



Beacon Lighting Group Limited

ACN 164 122 785

Code of Conduct

1. Introduction and Purpose

The Beacon Lighting Group has a proud history and strong culture which are a reflection of the dedication and contribution of its team. The Board and Senior Management have developed and are committed to this code of conduct (**Code of Conduct** or **Code**), which articulates the standards of behaviour that have always been a feature of the way we operate and which will form the foundation of our continued future success.

The Code of Conduct expands upon our company values (refer section 3), providing information that will guide everyone in the performance of their daily duties. The objective of the Code of Conduct is to ensure that high standards of corporate and individual behaviour are observed by all Team Members in the context of their employment and to assist with the practical implementation of the Company's values. The Code explains:

- our legal, moral and ethical standards, along with how they are achieved through our behaviours and the decisions that we make;
- that the reputation of the business and our brand is supported by the behaviour of our people;
- the commitment of the Company, its directors and senior executives and employees, to protect and promote the interests of the Company at all times is clearly articulated;
- that the daily duties associated with operating our business at all levels, are discharged lawfully and in a manner that is consistent with our values, management principles and culture;
- the consequences of failing to adhere to our standards of behaviour are also understood;
- that any reported violations of the Code or unethical or unlawful behaviour are investigated and appropriately acted upon.

2. Scope

This Code of Conduct and the expected behaviours apply in all our business dealings and all of our dealings with each other, customers, suppliers, shareholders and other stakeholders. It extends to:

- All Team Members (employees) throughout the Beacon Lighting Group and its controlled entities (“the **Company**”) – this includes those working in full time, part time or casual capacities at all levels of the business, including senior executives
- Contractors and consultants working within our business and / or on behalf of our business
- Directors of the company including the Chief Executive Officer and Executive Chairman.

The Code applies whenever a Team Member is representing the Company and therefore may include times outside of their usual workplace and/or working hours.

The Beacon Lighting Group strongly encourages others who partner with us (such as our Franchisees) to adopt and maintain similar conduct and ethics principles as outlined in this Code. Where we operate in foreign markets outside Australia, we ensure that we meet local legislative requirements.

For the purposes of simplicity, throughout the Code, the term “Team Members” will be used but is intended to also mean Contractors and Directors.

The Beacon Lighting Group takes this Code of Conduct, its values and associated policies very seriously. As a Team Member, Contractor or Director engaged in our business, you are required to comply with the principles and the spirit of our values and Code of Conduct.

3. General Guiding Principles

Our Code of Conduct requires all Team Members to fulfil the responsibilities of their role in full compliance with the law, our Company policies and procedures, and our values.

The standards and expectations outlined in the Code of Conduct cannot anticipate every situation which may pose a legal, ethical or moral issue. It is not a prescriptive set of rules for business behaviour, but rather a practical set of guiding principles that reflects the Company's expectations in relation to conduct at work. Ultimately all Team Members need to listen to their own conscience and exercise sound judgement in the decisions they make and the way they choose to behave.

In doing so, it is recommended that Team Members reflect on the following questions:

1. Does it feel like the right thing to do?
2. Would others see my actions as appropriate?
3. Am I acting in the best interest of the Company?
4. If my actions were reported in the media, what would be the reaction?
5. Am I acting consistently with our company values?

Our Values

Our seven values govern the general behaviour of all Team Members, wherever they work and represent our company. They require everyone to:

Be A Beacon

Be a shining example. Do everything to the best of your ability with enthusiasm and energy, and inspire others.

Be Caring

Care about what you do. Provide exceptional service to your customers and look out for each other

Be Respectful

Be professional at all times. Listen to other's points of view, value each other's differences and give everyone a "fair go".

Be Ethical

Be honest and open. Demonstrate integrity in all that you do.

Be Responsible

Take ownership of your role and responsibilities. Be empowered to make informed decisions.

Be a Team Player

Work together with others to achieve the best outcomes. Recognise each other's strengths and support one another.

Be Successful

Commit to achieving your goals and deliver results. Celebrate your success with humility and strive for continuous improvement.

If upon reflection of these guiding principles and reviewing our Code of Conduct, there remains any doubt about the best way to handle a situation that poses a legal, ethical or moral dilemma, advice and guidance should be sought by discussing the matter with management or the human resources department.

4. Be Ethical

4.1 Honesty and Integrity

Team Members are required to perform their duties in a manner that is of the highest standards of integrity at all times. The trust and respect of our customers can only be earned by acting in good faith, in accordance with the law, our Company values, with honesty, and in the best interests of the Company, its customers and shareholders at all times.

We pride ourselves on a culture where individuals who make and admit to genuine mistakes and take responsibility, are supported in their learning and assisted in correcting the error.

However, Beacon Lighting will not tolerate behaviour that is dishonest, fraudulent or deceitful.

