

DIMEO GROUP HOLDINGS PTY LTD

MODERN SLAVERY STATEMENT

FY2023-2024 REPORTING PERIOD

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

OCTOBER 2024 – BOARD APPROVED 22nd OCTOBER 2024



A photograph of two hands, one from a lighter-skinned person and one from a darker-skinned person, both holding a small amount of bright red soil. The hands are positioned one above the other, with a stream of soil falling from the upper hand into the lower one. The background is a blurred landscape of red earth and green trees under a blue sky.

DIMEO INDIGENOUS ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of country throughout Australia
and recognise their continuing connection to land, waters and culture.
We pay our respects to their Elders past, present and future.



Contents – Statement Annexure

The following pages of Dimeo Group Holdings Pty Limited’s FY2023-2024 Modern Slavery Statement address each of the mandatory criteria required in Section 16 of the **Australian Commonwealth *Modern Slavery Act 2018***.

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1. The Reporting Entity

- a. Principal Governing Body Approval
- b. 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

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.

a. PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement for FY2023-2024 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”), on 27th October 2024.

b. SIGNATURE OF RESPONSIBLE MEMBER

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

James Webber
Executive Director

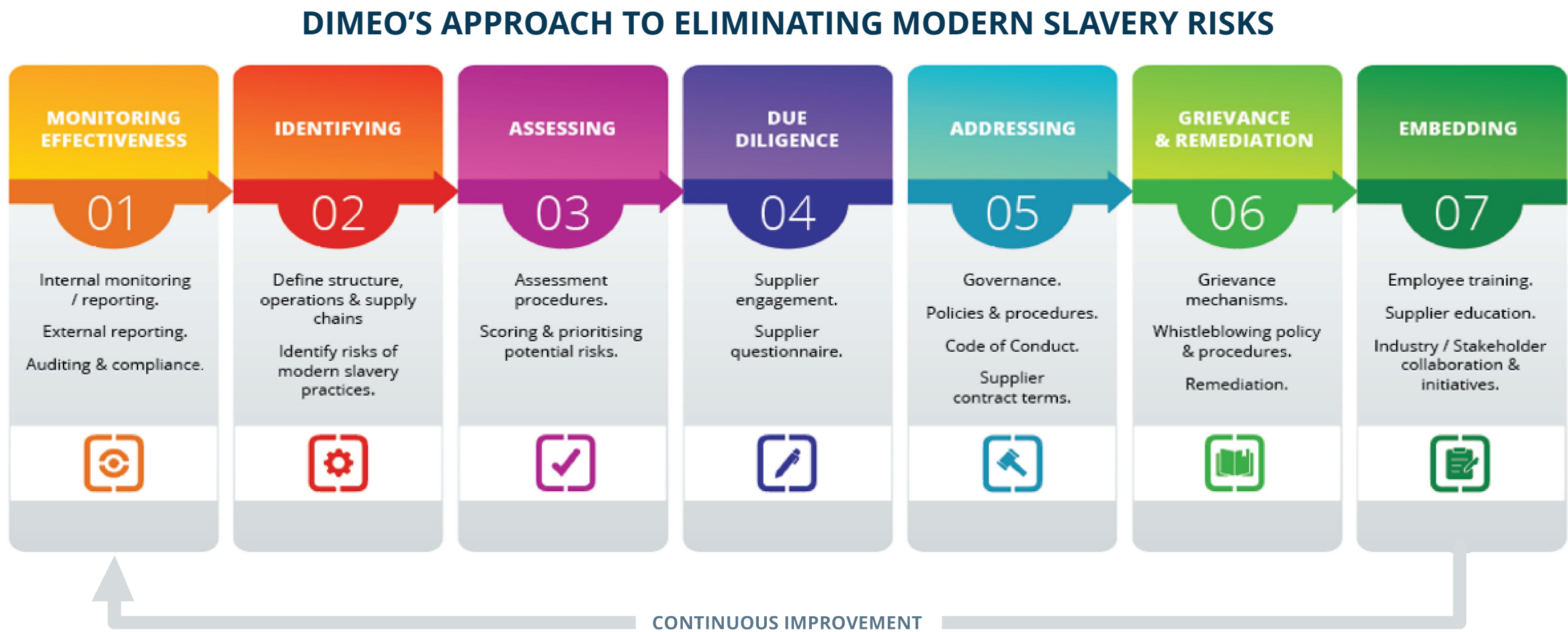


1. c. Dimeo's Approach

Dimeo Group Holdings Pty Ltd (Dimeo), is pleased to produce this Modern Slavery Statement for FY2023-2024, in accordance with the requirements of the Australian Commonwealth *Modern Slavery Act 2018*.

Our FY2023-2024 Modern Slavery Statement provides an overview of Dimeo's fifth 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.





1. c. 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's Modern Slavery Policy, Speak Up (Whistleblower) Policy, Diversity & Equal Opportunity Policy, Environmental Policy and OH&S Policy all available on the [Dimeo website](#). Other shared policies available on request from the website include but are not limited to the Grievance Policy, the Staff Code of Conduct and the Supplier Code of Conduct.



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 FY2023-2024 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 80% of Dimeo employees being of culturally and linguistically diverse backgrounds, and 48% of our employees identifying as women. Dimeo's staff satisfaction and retention rates are amongst the highest in the Australian cleaning sector.

During FY2023-2024 Dimeo experienced almost no impact from the Coronavirus (COVID19) pandemic of previous years, as our operations and growth trajectory returned to pre-COVID-19 levels.

Dimeo's operations require close co-operation 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.



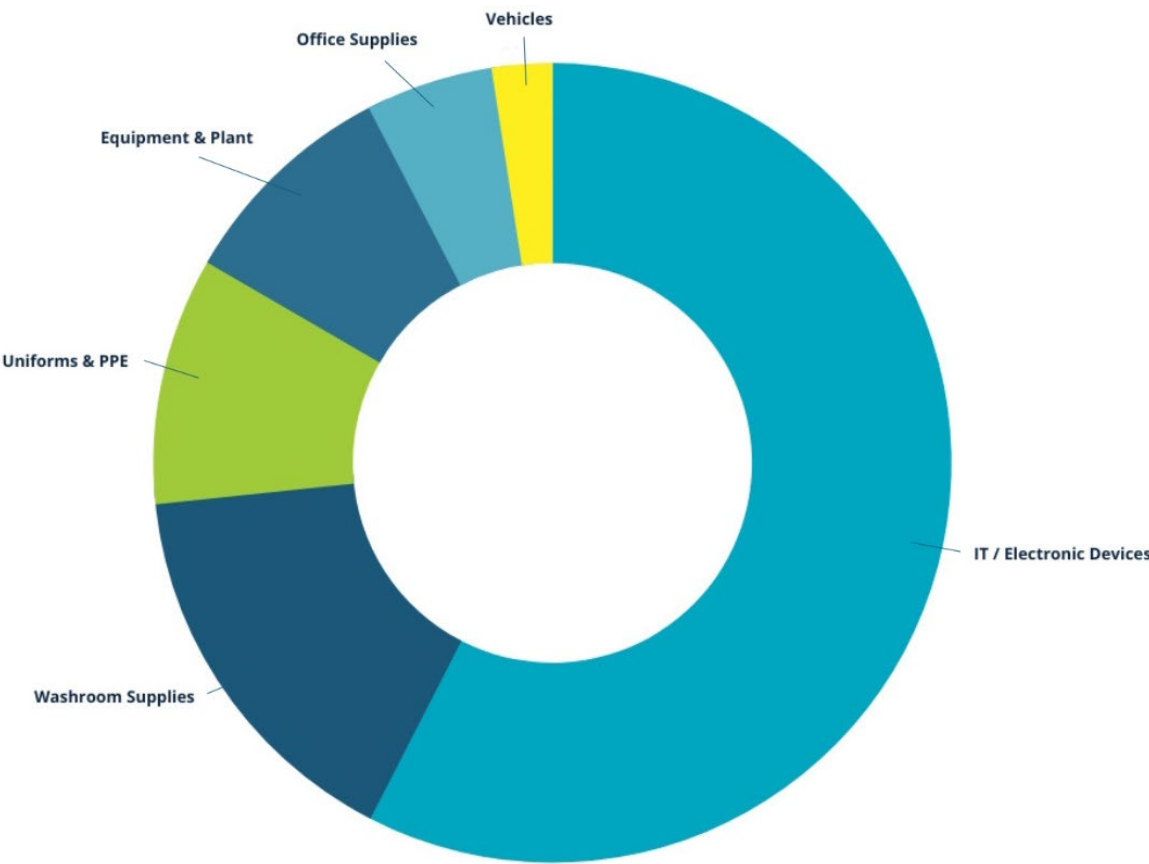
2. Structure, Operations & Supply Chains

