



# Precise Air Group Modern Slavery Statement 2025

## 1. Introduction

Modern slavery encompasses serious human rights violations including human trafficking, slavery, servitude, forced labour, forced or servile marriage, child exploitation, and debt bondage. We acknowledge our corporate responsibility to identify, assess, and mitigate modern slavery risks across our operations and supply chains.

Precise Air Group Holdings Pty Limited and all of its subsidiaries (“Precise Air Group”) have a corporate responsibility to take an active role to address and mitigate potential modern slavery risks.

We reaffirm our commitment to ethical business conduct and will not knowingly engage with any entity involved in modern slavery practices.

This statement is made pursuant to the Australian Modern Slavery Act 2018 (as amended in 2024) and reflects our compliance with the expanded mandatory reporting criteria and governance expectations.

## 2. About our company

### Structure

Precise Air Group Holdings Pty Limited is a company registered in Australia with the following wholly owned subsidiaries:

- Precise Air Group Pty Ltd
- Precise Fire Pty Ltd
- Airgene Pty Ltd
- Precise Air Group Labour Pty Ltd
- Precise Air Group NSW Pty Ltd
- Precise Air Group QLD Pty Ltd
- Precise Air Group Contracting Pty Ltd

In 2018, Precise Air Group was acquired by Fujitsu General Limited, a Japanese company listed on the Tokyo Stock Exchange. No change to our corporate structure has occurred since the acquisition.

The entities formed a working group by engaging and consulting with the relevant stakeholders to

understand the various operations and supply chain risks.

## Operations

Commencing in 2002, the Precise Air Group provides services across Australia and employs approximately 450 staff.

Precise Air Group provides HVAC servicing, maintenance and installation, building optimisation solutions, fire suppression design, systems, service, installation and maintenance, HVAC hygiene and remediation, duct and kitchen exhaust cleaning services and maintenance.

All services are provided across commercial, retail, transport, infrastructure, education, government, health and aged care and entertainment venues throughout Australia in all states and territories.

## Supply Chains

Precise Air Group relies on both subcontracted labour and the procurement of equipment, parts, accessories and tools.

Nationally, our subcontracted labour hire is made up of 843 active entities, calculated from our subcontractor compliance platform in March 2025. During the reporting period, we engaged 176 new subcontractors, who all completed the prequalification process which captures modern slavery adherence.

Precise Air Group has 1,587 suppliers nationally with 375 joining during the current reporting period. The suppliers providing equipment, parts, accessories and tools.

While the majority of our suppliers are Australian-based, we recognise that many products and parts in the HVAC and fire safety industry originate from overseas, including regions identified as high risk for modern slavery. We are working to trace and assess these supply chains more thoroughly.

### 3. Risks of modern slavery practices

As a national service provider, Precise Air Group will continue to consciously consider how our activities and our supply chains could be linked to modern slavery practices.

We acknowledge the government's identification of high-risk regions and products and will incorporate these into our future risk assessments.

Category	Risk Level	Key Controls
Employees	Negligible	Governed by Australian labour laws; induction includes modern slavery awareness; Employee Handbook reinforces ethics and non-discrimination.
Subcontractors	Low	Australian-based entities; strict prequalification checks; compliance audits; new Code of Conduct implemented in 2024–2025 reporting period.
Suppliers	Moderate	Geographical traceability of products and equipment supply chain, risks in IT, cleaning, and imported goods; supplier declarations required; traceability challenges remain.

We have identified heightened risks in imported HVAC components, electronics/IT systems, cleaning services, and PPE/uniforms. These sectors are globally recognised for higher vulnerability to exploitative practices, and we will focus monitoring and engagement in these areas.

#### 4. Initiatives and Achievements

During the reporting period, the company has focused on the following initiatives with an update on actions taken to mitigate modern slavery risks outlined.

- 92% of existing employees to receive and complete Compliance training which includes Diversity, human trafficking, modern slavery, human rights and Whistleblowing.

Achievement: We recorded an 89% completion rate for employee compliance training, ensuring staff across all business units were educated on diversity, human trafficking, modern slavery, human rights, and whistleblowing.

