

General Australia Modern Slavery Statement



Publication Date: 01 June 2026

Financial Year Represented: 1 April 2025 - 31 December 2025[^]

[^] Change in financial year from April to March to January to December effective 31 December 2025

1. Authorisation

This Modern Slavery Statement was approved by the Board of Directors of General HVAC Solutions Australia Pty Ltd (General Australia, formerly Fujitsu General (Aust.) Pty Limited) on 27 May 2026, in their capacity as the principal governing body of the reporting entity, on behalf of General HVAC Solutions Australia Pty Ltd and all reporting entities covered by this statement.

This statement covers the transitional reporting period of 1 April 2025 to 31 December 2025 (nine months). This shortened period reflects the alignment of our financial reporting cycle from the Japanese fiscal year (April to March) to the Calendar Year (January to December) following the acquisition of our former parent company, Fujitsu General Limited, by Paloma Rheem Holdings Co., Ltd. in August 2025.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and is informed by the recommendations of the Australian Anti-Slavery Commissioner's Initial Position Paper (January 2026) on mandatory risk-based due diligence.

Signed by the Board of General HVAC Solutions Australia Pty Ltd:



[Philip Perham \(May 27, 2026 13:30:41 GMT+10\)](#)

Philip Perham

Chairperson

General HVAC Solutions Australia Pty Ltd

Dated: 27 / 05 / 2026



[Sachio Inami \(May 27, 2026 08:56:21 GMT+8\)](#)

Sachio Inami

Director

General HVAC Solutions Australia Pty Ltd

Dated: 27 / 05 / 2026

2. Introduction

General Australia (formerly Fujitsu General Australia, or FGA) presents this Modern Slavery Statement for the transitional reporting period of 1 April 2025 to 31 December 2025. This is our seventh statement under the Modern Slavery Act 2018 (Cth), and the first prepared following the acquisition of our former parent company by Paloma Rheem Holdings Co., Ltd.

This statement marks a deliberate evolution in our approach. We are moving beyond transparency reporting towards mandatory, risk-based due diligence, consistent with the direction set by the Australian Anti-Slavery Commissioner's Initial Position Paper (January 2026) and the Commissioner's Strategic Plan 2025 to 2028. We recognise that meaningful action, not merely disclosure, is what reduces the risk of harm to people in our operations and supply chains.

During this transitional period, our business underwent a significant corporate restructure. In August 2025, Fujitsu General Limited (FGL) was acquired by Paloma Rheem Holdings Co., Ltd. and subsequently delisted from the Tokyo Stock Exchange. As of 1 January 2026, General Australia operates as a wholly owned subsidiary of General Inc. Japan, under the ultimate holding company Paloma Rheem Holdings Co., Ltd. Importantly, the personnel responsible for human rights governance, sustainability due diligence, and modern slavery compliance within the former FGL transitioned into the same roles within General Inc. Japan. This personnel continuity ensured that our supply chain oversight and risk management programmes were not disrupted by the change of corporate ownership. The welfare of workers in our value chain remained a non-negotiable priority.

This statement provides a transparent account of our structure, operations, supply chains, identified risks, the specific actions we have taken, and how we measure our effectiveness. It reflects our commitment to placing people at the heart of our business decisions.



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3. Reporting Entity

The reporting entity covered in this statement is **GENERAL HVAC SOLUTIONS AUSTRALIA PTY LTD** (ABN 55 001 229 554), headquartered at 1 Telopea Place, Eastern Creek NSW 2766.

The entity's name change from Fujitsu General (Aust.) Pty Limited to General HVAC Solutions Australia Pty Ltd was registered with ASIC on 18 December 2025, reflecting the new corporate identity under the Paloma Rheem Holdings group.

