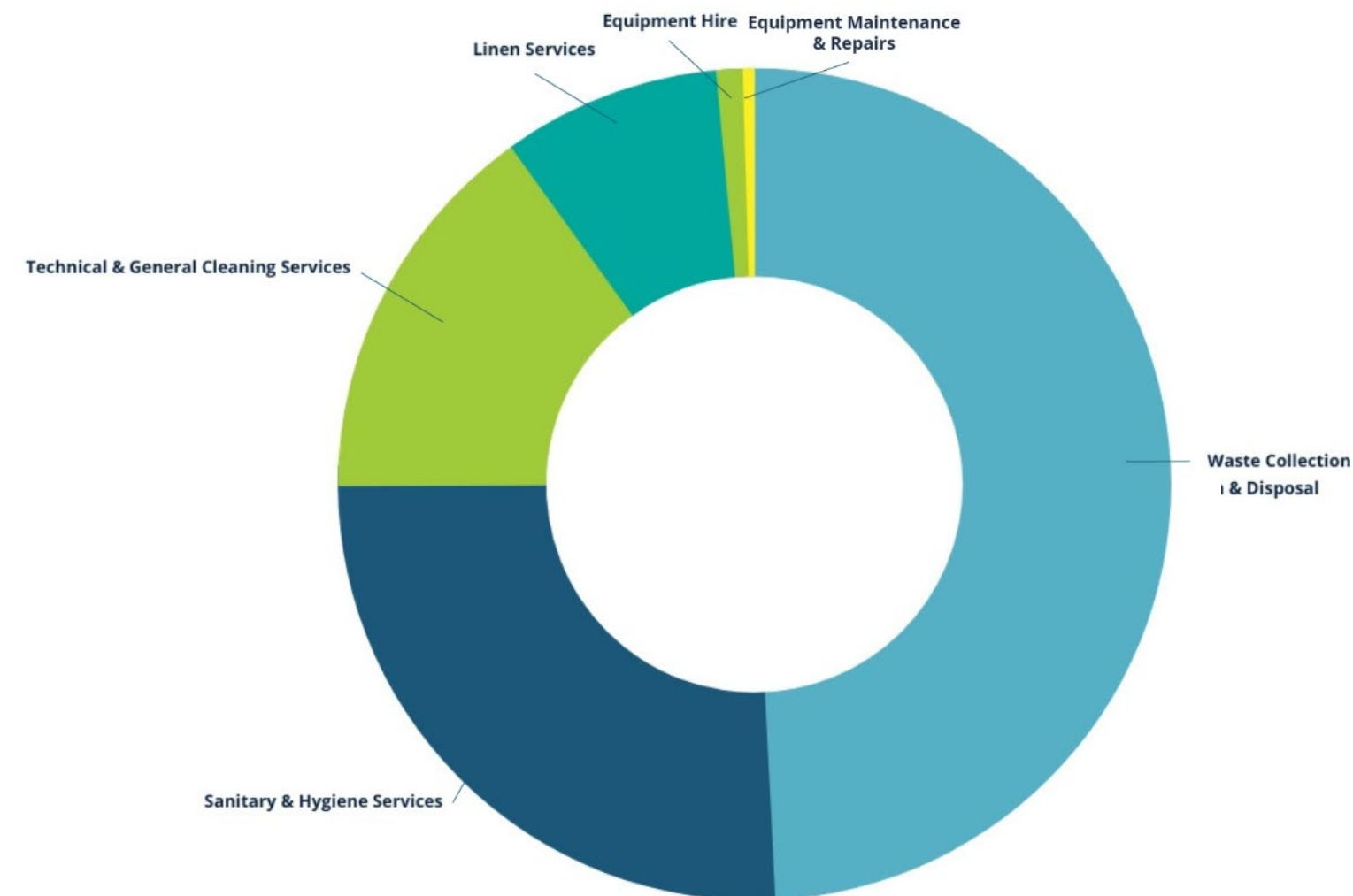
#### SUPPLIERS PRODUCTS

All Product suppliers Australian based companies.



#### SUPPLIERS SERVICES

All Services suppliers are Australian based companies.