4.2 Conflict of Interest

Team Members must ensure that there is no conflict of interest between their personal interests and their duties, obligations and responsibilities to Beacon Lighting, to whom they owe their first business loyalty. This involves avoiding placing themselves in a position that may lead to a conflict of interest, declaring any sources of potential conflict, and where they have concerns that their loyalties may be divided, discussing the matter with management.

All Team Members should seek approval from their manager before accepting any outside business interests including non-Beacon Lighting work, business ventures, directorships (other than to a board of a non-trading family company), partnerships or other interests which have the potential to create a conflict of interest.

All Team Members should seek to keep an arm's length relationship when dealing with customers and suppliers.

Directors and non-executive directors must be independent in judgement and are required to disclose to the Board any other interests that may form a conflict of interest and comply with the *Corporations Act 2001 (Cth)* and the Company's constitution in relation to the disclosure of material personal interests.

4.3 Other Employment

Team Members must declare to Beacon Lighting any other employment that they are undertaking and must ensure that such employment:

- Is not undertaken during the period that they are employed to work for Beacon Lighting
- Does not adversely affect their ability to perform their duties for Beacon Lighting
- Does not pose any conflict of interest

4.4 Fair Dealing

Team Members must deal fairly with our customers, suppliers and other stakeholders and must not take advantage of others through practices such as: misrepresentation of facts, abuse of confidential information, undue influence, concealment, illegal conduct or other unethical and unfair practice.

4.5 Share Trading

The law prohibits a person from dealing in shares of a company whilst in possession of inside information (i.e. information that is not generally available to the public and if it was available, a reasonable person would expect it to have a material effect on the value of the shares).

Therefore Team Members must not make improper use of information for personal gain. Nor may they pass inside information onto any other person who might use that information to base decisions about trading in Company shares – and must not themselves trade in Company shares on the basis of that inside information. All share trading must be in accordance with the Company's Securities Trading Policy which can be found on our corporate website: www.beaconlightinggroup.com.au

4.6 Privacy and Confidentiality

The Beacon Lighting Group strives to operate in accordance with privacy legislation. Beacon Lighting acknowledges and is committed to protecting the privacy of our customers. We will collect, use and disclose and hold personal information in accordance with the relevant legislation.

All Team Members are privy to sensitive and confidential information in the course of performing their duties to varying degrees. It is expected that Team Members will handle such information appropriately and will not use this information for personal gain or share it with others unless required to do so as part of their normal work.

If Team Members are unsure about the confidentiality of information, they should refer to their manager for guidance.

The obligations on Team Members in relation to confidentiality and proper use of information continue even after leaving Beacon Lighting's employment.

4.7 Public comment

Team Members must not disclose publicly any information about the Company or make any public comments on behalf of the Company unless authorised to do so.

Any requests for information by the media are referred to the Company Secretary (or in his/her absence, the Chief Executive Officer, or his/her delegate) for proper and authorised response.

4.8 Bribery, corruption, gifts , inducements and benefits

Team Members must always comply with the Company's Anti-Bribery and Corruption Policy laws against bribery, corruption and related conduct applying to the Company wherever it operates. The Company's Anti-Bribery and Corruption policy can be found on our corporate website: www.beaconlightinggroup.com.au

Any offer of gifts or benefits Team Members may receive from third parties in the course of their employment, including but not limited to suppliers of goods or services, clients and customers must be reported in accordance with the Group's Anti-Bribery and Corruption policy. If the gift is perceived to be a conflict of interest or have the potential to impair judgement, the Team Member may be advised that it is inappropriate to accept such gifts, or may require the individual to utilise the gift for the benefit of the business.

Team Members must not offer bribes, gifts or inappropriate inducements (including excessive discounts) in order to acquire or retain business or receive any favoured treatment.

Team Members must also respect the terms under which benefits and privileges are provided as part of their employment and not inappropriately pass those benefits on to others who are not entitled to receive them (such as the company staff discounts privileges).

4.9 Record keeping and Financial Integrity

Team Members must maintain full and accurate records of their activities in accordance with Company policies and procedures.

It is not permitted to remove, destroy, tamper with or falsify any records, or adjust them for personal gain.

Such records are the property of the Beacon Lighting Group and must not be destroyed without appropriate authority.

The Company is committed to producing complete, accurate and truthful records and reports, and has stringent financial accounting procedures that are overseen by management, the Audit and Risk Committee and the external auditor. Therefore, all Team Members must ensure in the course of their duties, that the financial transactions of the Company are accurately recorded, and that the Company's funds and assets are used only for authorised purposes.

