



DIMEO

DIMEO GROUP HOLDINGS PTY LTD  
MODERN SLAVERY STATEMENT

NOVEMBER 2022 – BOARD APPROVED 24/11/2022  
FOR THE AUSTRALIAN COMMONWEALTH MODERN SLAVERY ACT 2018 FY2021-2022 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 24th November 2022, this Modern Slavery Statement for FY2021-2022 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").

## 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

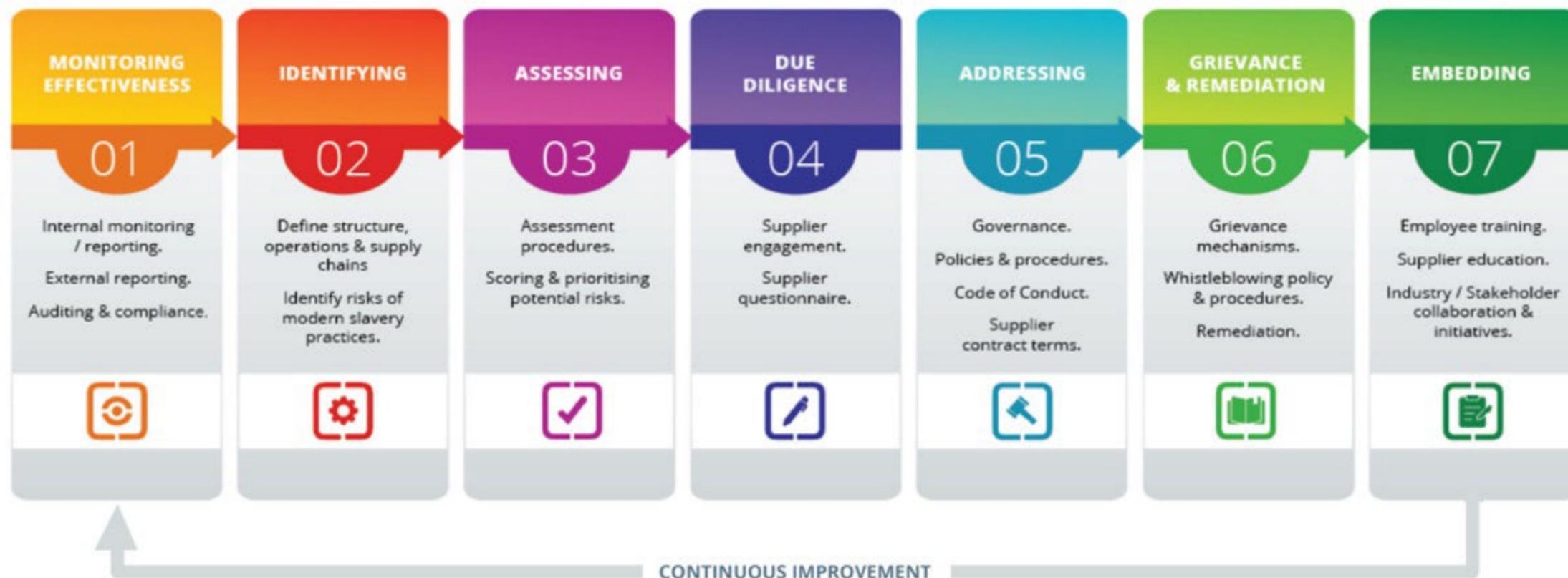


Dimeo Group Holdings Pty Ltd (Dimeo), is pleased to produce this Modern Slavery Statement for FY2021-2022, in accordance with the requirements of the Australian Commonwealth **Modern Slavery Act 2018**.