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 to view, upon request.

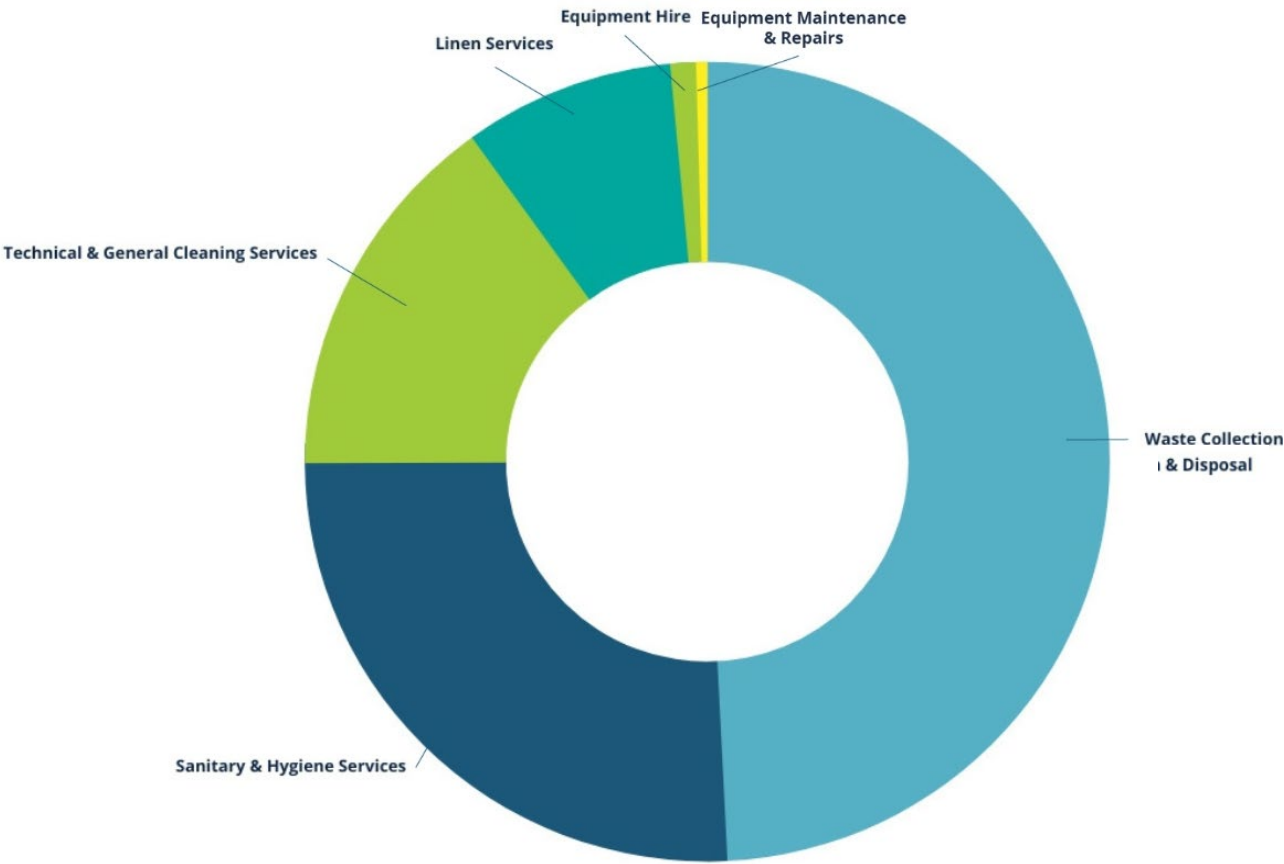
SUPPLIERS PRODUCTS

All Product suppliers Australian based companies.



