

Fujitsu General Australia Modern Slavery Statement



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1. Authorisation

This modern slavery statement was approved by the Board of Directors in their capacity as the principal governing body of Fujitsu General (Aust.) Pty Limited on 23 July 2025, on behalf of Fujitsu General (Aust.) Pty Limited and all reporting entities covered by this statement.

This is signed by Philip Perham, Director and Chairperson and Hidetoshi Komiya, Director as representatives of the Board of Fujitsu General (Aust.) Pty Limited.

Philip Perham

Director & Chairperson Fujitsu General (Aust.) Pty Limited

Dated: 23 / 07 / 2025

Hidetoshi Komiya

Director

Fujitsu General (Aust.) Pty Limited

Dated: 23 / 07 / 2025



2. Introduction

Fujitsu General Australia (FGA) is pleased to present our sixth annual Modern Slavery Statement, demonstrating our ongoing commitment to identifying and addressing the risks of modern slavery within our operations and supply chains. Last year, our parent company, Fujitsu General Limited (FGL), has made significant strides in strengthening our approach to combatting modern slavery. Notably, we have modernised our Sustainable Procurement Guidelines (version 4), aligning them with international standards and incorporating additional measures to mitigate risks throughout our supply chain.

This statement provides a transparent overview of our structure, operations, and supply chains, highlighting potential modern slavery risks and the actions we are taking to address them. FGA recognises the importance of collaboration and continuous improvement in our efforts to uphold human rights and ethical business practices.

3. Reporting entity

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

4. Our Structure

FGA is a wholly owned subsidiary of FGL, a publicly traded company listed on the Prime Market of the Tokyo Stock Exchange (Stock Code: 6755). FGL, which controls Fujitsu General Group (FGG), including FGA, operates in both the air conditioning and telecommunications sectors, engaging in product and component development, manufacturing, sales, and service.

Fujitsu General New Zealand Limited (FGNZ) is a wholly owned subsidiary of FGA performing operations in the New Zealand market like that of FGA in Australia, with its head office based in Wellington, New Zealand.



Name of entity	Country of incorporation	Nature of relationship	ABN / NZBN / NTA	Ownership percentage
Fujitsu General	Japan	Parent	60 200 0106	
Limited (FGL)		Company of	6941	
		FGA		
Fujitsu General	Australia	Reporting	55 001 229 554	100%
(Aust.) Pty Limited		Entity,		
(FGA)		Subsidiary		
		of FGL		
Fujitsu General	New Zealand	Subsidiary	9429 040 786	100%
New Zealand		of FGA	070	
Limited (FGNZ)				
Fujitsu General	A collective name used in this document to represent			
Group (FGG)	Fujitsu General Limited and its global subsidiaries			
	including FGA. It is not a legal entity in itself.			

5. Our Operations

Fujitsu General Australia (FGA) is the exclusive importer and distributor of Fujitsu General and Airstage air conditioning products in Australia, leveraging over 60 years of advanced design and development expertise from its parent company, Fujitsu General Limited (FGL). FGA operates nationwide with branches in Sydney, Brisbane, Adelaide, Melbourne, and Perth, employing 165 people across its sales and service network.

FGA's core operations encompass:

- Importation: Importing complete HVAC finished goods systems and HVAC spare parts from FGL's manufacturing facilities, primarily located in Thailand and China along with various OEM products manufactured by partners with production facilities in Italy, Malaysia and China.
- **Distribution:** Utilising third-party transport and warehousing services to efficiently distribute products nationwide except for Sydney, where the warehouse situated adjacent to the headquarters is run by FGA itself.
- Sales: Engaging with a diverse range of business-to-business (B2B) customers, including major retailers, air conditioning dealers and wholesalers, who primarily sell to end consumers, small to medium businesses, large enterprises, government, builders, and commercial clients.



Post-Sales Support: Providing comprehensive post-sales support, including warranty service, maintenance, and specialised commercial product commissioning, through a network of in-house technicians and regional warranty agents. This network ensures nationwide support for FGA's end customers.

FGL, as the parent company, oversees product research and development, primarily in Japan, while its wholly owned subsidiaries in Thailand and China handle significant product development and most manufacturing activities. FGL utilises its own personnel and facilities for designing, manufacturing, distributing, and selling its products.

6. Our Supply Chains

Most relevant to the supply chain of FGA are the following FGG entities:

Name of entity	Country of incorporation	Established	Notes
Fujitsu General (Thailand) Co., Ltd. (FGT)	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.
Fujitsu General Air Conditioning R&D (Thailand) Co., Ltd.	Thailand	1999	Established to conduct research and development of air conditioning technology and products.