4. Our Structure

General Australia is a wholly owned subsidiary within the Paloma Rheem Holdings group. The corporate restructure that took effect during December 2025 - January 2026 established the following ownership hierarchy:

Entity	Country	Relationship	ABN / Identifier	Ownership
Paloma Rheem Holdings Co., Ltd. (PRH)	Japan	Ultimate holding company		
GENERAL Inc. (GNL)	Japan	Parent Company of GAU	60 200 0106 6941	100%
General HVAC Solutions Australia Pty Ltd (GAU)	Australia	Reporting Entity, Subsidiary of GNL	55 001 229 554	100%
General HVAC Solutions New Zealand Limited (GNZ)	New Zealand	Subsidiary of GAU	9429 040 786 070	100%

Continuity of Governance: The personnel responsible for modern slavery compliance, sustainability due diligence, and human rights governance at the former Fujitsu General Limited are the same team now performing those functions within General Inc. Japan. This personnel continuity meant that the expertise, institutional knowledge, and active due diligence programmes carried through the corporate transition without disruption.

General Australia is integrating its modern slavery and human rights governance with the broader sustainability framework of the Paloma Rheem Holdings group. As this integration matures, we will report on the alignment of our due diligence processes with the group's global sustainability standards.



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5. Our Operations

General Australia is the exclusive importer and distributor of Fujitsu and General Airstage branded air conditioning products in Australia, leveraging over 60 years of advanced HVAC design and development expertise. We operate nationwide with offices in Sydney (head office), Brisbane, Melbourne, Adelaide, and Perth, employing approximately 165 people across our sales, service, and corporate functions.

Our core operations encompass:

- **Importation:** Importing finished HVAC systems and spare parts from manufacturing facilities in Thailand and China, along with OEM products from partners with production facilities in Italy, Malaysia, and China.
- **Distribution:** Utilising third-party transport and warehousing services nationwide, except for our own warehouse in Sydney, adjacent to our Eastern Creek headquarters.
- **Sales:** Engaging with business-to-business (B2B) customers including major retailers, HVAC dealers, wholesalers, government bodies, builders, and commercial clients.
- **Post-Sales Support:** Providing warranty service for consumers, maintenance, and specialised commercial product commissioning through in-house technicians and a national network of regional warranty agents.
- **Subsidiary Operations:** General HVAC Solutions New Zealand Limited performs equivalent distribution and sales operations in the New Zealand market, headquartered in Wellington.

General Inc. Japan, as the parent company, oversees product research and development (primarily in Japan), while wholly owned manufacturing subsidiaries in Thailand and China handle product development and manufacturing activities.

6. Our Supply Chains

6.1 Manufacturing Supply Chain

Our products are primarily manufactured at the following facilities, which form the core of our upstream supply chain:

Entity	Country	Est.	Description
GENERAL Air Conditioning Manufacturing (Thailand) Co., Ltd. (GMT)	Thailand	1991	Manufacturing facility for air conditioners. Second manufacturing plant opened in 2019.
FGA (Thailand) Co., Ltd.	Thailand	1998	Manufacturing motors for air conditioners. Compressor manufacturing commenced in 2009.
GENERAL Air Conditioning R&D (Thailand) Co., Ltd. (GRDT)	Thailand	1999	Established to conduct research and development of air conditioning technology and products.
TCFG Compressor (Thailand) Co., Ltd.	Thailand	2012	Established to manufacture air conditioner compressors. This was originally a joint venture between Toshiba and FGA (Thailand) Co., Ltd. In 2023 FGA (Thailand) Co., Ltd. bought out Toshiba's interest to own the entity outright.
GENERAL Air Conditioning Manufacturing (Shanghai) Co., Ltd. (GMS)	China	1994	Manufacturing facility for air conditioners. An air conditioning technology centre was established within this facility in 2005.
GENERAL Air Conditioning Manufacturing (Wuxi) Co.,Ltd. (GMW)	China	2006	Manufacturing facility for the VRF range of air conditioners.

As at December 2025, the global group employed approximately 8,300 people across its worldwide operations. The Thailand and China manufacturing hubs collectively account for most of our finished goods supply.

6.2 Direct (OEM, ODM) Supply Chain Relationships

Entity	Country	Est.	Description
Advantage Air Aust. Pty Ltd	Australia	2019	OEM manufacturer for AnywAiR branded control systems for ducted HVAC solutions, primarily manufactured in China.
G.I. Industrial Holding Spa	Italy	2020	OEM manufacturer of commercial applied HVAC solutions, primarily chillers.
G.I. Industrial Holding Asia	Malaysia	2020	OEM manufacturer of commercial applied HVAC solutions, primarily packaged roof top solutions and air handling units.
Nube IO Operations Pty Ltd	Australia	2022	OEM manufacturer of smart building IoT solutions, primarily manufactured in China.
Sensibo Ltd	Israel	2023	OEM manufacturer of smart control HVAC solutions for room air conditioning products, primarily manufactured in China.