SUPPLIERS SERVICES

All Services suppliers are Australian based companies.





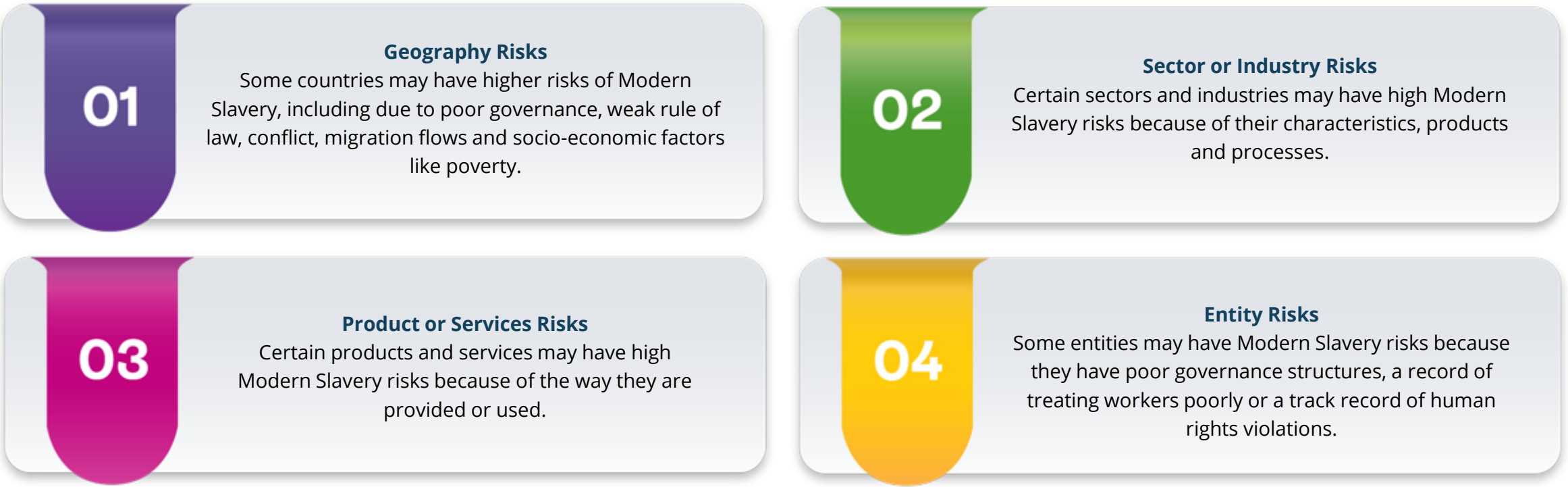
3. Risks of Modern Slavery Practices

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.





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 continues to demonstrate to our 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.





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 FY2023-2024 we enhanced our procedures for assessing our Tier 1 suppliers and their supply chains (that is, Dimeo's Tier 2 suppliers), as refined during the FY2022 and FY2023 reporting periods. Detail information is provided in Section 4.

DIMEO'S SUPPLY CHAINS PRODUCTS AND SERVICES

During the FY2023-2024 period our products and services supply chains remained very similar to those of FY2022 and FY2023. The COVID-19 impact on our supply chains that Dimeo experienced during FY2021 and FY2022 diminished to almost no impact during this FY2023-2024 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 are detailed in Section 4.





4. Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes

ACTIONS DIMEO TAKES TO ASSESS RISKS

During the FY2023-2024 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. This approach indicates a priority list of suppliers that may require more in-depth assessment and due diligence.

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 e.g. 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, e.g. 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.



4. Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes

DUE DILIGENCE SUPPLIER ENGAGEMENT

In FY2023-2024 Dimeo continued our program of communication and regular engagement with our supply chain to inform them about Dimeo's commitment to progressively eliminating Modern Slavery risks in our operations and supply chains. By raising awareness and building knowledge, we aim to empower our suppliers and their workforce to identify and respond to instances of potential Modern Slavery.

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 Supplier / Contractor Code of Conduct and Contractor Agreement, all including Modern Slavery.
- Dimeo's Speak Up (Whistleblower) Policy & Procedures, applying to our suppliers, contractors and their employees.
- All Tier 1 suppliers in all risk categories asked to complete our Dimeo Modern Slavery Questionnaire (see below).
- Selected high and medium-risk Tier 1 suppliers asked to complete our Dimeo Secondary 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.

Dimeo has also proactively shared informative reference materials to keep our suppliers up-to-date on Modern Slavery risks, including:

- Australian Government information resources on Modern Slavery.
- Fair Work wage compliance resources.
- Australian Red Cross downloadable materials about Modern Slavery.



4. Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes

DUE DILIGENCE DIMEO SUPPLIER QUESTIONNAIRES

During FY2023-2024, we again asked our Tier 1 suppliers to complete our Dimeo Modern Slavery Questionnaire. Additionally, our suppliers in the category of 'cleaning service partners' were also asked to complete a supplementary Secondary Modern Slavery Questionnaire.

Our Modern Slavery Questionnaires include simple and enlightening questions, carefully designed and tailored to the nuances of our industry. Importantly our Questionnaires ask our Tier 1 suppliers to:

- Provide information about their potential high-risk Tier 1 suppliers (that is, Dimeo's Tier 2 suppliers); and
- Confirm their adherence to Dimeo's Supplier/Contractor Code of Conduct which explicitly includes Modern Slavery risks (see overleaf).

During FY2023-2024, over 120 Dimeo suppliers completed our Dimeo Modern Slavery Questionnaire. Our suppliers' responses have provided important information for our risk assessment and due diligence, helping us identify where Modern Slavery risks might exist and priority areas for ongoing and further assessment in our Tier 1 and Tier 2 supply chain, including via our Secondary Modern Slavery Questionnaire.

Dimeo Secondary Modern Slavery Questionnaire: During FY2023-2024, Dimeo introduced a Secondary Modern Slavery Questionnaire for our Tier 1 suppliers of cleaning services, which included additional questions about their operations, specifically in human resource management.

Our Secondary Modern Slavery Questionnaire is designed to further clarify any potential Modern Slavery risks in our cleaning service partners' operations and to help us better understand their operational circumstances and procedures. The Secondary Questionnaire provides us with information and transparency to identify any of our service partners that might have higher-risk operational practices, so we can work with them to mitigate Modern Slavery risks in their operations, and to adhere to Dimeo's Modern Slavery and other Policies.

During FY2023-2024, 52 Dimeo suppliers responded to our Secondary Modern Slavery Questionnaire. Responses showed that:

- No instances of Modern Slavery or wage underpayments were reported.
- 9% of our suppliers are themselves required to report under the **Modern Slavery Act 2018 (Cth)**.
- 100% of our suppliers who hire migrant workers have procedures in place for work visa verification by sighting and recording visa details.
- 76% of suppliers have taken formal steps to audit their Tier 1 suppliers (that is, Dimeo's Tier 2 suppliers).



4. Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes

ACTIONS DIMEO TAKES TO ADDRESS RISKS

During the FY2023-2024 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, incl. remediation – revised and updated FY24.	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">• Speak Up (Whistleblower) Policy – revised and updated FY24.• Grievance Policy.	Dimeo employee Induction explicitly includes sections on the Speak Up (Whistleblower) and Grievance policies.	‘Corporate Contractor Agreement’ forbids Modern Slavery, as defined in Modern Slavery Act 2018 (Cth) .	
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

Grievance processes, including for Modern Slavery, are integrated into Dimeo's policies and procedures, which are available via our 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 phoneline, Rehab Options, which specifically includes management of concerns relating to Modern Slavery.