Name of entity	Country of incorporation	Established	Notes
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.
Fujitsu General (Shanghai) Co., Ltd (FGS)	China	1994	Manufacturing facility for air conditioners. An air conditioning technogology centre was established within this facility in 2005.
Fujitsu General Central Air- Conditioner (Wuxi) Co., Ltd	China	2006	Manufacturing facility for the VRF range of air conditioners.
Fujitsu General Laboratories Limited	Japan	2016	Estlabished to conduct research and development of advanced technologies for FGG.

As at March of 2025, FGL had 1,716 employees and FGG had 8,503 employees globally.

FGA has direct supply chain relationships with the following entities:

Name of entity	Country of	Relationship	Notes
	incorporation	Established	
Advantage Air Aust.	Australia	2019	OEM manufacturer for
Pty Ltd			AnywAiR branded control
			systems for ducted HVAC
			solutions, primarily
			manufactured in China.



Name of entity	Country of incorporation	Relationship Established	Notes
G.I. Industrial	Italy	2020	OEM manufacturer of
Holding Spa			commercial applied HVAC
			solutions, primarily chillers.
G.I. Industrial	Malaysia	2020	OEM manufacturer of
Holding Asia			commercial applied HVAC
			solutions, primarily
			packaged roof top solutions
			and air handling units.
Nube IO Operations	Australia	2022	OEM manufacturer of smart
Pty Ltd			building IoT solutions,
			primarily manufactured in
			China.
Sensibo Ltd	Israel	2023	OEM manufacturer of smart
			control HVAC solutions for
			room air conditioning
			products, primarily
			manufactuered in China.

7. Our Modern Slavery Risks

FGA acknowledges that the risk of modern slavery practices exists within our operations and supply chains. Our risk assessment, informed by sources such as the UN Guiding Principles on Business and Human Rights, the Global Slavery Index, and the List of Goods Produced by Child Labor or Forced Labor, has identified several key risk factors:

- **Country of Origin:** Our supply chain includes countries like Thailand, China and Malaysia which have been identified by the Global Slavery Index as having a moderate prevalence of modern slavery, particularly in sectors like manufacturing and construction. Prevalence in Italy and Japan is considerably lower at 4 and 1.1 respectively.
- **Industry Sector:** The HVAC industry, particularly the manufacturing of electronic components and metal parts, has been associated with forced labour and other exploitative practices.
- **Complex Supply Chains:** Our reliance on multi-tiered supply chains increases the complexity of monitoring and managing risks of modern



slavery, as it can be challenging to gain visibility into the practices of lower-tier suppliers.

Based on these factors, we have identified the following specific modern slavery risks within our supply chain:

- **Forced Labour:** The use of forced or compulsory labour, including debt bondage and human trafficking, in the production of our goods.
- **Child Labour:** The exploitation of children in the manufacturing process, particularly in the production of components.
- Unsafe Working Conditions: Exposure of workers to hazardous working conditions, including lack of safety equipment and inadequate health and safety measures.
- **Excessive Overtime:** Workers being subjected to excessive working hours without adequate compensation or rest periods.
- **Wage Violations:** Workers not receiving fair wages or being subject to unlawful deductions from their pay.

FGA is committed to proactively addressing these risks through due diligence processes, ongoing monitoring, and collaborative engagement with our suppliers to ensure ethical sourcing practices throughout our supply chain.

8. Our Actions to Address Modern Slavery Risks

FGG's Commitment to Addressing Modern Slavery Risks

Fujitsu General Group (FGG) recognises the potential for modern slavery risks within our operations and global supply chains, particularly given the manufacturing context in countries like Thailand and China, where forced labour and other human rights abuses have been reported. We are committed to upholding human rights and ensuring ethical business practices throughout our value chain.

Leadership and Governance

FGG's response to modern slavery is headed by the Corporate Vice President, Toshio Kano, General Manager of CSuO (Corporate Sustainability Officer) Office at Head Office, as part of our broader sustainability efforts. Each subsidiary,



including Fujitsu General Australia (FGA), has a designated representative responsible for overseeing modern slavery prevention measures.