6.3 Raw Material Risk Exposure

Our HVAC products contain raw materials that carry inherent modern slavery risk. In responsible mineral resource due diligence, we identify the following material-level risk factors in accordance with an RMI-compliant approach:

- **Copper:** A primary component in HVAC heat exchangers and wiring. Copper mining and refining in certain regions carries risks of forced labour and unsafe working conditions.
- **Aluminium:** Used extensively in heat exchanger fins and casings. Aluminium smelting, particularly in regions with weak labour protections, presents elevated risk.
- **Steel:** Used in compressor housings and structural components. Steel supply chains can involve multi-tiered sourcing from high-risk regions.
- **Electronic Components:** Circuit boards, sensors, and control systems contain tin, tantalum, tungsten, and gold (the four conflict minerals), as well as cobalt. These materials are associated with documented risks of forced labour and child labour, particularly in artisanal mining contexts.
- **Refrigerants:** Chemical supply chains present lower but non-trivial labour risks, particularly in production facilities in developing economies.

We are engaging with General Inc. Japan to develop enhanced upstream traceability for these materials, with priority given to electronic component supply chains in CY26.

7. Our Modern Slavery Risks

General Australia acknowledges that the risk of modern slavery practices exists within our operations and supply chains. Our risk assessment framework is informed by the UN Guiding Principles on Business and Human Rights, the Global Slavery Index, the ILO Indicators of Forced Labour, and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

7.1 Geographic and Sector Risk Factors

- **Thailand (GMT and related entities):** The manufacturing sector in Thailand carries documented risks of forced labour, particularly using migrant workers from Myanmar, Cambodia, and Laos who may be subject to debt bondage, document retention, and recruitment fee exploitation. The Global Slavery Index rates Thailand's prevalence as moderate.
- **China (FGS, Wuxi):** Risks include excessive overtime practices, restrictions on freedom of association, and the potential for state-imposed forced labour in certain provinces. The Shanghai facility was assessed as moderate overall risk in the 2021 RBA self-assessment.
- **Malaysia (OEM supplier):** Migrant worker vulnerability, including passport retention and recruitment fee charging by labour intermediaries, remains a documented concern in the Malaysian manufacturing sector.
- **Australia (our own operations):** Lower-risk jurisdiction, but risks exist in third-party warehousing, transport, and cleaning services, particularly where labour hire is used and migrant or temporary visa workers are engaged.

7.2 Specific Risk Categories

- **Forced Labour and Debt Bondage:** The use of forced or compulsory labour, including through debt bondage tied to recruitment fees, particularly affecting migrant workers in Thailand and Malaysia.
- **Child Labour:** Risk of exploitation in the extraction of raw materials (particularly cobalt and tin) used in electronic components further upstream in our supply chain.

- **Excessive Overtime and Wage Violations:** Workers subjected to hours exceeding legal limits without adequate compensation, particularly during peak production periods.
- **Unsafe Working Conditions:** Exposure to hazardous conditions including inadequate safety equipment, particularly in lower-tier manufacturing and raw material extraction.
- **Restriction of Movement and Document Retention:** The withholding of identity documents by employers or labour agents, restricting workers' freedom to leave employment.

8. Our Actions to Address Modern Slavery Risks

Our approach is grounded in the principle that reducing the risk of harm to people is the purpose of due diligence. Consistent with the Australian Anti-Slavery Commissioner's January 2026 Initial Position Paper, we are transitioning from a disclosure-focused framework to one that prioritises reasonable steps to identify, prevent, and address modern slavery risks.

