



Precise Air Group Modern Slavery Statement 2023

1. Introduction

“Modern Slavery” is the phrase used to describe the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

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.

Precise Air Group will not knowingly support or conduct business with any organisation involved in modern slavery practices. Precise Air Group aim for high standards of governance throughout the group and corporate responsibility is of primary importance to us. We recognise the responsibility we have towards our clients and stakeholders, including our employees and society as a whole.

This statement continues to set out the steps aimed to identify and eradicate slavery or human trafficking in our business and supply chain in accordance to the criteria in the Australian Modern Slavery Act 2018.

2. About our company

Structure

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

1. Precise Air Group Pty Ltd
2. Precise Fire Pty Ltd
3. Airgene Pty Ltd
4. Precise Air Group Labour Pty Ltd
5. Precise Air Group NSW Pty Ltd
6. Precise Air Group QLD Pty Ltd
7. 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 400 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 continues to have many direct and indirect supply chains that contribute to the ongoing functioning and operations of the business, both by way of subcontracted labour hire and the purchase of equipment, parts and accessories, and tools.

Nationally, our subcontracted labour hire is made up of approximately 388 active entities, calculated over a three-month period in 2022.

Precise Air Group has approximately 197 suppliers nationally (calculated over a three-month period in 2022) providing equipment, parts, accessories and tools.

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.

Our employees

Our direct workforce is predominantly made up of qualified and skilled employees and we consider the risks of modern slavery to be negligible.

We are governed by employment legislation and all employees must comply with our employee handbook, which reinforces our expectations around ethics and integrity and makes clear that we oppose all forms of discrimination and victimisation.

Employees are inducted to the Precise Air Group using an online induction program which references Modern Slavery Act obligations.

Our subcontractors

We consider our subcontractor labour risk to be very low as we deal with Australian listed and private sector companies who engage locally based employees. We have a strict prequalification process through our contractor management system prior to engagement and we are confident that they adhere to the Australian employment legislation and the relevant award conditions. This platform is constantly reviewed and monitored to ensure strict compliance with our own internal compliance requirements along with external legislative responsibilities of the company.

Our suppliers

We continue to review and analyse the modern slavery risk associated with our suppliers.

Some of the possible risks remain constant in this process which are identified in our operations and supply chains are:

- Geographical traceability of the product and equipment supply chain, where we are working with retailers, wholesalers and distributors with a varying network of suppliers. Precise Air Group relies on accessibility and accuracy of information and our suppliers commit to adhering to the Modern Slavery Act.
- Working with our internal service providers in industries and geographical locations that may employ workers under employment terms that do not align with reasonable minimum or fair standards of pay. For example, IT support, corporate cleaning services, etc.

4. Actions taken to mitigate modern slavery risks

During the last reporting year, we continued to focus on our highest value product and equipment suppliers to ensure that we are accessing information which confirms that they are aware of their obligations in respect of Modern Slavery and ensuring their company values align with the values of Precise Air Group, as well as education of staff.

The practices that we have in place that help us to enforce the standards set to prevent the risk of Modern Slavery and encourage the disclosure of any such practices within our business and throughout our supply chains are:

1. 100% of employees will have received and reviewed the Human Rights Policy
2. Review and implementation of any recommendations arising from the complete review of the employee electronic onboarding training program, with specific regard to Modern Slavery risks
3. 100% of employees have received and completed the compliance training program issued in line with our annual compliance training schedule, which contains a module on mitigation of Modern Slavery risks
4. 75% of the subcontractors targeted respond with a copy of their Modern Slavery statement or declaration
5. 60% of suppliers targeted respond with a copy of their Modern Slavery statement or Declaration

5. Measuring the effectiveness of these actions

In the last reporting year, we achieved a reasonable level of compliance with our stated objectives, as follows:

1. 100% of employees will have received and reviewed the Human Rights Policy.

A business decision was made to combine the Human Rights Policy with a broader Diversity Policy, which will be implemented in 2023-2024.

2. Implementation of any recommendations arising from the complete review of the employee electronic onboarding training program, with specific regard to Modern Slavery risks.

Precise achieved 100% compliance in relation to this action in the 2022-2023 year.

3. 100% of employees have received and completed the compliance training program issued in line with our annual compliance training schedule, which contains a module on mitigation of Modern Slavery risks.

Precise achieved 100% compliance with new hires and over 86% compliance in respect of pre-existing staff.

4. 75% of the subcontractors targeted respond with a copy of their Modern Slavery statement or declaration.

Precise achieved 100% compliance in relation to subcontractor compliance with this action.

5. 60% of suppliers targeted respond with a copy of their Modern Slavery statement or Declaration.

Accurate measurement of this action was difficult and therefore a process change will be implemented in the 2023-2024 year to capture compliance with this action.

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:

1. 100% of employees will have received and reviewed the Diversity Policy, which will include human trafficking, modern slavery, human rights and diversity issues.
2. Introduction of ESG committee whose focus is targeting human trafficking, modern slavery, human rights and diversity issues.
3. Develop and launch a National Employee Awareness program specifically related to human trafficking, modern slavery, human rights and diversity issues.
4. Review and amend process relating to subcontractor and supplier engagement to streamline the method of obtaining subcontractor and supplier anti-slavery compliance, including accurate measurement of compliance of same.

Please note that, in reviewing our due diligence checks for our subcontractors and suppliers, in the event it is discovered that we contribute to modern slavery practices, we will consider ceasing the use of the subcontractor or suppliers.

6. Conclusion

In keeping with our commitment to act with integrity in all of our business operations, Precise Air Group continues to take an active role in working towards a position of no slavery and to support human rights.

This statement is and constitutes our Modern Slavery Statement for the year ending March 2023. It has been issued on behalf of Precise Air Group Holdings Pty Limited by Nadeem Tayar, a Director of the entity, on 30 September 2023.

Approved By

A handwritten signature in black ink, appearing to read 'N. Tayar', is written over a faint, light-colored rectangular stamp or watermark.

Nadeem Tayar

Director & Chief Executive Officer

Precise Air Group Holdings Pty Ltd