Our FY2021-2022 Modern Slavery Statement provides an overview of Dimeo's third year of activities in eliminating Modern Slavery Risks in our operations and supply chains, as 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





# 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.

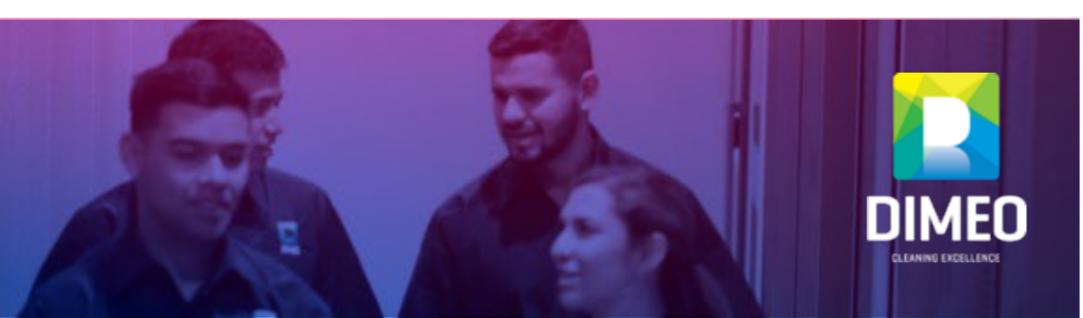
Dimeo continues to acknowledge our responsibility under the [UN Guiding Principles on Business & Human Rights](#) (UN Guiding Principles) to respect human rights in all our business activities. We understand that this includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery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





# 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.

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](#).



# 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, 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 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 independent audits.

**During FY2021-2022 Dimeo employed approximately 3,500 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 FY2021-2022 the coronavirus (COVID-19) pandemic 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 improve hygiene levels in their premises; and decreases when clients minimised usage of their premises as workers chose to work from home.

In 2022, Australia's 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, now have a greater range of entry-level jobs available to them. Notwithstanding, we remain alert to the risk that COVID-19 could increase the vulnerability of our employees and the workers in our supply chains to Modern Slavery.

Dimeo's operations require close cooperation with our supply chain, and we work hard to maintain 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 suppliers provide us with a range of cleaning products and equipment, as detailed overleaf.



# Structure, Operations & Supply Chains



## DIMEO'S SUPPLY CHAINS

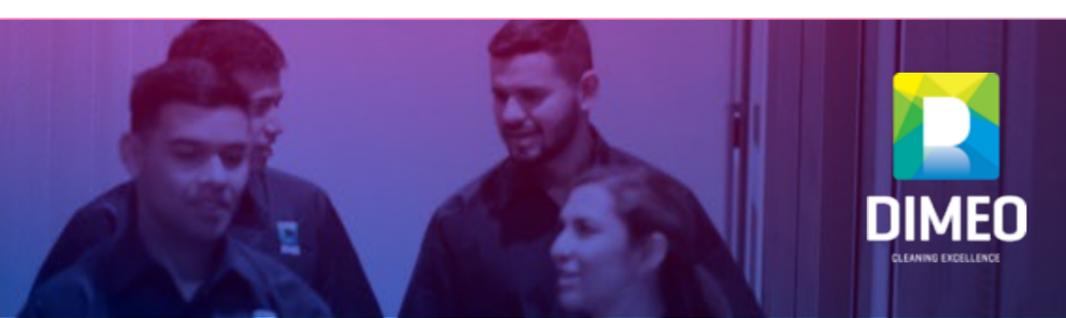
Dimeo's supply chains are built on long-term relationships with reputable Australian based businesses. Dimeo has approximately 200 entities that are direct Tier 1 suppliers of products and services to our business. Our top 25 Tier 1 suppliers consistently comprise approximately 85% of our overall Annual supplier spend. Dimeo's supplier list is available for perusal upon request.

<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 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, as defined by the UN Guiding Principles.

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

Dimeo undertakes an annual scoping exercise to examine areas in our operations and supply chains that may involve risks of Modern Slavery practices. By considering geographic risks, sector / industry risk, product / services risks and entity risks, we developed a sound understating of 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 our 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 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 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 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 periods, we found that our continuous improvement approach to eliminating Modern Slavery Risks (detailed on page 3) 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, Dimeo also examined our suppliers of products and services to identify potential risks of Modern Slavery practices in our supply chains. In FY2021-2022 we refined our procedures for assessing our Tier 1 suppliers and their supply chains (that is, Dimeo's Tier 2 suppliers). Our updated procedures for assessment and due diligence related to our suppliers is detailed in Section 4.