8.1 Governance and Leadership

- **Board-level Accountability:** The Board of General Australia holds ultimate responsibility for the approval and oversight of this statement and the modern slavery due diligence framework.
- **Personnel Continuity:** The team responsible for modern slavery compliance and sustainability due diligence within our former parent, Fujitsu General Limited, transitioned into the same roles within General Inc. Japan. This direct continuity of personnel ensured that active due diligence programmes, supplier relationships, and institutional knowledge were maintained throughout the change of corporate ownership.
- **COO Sponsorship:** The Chief Operating Officer of General Australia and New Zealand is the executive sponsor of modern slavery and human rights due diligence within our Australian and New Zealand operations.

8.2 Policies and Standards

- **Human Rights Policy:** Our Human Rights Policy, inherited from General Inc. Japan and prohibits forced labour, child labour, discrimination, and harassment. It aligns with the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.



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- **Sustainable Procurement Guidelines (Version 4):** Based on the Responsible Business Alliance (RBA) Code of Conduct (Version 8) and JEITA guidelines, these require all suppliers to adhere to strict standards on labour practices, human rights, and environmental protection. As of December 2025, 1,145 of 1,145 suppliers (100%) had formally agreed to these guidelines, including all Top 10 suppliers by procurement value.
- **Code of Conduct:** The General Australia Code of Conduct explicitly sets out the expected behaviours of our people, including ethical conduct and respect for human rights. This is currently being updated to reflect our new corporate identity.

8.3 Due Diligence and Risk Assessment

During the reporting period, our parent group continued to conduct Sustainability Due Diligence (SDD) at its manufacturing facilities and across its supplier base:

- **China (GMW, Wuxi):** Comprehensive SDD was conducted on 64 suppliers across the two Chinese factories, utilising Self-Assessment Questionnaires (SAQs) and on-site audits. Corrective actions were requested where non-conformances were identified.
- **Thailand (GMT):** SDD was conducted on 24 Thai suppliers, applying a risk-based prioritisation approach that focused on suppliers with the highest inherent risk profiles.
- **OEM Partners & Logistics Partners:** Expansion of SDD to include OEM suppliers and downstream business partners was initiated during this period. Our core 3PL logistics providers in Australia and New Zealand were evaluated using General Inc's supplier due diligence framework along with OEM supplier GI Holdings in Malaysia.

8.4 Grievance Mechanisms and Worker Voice

We recognise that audits alone are insufficient to identify all modern slavery risks. We are investing in accessible, independent grievance mechanisms and worker voice initiatives.

- **Elker Platform (Australia and New Zealand):** General Australia operates the Elker platform as our independent, confidential reporting mechanism for employees, contractors, and external stakeholders. Reports can be made anonymously. The Elker platform is accessible via web and mobile, providing a low-barrier channel for raising concerns including modern slavery, workplace safety, and Code of Conduct breaches. During the reporting period, 0 reports were received via Elker, of which 0 related to human rights or labour concerns. All reports were investigated and actioned within our established response framework.
- **Corporate Ethics Helpline (Japan):** The parent group's corporate ethics helpline, established at headquarters, accepts reports from directors, employees, and external parties including primary domestic suppliers.

8.5 Training and Awareness

- **Employee Training:** All General Australia employees complete annual mandatory compliance training that includes a dedicated modern slavery module from Safetrac. This module was refreshed during the reporting period to include content on the appointment of the Australian Anti-Slavery Commissioner (Commonwealth) and the NSW Anti-slavery Commissioner, and the evolving regulatory landscape including the anticipated introduction of mandatory due diligence.
- **Supplier Training:** New suppliers receive training on the Sustainable Procurement Guidelines as part of onboarding to ensure understanding of and compliance with our expectations.
- **Human Rights Training (Global):** All employees across the global group receive annual human rights training, covering identification and reporting of human rights concerns.

8.6 Membership and Collaboration

- **Industry Engagement:** We participate in industry forums focused on combating modern slavery to share knowledge and best practices, consistent with the Anti-Slavery Commissioner's strategic priority of encouraging collaboration within and across sectors.