Updated Modern Slavery Policy: During FY2023-2024, Dimeo fully revised and updated our Modern Slavery Policy and procedures to detail: Modern Slavery and its indicators as Disclosable Matters under our Speak Up (Whistleblower) Policy; how to report concerns; investigation; and remediation.

Updated Speak Up (Whistleblower) Policy: During FY2023-2024, Dimeo fully revised and updated our Speak Up (Whistleblower) Policy and procedures, explicitly including the provision of effective grievance mechanisms for all our stakeholders in line with the UN Guiding Principles. This ensures our mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

Direct Worker Consultation: Dimeo also 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 overleaf).

REMEDATION PROCESSES

Dimeo endorses the UN Guiding Principle's approach to remediation of adverse human rights impacts. Our Modern Slavery Policy, Speak Up (Whistleblower) Policy and Grievance Policy detail the remediation processes if an incidence of Modern Slavery is suspected, or a concern is reported.

Fortunately, during the FY2023-2024 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-survivor. Dimeo will work towards remediating the adverse impact by restoring the victim-survivor 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.

Where appropriate, Dimeo will proactively provide holistic supports for victim-survivors of Modern Slavery in our operations or supply chains. Dimeo will support them to access services such as professional counselling and specialist care through programs such as the Salvation Army's *Trafficking and Slavery Safe House* or Australian Red Cross' *Support for Trafficked People Program*.



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: Our company-wide online employee induction tool, EdApp, is an easy-to-understand portal that includes our Modern Slavery, Speak Up (Whistleblower) and Grievance Policies; Dimeo Code of Conduct; information from Fair Work Australia and United Voice (the cleaning industry's primary Trade Union). EdApp provides accurate reporting of staff induction completion rates, showing that in the FY2023-2024 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 are re-inducted annually in our Modern Slavery, Speak Up (Whistleblower) and Grievance eLearning modules via EdApp. All training is systematically documented as part of our Quality Management System ISO9001 requirements. In FY2023-2024, Dimeo created an EdApp eLearning course on identifying the signs of Modern Slavery, specifically for Dimeo Operations Managers who manage cleaners in the workplace. Our frontline employees and supervisors participated in the Modern Slavery 'ToolBox Talk' presentation. Office-based employees (including our Board, Executive leaders, HR, procurement, finance and shared services teams) also completed annual compliance training including Modern Slavery via EdApp.

Dimeo's site-specific Work Health & Safety (WH&S) Management Plans continue to include our 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.

Visible Display of Policies and Modern Slavery Posters: To further raise staff awareness of Modern Slavery, Dimeo continues to distribute to all Dimeo operating locations copies of our Modern Slavery Policy, Speak Up (Whistleblower) Policy and Grievance Policy and adapted Australian Red Cross Modern Slavery educational posters for display on staff notice boards/in cleaners' rooms.





4. Actions Taken to Assess & Address Risks, including Due Diligence & Remediation Processes



EMBEDDING SUPPLIER EDUCATION

In FY2023-2024, 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 above. In FY2023-2024 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 FY2023-2024, 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.	PCA key members maintain an industry-wide 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 10 sites & is currently supporting Certifications for another 4 sites. See CAF Case Study overleaf.	Dimeo updates & maintains its details and Modern Slavery information in the PCA Modern Slavery Questionnaire, at least annually.	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 achieved EcoVadis Silver Medal accreditation, placing us in the top 25% of assessed companies across the EcoVadis database. During FY2024 we continued to work towards EcoVadis Gold Medal rating.
Dimeo working towards achieving CAF Pre-Qualification status in FY25.			Dimeo working to achieve EcoVadis Gold Medal rating in FY2025.





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 leading property owners and managers. These large organisations are themselves required to report on the requirements of the *Modern Slavery Act 2018*.