In previous reporting periods COVID-19 disruptions had delayed Dimeo's activities in assessing potential risks of Modern Slavery amongst our Tier 2 suppliers of products and services. Positively, in FY2021-2022 we were able to begin to embed these activities, as 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 FY2021-2022 reporting period we refined 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 continues to provide us with a step-by-step method for assessing our 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. 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, 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.

## 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 FY2021-2022 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 high priority 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 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. Our Dimeo Modern Slavery Questionnaire for suppliers comprises sixteen simple and informative questions. Positively, in FY2021-2022 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 priority 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 FY2021-22 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 online 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 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 <i>Modern Slavery Act 2018</i> (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 staff to complete Dimeo's new online induction modules.		



# 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 phoneline, which specifically includes management of concerns relating to Modern Slavery.

During FY2021-2022, 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 applies 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.

## REMEDIATION PROCESS

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 that we follow if an incidence of Modern Slavery is suspected or a concern is reported.

Fortunately, during the FY2021-2022 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 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

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.

In FY2021-2022 Dimeo developed an online employee induction tool to streamline our induction of new staff and provide more accurate reporting of staff induction completion rates. The new online tool 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). Dimeo's new online induction tool will be launched on 1 July 2022 and rolled out to all existing and any new Dimeo staff, ensuring that all employees are aware of Dimeo's Modern Slavery Policy and related information.

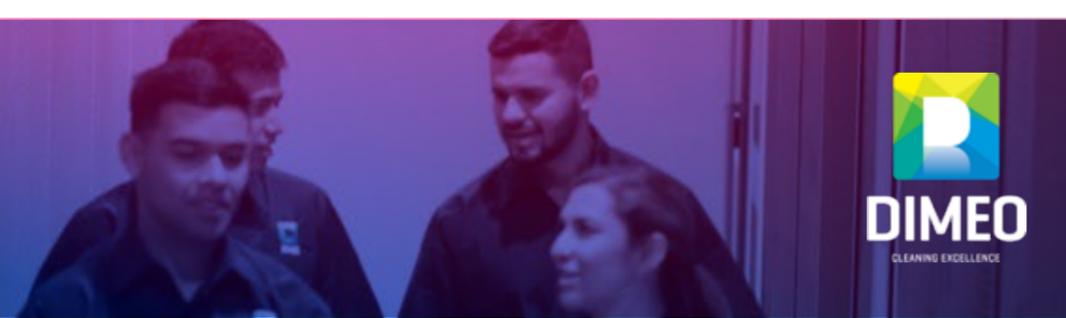
Dimeo employees also participate in regular compliance training relating to company policies, including Modern Slavery. All training is systematically documented as part of our Quality Management System ISO9001 requirements. In FY2021-2022, Dimeo continued our company-wide training about our Modern Slavery Policy for all employees, with frontline employees, supervisors, managers and office-based employees all participating in the Modern Slavery 'Tool Box 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 (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 compliance.

In FY2021-2022, to further raise staff awareness of Modern Slavery, Dimeo adapted Australian Red Cross' Modern Slavery educational posters and distributed them to around 300 Dimeo operating locations across Australia for display on staff notice boards.



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



## EMBEDDING SUPPLIER EDUCATION

In FY2021-2022, Dimeo expanded 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 14. In FY2021-2022 we introduced a procedure to raise and discuss the importance of Modern Slavery with our existing suppliers when their contracts are periodically reviewed.

## EMBEDDING INDUSTRY COLLABORATION & INITIATIVES

Dimeo has been an advocate for positive change in the Australian cleaning industry for many years. In FY2021-2022, 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	EcoVadis
Dimeo is an active 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 joined EcoVadis in 2021 – a global business assessment and 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 at the time). As at June 2022, Dimeo had achieved CAF Certifications at four operations. See Case Study overleaf	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.	As at June 2022, Dimeo's EcoVadis data had been assessed by several key clients including The Australian Stock Exchange (ASX) and CBRE.