Policies and Guidelines

Our commitment is embedded in our corporate philosophy, the "FUJITSU GENERAL Way" and reinforced by the "Code of Conduct" which explicitly prohibits unethical practices. We have implemented the following policies and guidelines to address the identified risks:

- <u>FGG Human Rights Policy</u>: This policy aligns with international human rights norms, including prohibitions on forced labour, child labour, discrimination, and harassment. It emphasises safe working conditions, and freedom of association.
- Sustainable Procurement Guidelines version 4: These guidelines, based on the RBA Code of Conduct (Ver. 8) and JEITA guidelines, require suppliers to adhere to strict standards on labour practices, human rights, and environmental protection. They explicitly prohibit the use of forced labour, child labour, and conflict minerals. Since November 2019, FGG has required all new suppliers agree to this guideline prior to onboarding. For existing suppliers, we have actively sought their consent through a confirmation form. As of March 31, 2025, 1,081 (98%) of 1,100 suppliers have formally agreed to the guidelines. 554 in Japan, 268 in China and 259 in Thailand. Notably all of our Top 10 suppliers by procurement amount have committed to these standards.

Due Diligence and Remediation

FGG conducts ongoing "Sustainability Due Diligence" through self-assessment questionnaires and on-site audits of suppliers. These assessments prioritise highrisk suppliers and those with significant business relationships. We collaborate with suppliers to improve their compliance with our guidelines, addressing identified issues such as unsafe working conditions, excessive overtime, or wage violations.

Initiatives for FGA and FGG

 Workforce: FGA conducts thorough background checks on all employees, ensuring compliance with Australian labour laws and verifying working rights to mitigate the risk of forced labour.



- Memberships: FGG maintains a membership with the UN Global Compact, disclosing results annually to the entity. The supplier code of conduct has been based on the Responsible Business Alliance version 8 framework in line with guidance from the Responsible Business Conduct Guidelines of Japan Electronics and Information Technology Industries Association (JEITA).
- Whistleblower Protection: FGA have established confidential reporting channels, including the Elker platform, to encourage employees and stakeholders to report any suspected breaches of our Code of Conduct, including modern slavery concerns.
- Training: All FGG employees, including those at FGA, receive annual human rights training. FGA employees additionally complete specific training on modern slavery, covering its identification and reporting. Suppliers also receive training on the Sustainable Procurement Guidelines as part of onboarding to ensure their understanding and compliance. The FGA Modern Slavery e-learning module has been refreshed for FY25 to include recent changes such as the appointment of a Commonwealth Anti-Slavery Commissioner and the NSW Anti-slavery Commissioner as FGA's head office is based in NSW, Australia.

FGG's Internal Assessment of Operations

In 2021, FGG proactively conducted a comprehensive self-assessment of its global operations using the Responsible Business Alliance (RBA) Self-Assessment Questionnaire. This assessment covered its corporate head office (FGL) and two of its largest manufacturing facilities located in China (FGS) and Thailand (FGT). The results indicated a low-risk profile for both the corporate head office and the Thai manufacturing facility. However,the Chinese manufacturing facility in Shanghai was identified as presenting a moderate overall risk. This assessment provides valuable insights into FGG's commitment to identifying and mitigating potential risks within its operations and supply chain.

Continuous Improvement

FGG is committed to continuous improvement in our efforts to combat modern slavery. We regularly review and update our policies, procedures, and training programs to reflect best practices and evolving risks. We are dedicated to working collaboratively with our suppliers to build a transparent and ethical supply chain.



The corporate ethics helpline is also established at FGL, the headquarter of FGG, and accepts reports not only from FGL directors and employees, but also from external parties, including primary suppliers.

9. Assessing the Effectiveness of Actions Undertaken

Fujitsu General Group (FGG) has taken significant steps in FY2024 to proactively identify and mitigate modern slavery risks within its operations and supply chain, with a focus on high-risk regions like China and Thailand:

- China: FGG conducted comprehensive Sustainability Due Diligence on 64 suppliers across two factories, utilising both Self-Assessment Questionnaires (SAQs) and on-site audits. This approach allowed for indepth scrutiny of supplier practices, identifying areas for improvement and requesting corrective actions where needed.
- **Thailand:** Similar due diligence was performed on 42 of their suppliers. This demonstrates a risk-based approach, focusing resources on areas of higher concern.
- Japan: To further enhance oversight, FGG established a "Human Rights Promotion Commmittee" in addition to the "Sustainability Promotion Committee" at the headquarters level, along with a dedicated working group to oversee and report on due diligence activities across the entire group and its supplier base.