### 3. Risks of Modern Slavery Practices



As highlighted by the UN Guiding Principles, Dimeo acknowledges that every entity has potential 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.

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

In accordance with our continuous improvement processes Dimeo undertakes an annual scoping exercise of our operations and supply chains, considering Geographic risks, Sector / Industry risk, Product / Services risks and Entity risks.

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

<p><b>01</b></p> <p><b>Geography Risks</b></p> <p>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.</p>	<p><b>02</b></p> <p><b>Sector or Industry Risks</b></p> <p>Certain sectors and industries may have high Modern Slavery Risks because of their characteristics, products and processes.</p>
<p><b>03</b></p> <p><b>Product or Services Risks</b></p> <p>Certain products and services may have high Modern Slavery Risks because of the way they are provided or used.</p>	<p><b>04</b></p> <p><b>Entity Risks</b></p> <p>Some entities may have Modern Slavery Risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>



### 3. 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 considering potential areas of Modern Slavery Risks in our own operations. Dimeo is eager to demonstrate to our current and future clients, and our broader stakeholders, that we are a responsible cleaning business focused on continuous improvement in eliminating risks of Modern Slavery 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.

By building on our previous reporting periods, we find that our continuous improvement approaches to eliminating Modern Slavery Risks (detailed on page 3) provides us with a robust process for identifying, assessing, addressing and monitoring potential Modern Slavery Risks in our own operations.

<p><b>01</b></p> <p><b>Geography Risks</b></p> <p>Dimeo Operations are in Australia Only</p> <p><b>Level of Modern Slavery Risk</b> – Low potential</p> <p><b>Connection to Potential Modern Slavery Risk</b> – Cause</p>	<p><b>02</b></p> <p><b>Sector or Industry Risks</b></p> <p>Cleaning Services</p> <p><b>Level of Modern Slavery Risk</b> – High potential</p> <p><b>Connection to Potential Modern Slavery Risk</b> – Cause</p>
<p><b>03</b></p> <p><b>Product or Services Risks</b></p> <p>Cleaning Services</p> <p><b>Level of Modern Slavery Risk</b> – High potential</p> <p><b>Connection to Potential Modern Slavery Risk</b> – Cause</p>	<p><b>04</b></p> <p><b>Entity Risks</b></p> <p>Dimeo Group Holdings (trading as Dimeo Cleaning Services)</p> <p><b>Level of Modern Slavery Risk</b> – Low potential</p> <p><b>Connection to Potential Modern Slavery Risk</b> – Cause</p>



### 3. Risks of Modern Slavery Practices



#### DIMEO'S SUPPLY CHAINS

In addition to closely examining our own operations, Dimeo also examines our suppliers of products and services to identify potential Modern Slavery Risks in our supply chains.

In FY2022-2023 we embedded our procedures for assessing our Tier 1 suppliers and their supply chains (that is, Dimeo's Tier 2 suppliers), as refined during the FY2022 period.

#### DIMEO'S SUPPLY CHAINS PRODUCTS AND SERVICES

During the FY2022-2023 period, Dimeo's operations returned to pre-COVID-19 levels and our supply chains for products and services were almost identical to the FY2022 reporting period.

We continue to examine the products and services in our supply chains, considering Geographic Risks, Sector / Industry Risk, Product / Services Risks and Entity Risks, to detect any possible changes in Modern Slavery Risks.

Our procedures for assessment and due diligence relating to our suppliers is detailed in Section 4.





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



### ACTIONS DIMEO TAKES TO ASSESS RISKS

During the FY2022-2023 reporting period we embedded our Dimeo Modern Slavery Risk Assessment Procedure - our systematic process for assessing Modern Slavery Risks in our supply chains. Adapted from the [Minderoo Foundation's Walk Free](#) Modern Slavery Risk Screening Tool, our Modern Slavery Risk Assessment Procedure provides us with a method for assessing our supply chains for potential Modern Slavery Risks.