# 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 organisations' Tier 1 supply chain, Dimeo participates in their Modern Slavery due diligence activities. 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.

## CASE STUDY CLEANING ACCOUNTABILITY FRAMEWORK (CAF)

The Cleaning Accountability Framework's (CAF) 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 our promotion of decent work, ethical procurement and best practice.

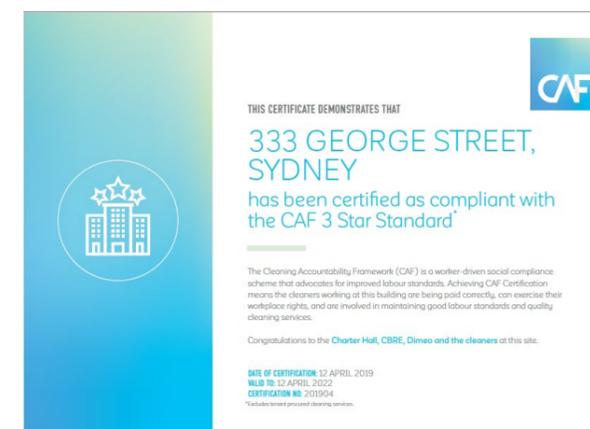
In 2019 Dimeo became one of the first cleaning companies in Australia to achieve a CAF 3 Star Certification (highest level). Today, in collaboration with property owners and managers, Dimeo is proud to have achieved CAF Certification at four operations:

- **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.

### Collaboration with Clients & other Businesses

Dimeo successfully completed Modern Slavery supplier questionnaires from over 25 clients including but not limited to:

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





# 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 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 FY2021-2022 we formally defined Modern Slavery key performance indicators (KPIs) to help us consistently monitor, measure and report on our Modern Slavery progress.

## EXTERNAL REPORTING

Dimeo's Modern Slavery Statements are publicly available on [Australian Border Force's Online Register of Modern Slavery Statements](#).

In FY2021-2022, 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, our website refresh was delayed, and plans are now in place for this activity to take place in FY2022-2023.

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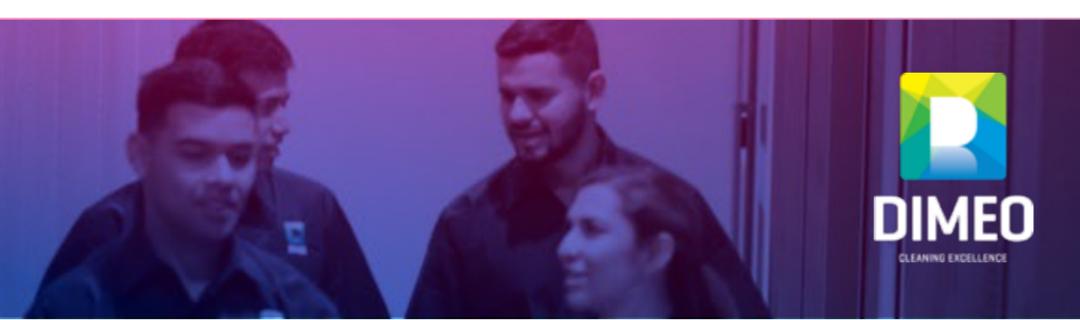
## AUDITING & COMPLIANCE

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, as discussed on page 19.



# 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 FY2021-2022 Dimeo made significant progress in our approach to eliminating 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 FY2022-2023 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 identification, assessment and due diligence in our high priority Tier 2 suppliers.
- Extending the Dimeo Modern Slavery Questionnaire to our high priority Tier 2 suppliers.
- 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.
- 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 FY2022-2023 Modern Slavery Statement.



Thank you



**DIMEO**  
CLEANING EXCELLENCE

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