Looking Ahead (FY2025 Plans)

FGG will expand its Sustainability Due Diligence (SDD) efforts to include OEM suppliers and downstream business partners, reinforcing its commitment to ethical sourcing throughout the supply chain. With regard to SDD survey targets, FGG will conduct due diligence and investigate with enhanced human rights and occupational health and safety items.

10. How we Measure Effectiveness (KPIs)

FGG recognises the importance of continuous monitoring and improvement. To assess the effectiveness of its initiatives, FGA utilises the following key performance indicators (KPIs):

1. **Supplier Compliance:** Ensuring that at least 98% of suppliers have signed the Sustainable Procurement Guidelines, demonstrating their commitment to ethical practices. The target is 100%.



- 2. **Supplier Due Diligence:** Conducting thorough assessments through SAQs and on-site audits, covering a significant portion of the supplier base in high-risk regions.
- 3. **Corrective Actions:** Tracking the implementation of corrective actions by suppliers identified as needing improvement, ensuring continuous progress towards ethical standards.
- 4. **Training:** The percentage completion rate of employees finishing their annual mandatory refresher compliance training. Topics include Code of Conduct, whistleblowing and ethics, anti-competitive conduct, anti-bribery and corruption, consumer protection and unfair business conduct, privacy, bullying and harassment and modern slavery awareness.

FGG will continue to review and refine these KPIs, developing additional indicators as needed to comprehensively evaluate the impact of its modern slavery risk mitigation strategies. This commitment to ongoing assessment and improvement reinforces FGA's dedication to fostering a responsible and sustainable supply chain.

11. Our Consultation Process

FGA, as a subsidiary of FGL, actively participated in the consultation process for this modern slavery statement. The process involved:

- **Information Sharing:** FGG provided detailed information to FGA regarding its operations, supply chains, and specific risks of modern slavery identified in the Australian context. This included information on suppliers, subcontractors, workforce composition, and any known issues or concerns.
- **Collaboration:** FGA collaborated with FGL's CSuO Office and the Sustainability Due Diligence Promotion Working Group to align on the overall approach to modern slavery risk assessment and mitigation.
- **Review and Feedback:** FGA provided feedback to ensure accuracy and completeness of the information related to its Australian operations.
- Approval: FGA's and FGL's senior management reviewed and approved the final statement, confirming its alignment with the company's understanding of its modern slavery risks and actions taken to address them.

FGA considers the following information relevant to understanding its commitment to addressing modern slavery:



- Local Context: FGA is committed to understanding and addressing the unique modern slavery risks present in Australia, such as the exploitation of migrant workers and vulnerable groups.
- **Stakeholder Engagement**: FGG actively engages with stakeholders, including employees, customers, and industry associations, to raise awareness of modern slavery and gather insights on potential risks.
- **Industry Collaboration:** FGG participates in industry initiatives and forums focused on combatting modern slavery to share knowledge and best practices.
- **Continuous Improvement:** FGG is dedicated to continuously improving its modern slavery risk management processes, incorporating lessons learned and feedback from stakeholders.



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

Section of Act	Criteria	Reference in this statement
16(1)(a)	Identify the reporting entity	3. Reporting Entity, Page 4
16(1)(b)	Describe the structure, operations and	4. Our Structure Pages 4-5
	supply chains of the reporting entity	5. Our Operations Pages 5-6
		6. Our Supply Chains, Pages
		6-8
16(1)(c)	Describe the risks of modern slavery	7. Our Modern Slavery Risks,
	practices in the operations and supply	Pages 8-9
	chains of the reporting entity, and any	
	entity that the reporting entity owns or	
	controls	
16(1)(d)	Describe the actions taken by the reporting	8. Our Actions to Address
	entity and any entity that the reporting	Modern Slavery Risks, Pages
	entity owns or controls, to assess and	9-11
	address those risks, including due diligence	
4 ((() ()	and remediation processes	
16(1)(e)	Describe how the reporting entity assesses	9. Assessing the
	the effectiveness of such actions	Effectiveness of Actions
		Undertaken, Page 12 10. How we Measure
		Effectiveness (KPIs), Page
		12-13
16(1)(f)	Describe the process of consultation with: (i)	11. Our Consultation Process,
	any entities that the reporting entity owns	Page 13-14
	or controls	
16(1)(g)	Include any other information that the	
	reporting entity considers relevant.	
4(a)(b)	Principal Governing Body Approval	1. Authorisation, Page 3
4(a)(b)(c)(d)(e)	Signature of Responsible Member	1. Authorisation, Page 3