DIMEO RISK ASSESSMENT PROCEDURE	ASSESSING
1. Identify 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. Entity's Modern Slavery Capabilities	of the 'high spend' suppliers, their Modern Slavery capabilities. Eg large entities (Bunnings, Coles) have extensive capabilities.
6. Research entity risk	of the 'high spend' suppliers, conduct initial high-level check of media / reputation.
7. Consider Dimeo's influence	of the 'high spend' suppliers, estimate proportion of supplier's turnover that Dimeo's contract represents.
8. Adherence to Dimeo approach	adherence to Dimeo's actions to address Modern Slavery Risks, eg. Dimeo Supplier Code of Conduct, Dimeo supplier contract.
9. 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 supplier. This approach indicates a priority list of suppliers that may require more in-depth assessment and due diligence.



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



### **DUE DILIGENCE** SUPPLIER ENGAGEMENT

In FY2022-2023 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 with all our Tier 1 suppliers of products and services, advising them of:

- Dimeo's approach to eliminating Modern Slavery risks.
- Dimeo's Modern Slavery Policy.
- Dimeo's 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.
- Categorising all suppliers into Low, Medium and High Risk.
- All suppliers in the Medium and High-risk categories were required to complete a Dimeo Modern Slavery Questionnaire (see below).
- Responses to these questionnaires have been reviewed and followed up where necessary.
- Inviting suppliers to contact us with concerns, for guidance or additional information relating to Modern Slavery.

### **DUE DILIGENCE** DIMEO SUPPLIER QUESTIONNAIRE

In addition to our supply chain communications, we specifically asked our Tier 1 suppliers to complete our Dimeo Modern Slavery Questionnaire, modelled on the Property Council of Australia's (PCA) Modern Slavery Assessment questionnaire. Our Dimeo Modern Slavery Questionnaire for suppliers has been updated to include 19 simple and informative questions and expanded to request that our Tier 1 suppliers provide information about their potential high-risk 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 priority areas for further assessment in our Tier 1 and Tier 2 supply chain.



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



### ACTIONS DIMEO TAKES TO ADDRESS RISKS

During the FY2022-2023 reporting period, Dimeo continued to reinforce Modern Slavery considerations in our operations, including across our governance, policies, procedures, employee conduct documentation, supplier engagement and stakeholder relationships.

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 online Employee Induction, EdApp explicitly includes 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 as appointed Compliance Officer.	Relevant Dimeo policies explicitly 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 <b>Modern Slavery Act 2018 (Cth)</b> .	
Ongoing reporting to Board on Modern Slavery progress.	Contractor Engagement Policy explicitly 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.	Dimeo's Modern Slavery Statement procedure & process embedded in business operations.	All existing and new staff complete Dimeo's new online induction modules.		



## 4. 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 available via Dimeo's 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 phonenumber, which specifically includes management of concerns relating to Modern Slavery.

**Speak Up (Whistleblowing):** During FY2022-2023, 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 concerns about serious instances of wrongdoing that they believe may be occurring, including Modern Slavery. Importantly, Dimeo's Speak Up Policy extends to our suppliers, contractors and their employees, providing a publicly available, supported mechanism for identification of Modern Slavery Risks in our operations and supply chains.

**Direct Worker Consultation:** Importantly, Dimeo also consults with and seeks feedback directly from our employees including through regular on-site 'Tool Box Talk' meetings and more formally through our participation in Cleaning Accountability Framework (CAF) certification where we must demonstrate genuine direct worker consultation as part of our Modern Slavery Risk assessment processes and broader labour practices (see Case Study – Cleaning Accountability Framework on page 17).

### REMEDIATION PROCESSES

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

**Fortunately, during the FY2022-2023 reporting period, Dimeo had no suspected incidences or concerns 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 anomalies 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.



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



### EMBEDDING EMPLOYEE TRAINING

Dimeo employees play an important role in identifying potential Modern Slavery Risks in our operations and supply chains. We provide regular training and information to our employees, so they know how to recognise the signs and act if they suspect Modern Slavery.