9. Assessing the Effectiveness of Actions Undertaken

General Australia has continued to take measurable steps to identify and mitigate modern slavery risks during this transitional period:

- **Supplier Due Diligence Coverage:** SDD was conducted on 88 suppliers across the Thailand and China manufacturing hubs (64 in China, 24 in Thailand), covering most of our primary manufacturing supply base.
- **Corrective Actions:** Where non-conformances were identified through SAQs and on-site audits, corrective action plans were developed collaboratively with suppliers. These are tracked to closure, with escalation processes for persistent non-compliance.
- **Grievance Mechanism Accessibility:** The Elker platform remained fully operational throughout the transition. Awareness campaigns were conducted to ensure employees and stakeholders were aware of the reporting channel.

9.1 Looking Ahead: CY26 Priorities

- Conduct a refreshed risk assessment of our domestic Australian operations, with particular focus on third-party labour providers.

10. How We Measure Effectiveness (KPIs)

General Australia utilises the following key performance indicators to assess the effectiveness of our modern slavery risk management. We are committed to evolving these metrics in line with the Commissioner's recommendation to develop qualitative and quantitative effectiveness indicators.

KPI	Measure	Target	CY25 Result	Status
Supplier Compliance	% of suppliers signed to Sustainable Procurement Guidelines	100%	100% (1,145 of 1,145)	On Track
Supplier Due Diligence (Single-year indicators)	Number of suppliers assessed via SAQ and/or on-site audit in high-risk regions	Annual coverage of priority suppliers	88 suppliers (64 China, 24 Thailand)	On Track
Corrective Actions	% of identified non-conformances with active corrective action plans	100%	% of non-conformances under active CAP	On Track



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Employee Training	% completion of annual mandatory compliance training (incl. modern slavery module)	100%	92%	On Track
Grievance Mechanism	Elker platform operational and accessible; reports received, investigated, and actioned	100% of reports investigated within 30 days	0 reports received; [N/A investigated within target	On Track
Board Reporting	Annual modern slavery and human rights updates provided to Board	1 per annum	1 update provided	On Track

11. Our Consultation Process

General Australia actively participated in the consultation process for this Modern Slavery Statement. The transitional period required enhanced consultation to ensure continuity across the change of corporate control:

- **Internal Consultation:** The General Australia executive team, including the COO, MD, and Head of Oceania, reviewed and contributed to the drafting of this statement.
- **Parent Group Engagement:** General Australia consulted with General Inc. Japan. Information was shared regarding operations, supply chains, and modern slavery risks specific to the Australian and New Zealand context.
- **Subsidiary Consultation:** General HVAC Solutions New Zealand Limited was consulted, and its operations are covered by this statement.
- **Policy Alignment:** The General Australia team worked with General Inc. Japan to align the overall approach to modern slavery risk assessment and mitigation, with particular focus on ensuring continuity of the Sustainable Procurement Guidelines and Sustainability Due Diligence programme during the transition.
- **Board Approval:** The Board of General Australia reviewed, provided feedback on, and approved the final statement, confirming its alignment with the company's understanding of its modern slavery risks and actions taken to address them.

General Australia considers the following additional information relevant:

- **Regulatory Awareness:** We are actively monitoring the Australian Government's consultations on proposed reforms to the Modern Slavery Act, including the introduction of a mandatory due diligence obligation and a



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high-risk declaration mechanism, as recommended by the Commissioner's January 2026 Initial Position Paper.

- **Continuous Improvement:** We are dedicated to continuously improving our modern slavery risk management processes, incorporating lessons learned, regulatory developments, and feedback from stakeholders.

12. Appendix 1: Mandatory Criteria – Modern Slavery Act 2018 (Cth)

Section	Criteria	Reference
16(1)(a)	Identify the reporting entity	3. Reporting Entity
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	4. Our Structure; 5. Our Operations; 6. Our Supply Chains
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains	7. Our Modern Slavery Risks
16(1)(d)	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	8. Our Actions to Address Modern Slavery Risks
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	9. Assessing Effectiveness; 10. KPIs
16(1)(f)	Describe the process of consultation with any entities that the reporting entity owns or controls	11. Our Consultation Process
16(1)(g)	Include any other information the reporting entity considers relevant	Throughout this statement
4(a)(b)	Principal Governing Body Approval	1. Authorisation
4(a)(b)(c)(d)(e)	Signature of Responsible Member	1. Authorisation