As a key member of these organisations’ Tier 1 supply chain, Dimeo participates in their Modern Slavery due diligence activities. In FY2024 Dimeo participated in over 25 separate client questionnaires, consultations and audits on Modern Slavery, WHS compliance, wage compliance, and employee welfare. To date these assessments have identified no 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. Dimeo utilises these opportunities to better understand: the local/ international Modern Slavery landscape; the expectations of our clients; and to assess the impact of Dimeo’s Modern Slavery measures relative to other stakeholders.

Collaboration with Clients & other Businesses

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

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



CASE STUDY CLEANING ACCOUNTABILITY FRAMEWORK (CAF)

CAF exists to improve labour practices in the Australian cleaning industry by working with cleaners, tenants, contractors, property owners, facility managers and investors to ensure ethical labour practices through 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).

In FY2024, in collaboration with property owners/managers, Dimeo increased our number of CAF Certified operations from four to 10 (listed below), and have supported another 4 CAF Certification applications which are ongoing:

- **100 St Georges Terrace & Enex, Perth WA** – ISPT, CBRE & Dimeo.
- **Lakelands Shopping Centre, Perth WA** – ISPT, CBRE & Dimeo.
- **Central Plaza, Brisbane QLD** – ISPT, CBRE & Dimeo.
- **1 William Street, Brisbane QLD** – ISPT, JLL & Dimeo.
- **140 William Street, Perth WA** – Cbus Property, CBRE & Dimeo.
- **Liberty Place, Sydney NSW** – GPT Group / ISPT, JLL & Dimeo.
- **100 Pacific Highway, Sydney NSW** – ISPT, CBRE & Dimeo.
- **George Place, Sydney NSW** – GPT Group / ISPT, JLL & Dimeo.
- **Angel Place, Sydney NSW** – Mirvac, Dimeo.
- **333 George Street, Sydney NSW** – Charter Hall, CBRE & Dimeo.



5. How we Assess the Effectiveness of the 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 KPIs and approves the full-year Modern Slavery Statement.

FY20203-2024 saw the second year of internal reporting on our defined Modern Slavery key performance indicators (KPIs). These KPIs include topic areas such as the number of suppliers who have undergone due diligence, the number of staff trained on Modern Slavery, and the number of breaches of Modern Slavery identified in our operations and supply chain. Our Dimeo Compliance Manager utilises these KPIs to help consistently monitor, measure and report on our Modern Slavery progress, including to the Board.

To further strengthen our internal monitoring and reporting processes, Dimeo's appointed Whistleblower Protection Officer (WPO) / The Dimeo Compliance Officer is also an Executive Director of the company. He is responsible for our Speak Up (Whistleblower) Policy, Modern Slavery Policy and Grievance Policy, which all incorporate Modern Slavery and its indicators as Disclosable Matters under our Speak Up (Whistleblower) Policy.

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 periodically 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 18.



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, Speak Up (Whistleblower) Policy and Grievance 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.



7. Other Relevant Information

NEXT STEPS IN DIMEO'S MODERN SLAVERY JOURNEY

During the FY2023-2024 period Dimeo further embedded its processes for identifying potential Modern Slavery risks in our operations and supply chains. Dimeo's 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, our stakeholders and the nuances of our industry.

With focus on continuous improvement, in FY2024-2025 Dimeo plans to further strengthen our approach to Modern Slavery, including:

- Tracking our Modern Slavery key performance indicators, to monitor the effectiveness of our approach.
- Rolling-out our revised and updated Dimeo Speak Up (Whistleblower) and Modern Slavery Policies.
- Expanding our Modern Slavery assessment and due diligence of our high priority Tier 2 suppliers, including extending our Modern Slavery Questionnaire directly to this group.
- Embedding our Secondary Modern Slavery Questionnaire for our Tier 1 suppliers - cleaning service partners.
- Maintaining and increasing the high rate of return of both our Modern Slavery Questionnaires.
- Updating our EdApp Modern Slavery eLearning module for all employees.
- Updating our Supplier Code of Conduct to reflect improvements to the existing compliance procedures.
- 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.

Our progress in these areas will be reported in our FY2024-2025 Modern Slavery Statement.





DIMEO
CLEANING EXCELLENCE



DIMEO
INDIGENOUS

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