**Employee Induction:** On 1 July 2022 Dimeo launched our company-wide online employee induction tool, EdApp, to streamline our induction of new staff and provide more accurate reporting of staff induction completion rates. EdApp is an easy-to-understand portal that includes our Modern Slavery, Speak Up (Whistleblowing) and Grievance Policies; Dimeo Code of Conduct; information from Fair Work Australia and United Voice (the cleaning industry's primary Trade Union). In the FY2022-2023 reporting period, 99% of all Dimeo staff completed the online induction, ensuring that our employees are aware of Dimeo's Modern Slavery Policy and related information.

**Compliance Training:** Dimeo employees also participate in regular compliance training relating to company policies, including Modern Slavery. All training is systematically documented as part of our Quality Management System ISO9001 requirements. In FY2022-2023, 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 annual Modern Slavery 'ToolBox Talk' presentation. Office-based employees (our Board, executive leaders, HR, procurement, finance and shared services teams) also completed annual compliance training including Modern Slavery.

Dimeo's site-specific Work Health & Safety (WH&S) 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 WH&S Site Management Plans are audited annually to ensure compliance.

**Educational Posters:** To further raise staff awareness of Modern Slavery, Dimeo continues to distribute adapted Australian Red Cross Modern Slavery educational posters for display on staff notice boards/cleaners' rooms. To date, these posters have been distributed to all Dimeo operating locations and posted in cleaners' rooms and offices where appropriate.







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



### EMBEDDING SUPPLIER EDUCATION

In FY2022-2023, Dimeo continued our contribution to supplier and contractor education, particularly through participation in client-led Modern Slavery working groups and workshops. Dimeo also continues to educate our supply chain about Modern Slavery through our 'Due Diligence – Supplier Engagement' processes detailed on page 12. In FY2022-2023 we continued our practice of raising and discuss the importance of Modern Slavery with our existing suppliers during their periodic contract reviews.

### EMBEDDING INDUSTRY COLLABORATION & INITIATIVES

Dimeo has been an advocate for positive change in the Australian cleaning industry for many years. In FY2022-2023, we 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	EcoVadis
Dimeo is an active participant in CAF, an independent, multi-stakeholder initiative seeking to improve labour & 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, State & Territory Governments.	Dimeo joined EcoVadis in 2021 – a global business assessment & rating platform that examines organisations' environmental, labour and human rights, ethics, and sustainable procurement practices.
In 2019 Dimeo became one of the first cleaning companies in Australia to receive a CAF 3 Star Certification (highest level). Dimeo has achieved CAF Certifications at 4 sites & is currently supporting Certifications for another 11 sites. See CAF Case Study overleaf.	Dimeo updates & maintains its details and Modern Slavery information in the PCA Modern Slavery Questionnaire.	Dimeo collaborates with & actively participates in training, initiatives, information sharing & auditing processes instigated by our clients who are conducting their own Modern Slavery due diligence of supply chains.	In FY2023, Dimeo's EcoVadis certification increased from Bronze Medal to Silver Medal, placing us in the top 25% of assessed companies across the EcoVadis database.
Dimeo working towards achieving CAF Pre-Qualification status in FY2024.			Dimeo working towards achieving EcoVadis Gold Medal level in FY2024.



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



### EMBEDDING INDUSTRY COLLABORATION & INITIATIVES

Dimeo's clients include large, eminent organisations such as the Australian Government, State and Territory Governments, ASX100 companies and Australia's leading property owners and managers. These large organisations are required to act and report on the requirements of the Australian Commonwealth **Modern Slavery Act 2018**.

As a key member of these organisation's Tier 1 supply chain, Dimeo participates in their Modern Slavery due diligence activities. In FY23 Dimeo participated in 23 separate client audits on OHSE compliance, wage compliance, and employee welfare. To date these assessments have not identified any instances of Modern Slavery in Dimeo's operations or supply chains.

Dimeo continues to participate in several collaborative, client-led Modern Slavery initiatives including working groups, workshops and presentations.