- Appointment of a Head of ESG dedicated as a senior member of staff primary sole function to deliver strategy and operational aspects of ESG across the group including modern slavery issues.

Achievement: We introduced as part of an internal appointment, a Head of ESG dedicated as a senior member to deliver strategy and operational aspects of ESG across the group.

- Development of the objectives of the ESG committee for the year, with regard to management of modern slavery risks.

Achievement: The ESG Committee established clear objectives directly aligned to modern slavery risk mitigation, driving structured supplier engagement, enhanced reporting, and improved governance processes. These objectives are monitored and managed via the working group. These objectives focus on monitoring progress towards modern slavery prevention goals and targets on an ongoing basis and regular audits to assess compliance with modern slavery policies and procedures.

- Develop and launch a Code of Conduct for subcontractors.

Achievement: Subcontractor Code of Conduct was implemented, requiring explicit acknowledgement of modern slavery obligations and strengthening compliance throughout our supply chain.

Precise Air Group has also established a confidential grievance mechanism and whistleblower channel that allows employees, subcontractors, and suppliers to raise concerns regarding potential modern slavery practices. Where risks are identified, we follow a remediation framework aligned with the guiding principles on business & Human Rights to ensure appropriate and ethical resolution.

For the next reporting year, we will continue to use key performance indicators to measure how effective we have been in combating slavery and human trafficking in our business and supply chains.

The actions and associated KPI's we will use in the next reporting year to measure our success are:

- By 31 March 2026, we will continue to build internal capability by rolling out mandatory modern slavery training for all employees, with tailored modules for high-risk roles which as procurement, operations, and People & Culture team with the aim to achieve at least 92% of existing employees will have received and completed compliance training.
- Develop and formally launch an Environmental, Social, and Governance (ESG) Policy approved by the Board, that outlines the groups commitment to sustainability, ethical business practices, diversity and inclusion, modern slavery prevention, human rights, and governance accountability.
- We will conduct an annual review of all sales proposal templates and standard documentation to ensure they align with current modern slavery legislation, regulatory expectations, and internal ethical sourcing commitments. Where gaps are identified, proposals will be updated to include explicit references to our stance on modern slavery, supplier obligations, and ethical procurement standards. This initiative will ensure that our external communications reflect our commitment to human rights, and that potential clients are informed of our proactive approach to mitigating modern slavery risks in our operations and supply chains.
- Conduct a comprehensive review of all active subcontractors to identify any that have not yet received or acknowledged the Subcontractor Code of Conduct since its implementation. This review will ensure complete distribution of the Code across the supply chain and highlight any gaps requiring immediate remediation.
- We will conduct an annual review of key governance policies, including the Code of Conduct, Supplier Code of Conduct, Whistleblower Policy, and Procurement Policy, to ensure they explicitly address modern slavery risks and align with evolving best practice.

In addition to training completion rates, we will track the percentage of subcontractors and suppliers who have formally acknowledged our Code of Conduct, the number of supplier audits conducted annually, and any identified risks remediated. These measures will allow us to assess effectiveness in a quantifiable and transparent manner.

## 5. Consultation

This statement has been developed through consultation with all wholly owned subsidiaries of Precise Air Group, including engagement with our ESG Committee, operational leadership teams, and the Fujitsu General Limited parent company. Employee representatives and procurement teams were also consulted to ensure alignment across functions and jurisdictions.

## 6. Conclusion

In keeping with our commitment to ethical operations and continuous improvement, we will continue to closely monitor legislative developments and emerging best practice in addressing modern slavery risks. As part of our ongoing improvement journey, we will adapt our policies, training, and supplier engagement processes to align with evolving standards. Through these actions, we reaffirm our responsibility to uphold human rights, strengthen transparency across our operations and supply chains, and contribute to the global effort to eliminate modern slavery.

This statement is made pursuant to the Australian Modern Slavery Act 2018 (as amended) for the reporting year ending March 2025 and has been approved by the Board.

**Approved By**

Nadeem Tayar

**Director & Chief Executive Officer**

Precise Air Group Holdings Pty Ltd