



# Precise Air Group Modern Slavery Statement 2024

## 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 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 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 302 active entities, calculated from our subcontractor compliance platform in 2023.

Precise Air Group has 1,640 suppliers nationally with 340 joining during the current reporting period. The suppliers 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 as detailed below.

Since 2020, the Company has introduced:

1. Precise Air Group's Modern Slavery Statement
2. An updated employee Code of Conduct
3. Implementation of a Whistleblowing platform with a specific focus to reporting Modern Slavery risks.
4. The introduction of a Diversity Policy including link to modern slavery issues
5. Continual review and reissue of the employee onboarding program that includes mitigation of Modern Slavery risks
6. Annual compliance training for all employees in line with our annual compliance training schedule, which includes a training module on mitigation of Modern Slavery risks
7. The introduction of an ESG committee, with one objective relating to management of modern slavery risks
8. Development and launch a National Employee Awareness program specifically related to human trafficking, modern slavery, human rights and diversity issues.
9. Development of a 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.

## 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 received training on Diversity, which will include human trafficking, modern slavery, human rights and diversity issues.

This was delivered as part of a dedicated monthly toolbox talk for field based staff and an internal HR Alert during the month of March 2024.

2. Introduction of ESG committee whose focus is targeting human trafficking, modern slavery, human rights and diversity issues.

The ESG committee was formed to collectively work on the initiatives that focused on human trafficking, modern slavery, human rights, and diversity issues including commitment to ethical practices, social responsibility, and sustainable development.

3. Develop and launch a National Employee Awareness program specifically related to human trafficking, modern slavery, human rights and diversity issues.

The company initiated a National Employee Awareness program in all offices and all toolbox talks including visually appealing posters/documentation.

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.

The measurement for financial year 2023-2024 provided 100% acknowledgement of Modern Slavery for all new subcontractors, which represents 33% of the total active subcontractor base. We are confident in the reporting and measurement of this compliance through the use of our dedicated subcontractor compliance platform.

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

Accurate measurement continues to be difficult and therefore a process change will be implemented in the 2024-2025 year to capture compliance with this action as it has previously been paper-based.

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

2. 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.
3. Development of the objectives of the ESG committee for the year, with regard to management of modern slavery risks.
4. Develop and launch a Code of Conduct for subcontractors.

## 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 2024. It has been issued on behalf of Precise Air Group Holdings Pty Limited by Nadeem Tayar, a Director of the entity, on 30 September 2024.

### Approved By



Nadeem Tayar

**Director & Chief Executive Officer**

Precise Air Group Holdings Pty Ltd