### Collaboration with Clients & other Businesses

Dimeo has successfully completed Modern Slavery supplier questionnaires, audits and consultations from over 25 clients including:

- ✓ **Cushman & Wakefield incorporating Westpac, BHP, BUPA, Suncorp.**
- ✓ **Jones Lang LaSalle (JLL) incorporating ANZ, Medibank Private.**
- ✓ **BGIS incorporating Virgin Australia, HBF Medical Services.**
- ✓ **Cbus Property, GPT Group, AMP Capital, Charter Hall, ISPT, CBRE, Commonwealth Bank of Australia (CBA), Brookfield, Investa.**

### CASE STUDY CLEANING ACCOUNTABILITY FRAMEWORK (CAF)

CAF's mission is to improve labour practices in the Australian cleaning industry. CAF works with cleaners, tenants, contractors, property owners, facility managers and investors across the cleaning supply chain to ensure ethical labour practices through promotion of decent work, ethical procurement and best practice.

In 2019 Dimeo became one of the first cleaning companies in Australia to achieve a CAF 3 Star Certification (highest level). Today, in collaboration with property owners and managers, Dimeo is proud to have achieved CAF Certification at four operations (listed below) and is supporting CAF Certifications for a further 10 sites with ISPT and one site with Cbus Property:

- **140 William Street, Perth WA** – Cbus Property, CBRE & Dimeo.
- **Liberty Place, Sydney NSW** – GPT Group / ISPT, JLL & Dimeo.
- **Angel Place, Sydney NSW** – AMP Capital, Dimeo.
- **333 George Street, Sydney NSW** – Charter Hall, CBRE & Dimeo.



THIS CERTIFICATE DEMONSTRATES THAT

**ANGEL PLACE  
123 PITT STREET, SYDNEY**

has been certified as compliant with the CAF 3 Star Standard\*

The Cleaning Accountability Framework (CAF) is a worker-driven social compliance scheme that advocates for improved labour standards. Achieving CAF Certification means the cleaners working at this building are being paid correctly, can exercise their workplace rights, and are involved in maintaining good labour standards and quality cleaning services.

Congratulations to the **Mirvac, Dimeo Cleaning Services**, and **the cleaners** at the site.

CERTIFICATION DATE: 18 DECEMBER 2020  
LAST ANNUAL HEALTH CHECK COMPLETED ON: 15 MAY 2023  
CERTIFICATION NO: 202002

\*Excludes tenant procured cleaning services.



## 5. 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 potential Modern Slavery Risks in our operations and supply chains.

### **INTERNAL MONITORING & REPORTING**

Modern Slavery Risk continues to be a formal part of 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 regularly monitors the progress of our Modern Slavery actions and approves the full-year Modern Slavery Statement.

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

During FY2022-2023 we formally defined Modern Slavery key performance indicators (KPIs) to help us consistently monitor, measure and report on our Modern Slavery progress. These KPIs include topic areas such as the number of suppliers who have been subject to due diligence, the number of staff trained on modern slavery, and the number of breaches of Modern Slavery identified in the business and the supply chain.

### **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 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, as discussed on page 17.



## 6. 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 Agreements 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 of 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.





## 7. Other relevant information



### NEXT STEPS IN DIMEO'S MODERN SLAVERY JOURNEY

During the FY2022-2023 period Dimeo embedded its processes for identifying potential Modern Slavery Risks in our operations and supply chains. As Dimeo's understanding of Modern Slavery has matured, our continuous improvement processes have enabled us to refine our Modern Slavery activities and develop processes and procedures that are better tailored to our business, our supply chain and our stakeholders.

**With focus on continuous improvement, in FY2023-2024 Dimeo plans to further strengthen our approach to Modern Slavery, including:**

- Embedding, measuring and reporting on our Modern Slavery key performance indicators, to monitor the effectiveness of our approach.
- Expanding our Modern Slavery assessment and due diligence of our high priority Tier 2 suppliers.
- Extending the Dimeo Modern Slavery Questionnaire directly to our high priority Tier 2 suppliers.
- Achieving the next Gold Medal level of EcoVadis accreditation, up from our current Silver Medal level.
- Developing relationships with not-for-profit organisations that can assist with enhancing our grievance and remediation policies and procedures. Eg Anti-Slavery Australia, Australian Red Cross.
- Introducing a dedicated section for Modern Slavery reporting and information on our refreshed Dimeo website.

Our progress in these areas will be reported in our FY2023-2024 Modern Slavery Statement.



Thank you



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