Important Do's and Do Not's for Team Members – Be Ethical

(This list provides some key points about behaviour – however it is not exhaustive and for more complete information refer to our Company policies)

- ✓ DO exercise honesty and admit mistakes so that they can be corrected
- ✓ DO treat company information with discretion
- ✓ DO keep promises and commitments you make to your customers and colleagues
- ✓ DO show that you are trustworthy in all that you do
- ✓ DO declare any outside interests, employment or gifts that have the potential to create a conflict of interest
- ✓ DO follow all procedures in relation to maintenance of passwords and user profiles to protect unauthorised access to our information systems

- × DON'T act in a manner that is deceitful or dishonest
- × DON'T tamper with, or falsify company records
- × DON'T disclose confidential information to others outside our business

5. Be Responsible

5.1 Professional appearance

All Team Members are expected to maintain the highest standards of professional grooming and appearance at all times.

For particular workplaces, Beacon Lighting provides Team Members with uniforms, identification badges

and protective safety apparel, which Team Members are expected to wear as specified in our policies.

5.2 Attendance

As a part of our commitment to our customers and each other, we have a culture of team work and service. This means that all Team Members are expected to be reliable and punctual in their attendance for their hours of work as established in their terms of employment. Timekeeping procedures must be followed as required in our various workplaces.

Where a Team Member is prevented from attending work by ill-health or other lawful reason, they must comply with all Company policies in relation to the notification of their absence and the provision of evidence to substantiate their absence.

Team Members are also expected to follow all Company procedures in relation to applying for planned leave.

5.3 Use of Internet/E-mail/Social Media

Internet and email services are provided in workplaces for business purposes only and Team Members must not access their own personal emails or social networking sites whilst at work or using company computer

systems. Team Members must not make personal comments on their private networking sites that could be potentially damaging to Beacon Lighting.

Many Team Members are provided with a personal email address due to the requirements of their role. All emails are subject to Beacon Lighting's monitoring and filter, to ensure that professional communication is maintained.

It is strictly prohibited to use the internet to access or download material that is offensive, malicious, sexual or racist in nature, subversive or otherwise related to illegal activity or contrary to Beacon Lighting's policies.

5.4 Alcohol, Drugs, Intoxicants and Smoking

Team Members are not permitted to be under the influence of alcohol, intoxicants or illegal or recreational drugs whilst at work. At the direction of Beacon Lighting, an Team Member may be required to undergo testing for the use of drugs, intoxicants or alcohol in accordance with Company policies and the terms of their employment. The possession, soliciting, selling, distribution or consumption of illicit or non-prescribed drugs is strictly prohibited.

Smoking is not permitted in any Beacon Lighting locations or vehicles. Team Members that do wish to smoke are only able to do so during allocated breaks, outside the building in a discreet area. We do support and encourage those Team Members who genuinely wish to quit smoking.

5.5 Safety in the Workplace

Beacon Lighting recognises its moral and legal responsibility to provide, in so far as is reasonably practicable, a safe and healthy work environment for all Team Members. Our Executives will ensure they exercise due diligence and that we consistently demonstrate a strong commitment to Health and Safety through:

- the provision and maintenance of a working environment that is safe and without risks to health, including safe access to and exit from the workplace;
- the provision and maintenance of plant, structure and systems of work that are safe and do not pose health risks;
- the safe use, handling, storage and transport of plant, structure and substances;
- the provision of adequate facilities for the welfare of Team Members at work;
- the provision of information, instruction, training or supervision to Team Members needed for them to work without risks to their health and safety and that of others around them; and
- the monitoring of the health of Team Members and the conditions of the workplace to prevent injury or illness arising out of the conduct of Beacon Lighting.

Team Members must ensure that they do not put their own, or others, safety at risk and that they follow the reasonable directions provided by Beacon Lighting in ensuring their safety.

5.6 Company Assets and Property

All Team Members are expected to respect Company property and any property belonging to our customers whilst in our possession and property belonging to other Team Members. Dishonestly, deceit or theft will not be tolerated. Company property may include (but is not limited to): cash, products, fixtures and fittings, computer and communications equipment and software, plant and other machinery, and documents and records. It may also include items allocated to Team Members as required in the performance of their duties, such as mobile phones, portable computers/ tablets, tools, credit or fuel cards, and fully maintained Company vehicles.

Many Beacon Lighting workplaces have closed circuit television surveillance which may be accessed in the event that there is reason to believe that a theft or misappropriation of, or damage to, Company property has occurred.

All inventions, computer software processes, discoveries and improvements made by Team Members during their employment with Beacon Lighting, remain the property of Beacon Lighting. Therefore all trade secrets, proprietary rights to intellectual property are owned by Beacon Lighting. This includes but is not limited to copyright, trademarks, patents, registered designs, ownership rights, exclusive rights to develop, use, sell, make licence or benefit from any inventions, discoveries or processes and improvements made during a Team Member's employment with Beacon Lighting.

5.7 Action within delegated authority

All Team Members have a level of authority within which they are authorised to act on behalf of Beacon Lighting. Managers must inform their Team Members of their authority level. In circumstances of uncertainty regarding the level of authority or of matters related to policy, Team Members must seek clarification before proceeding.

Team Members must exercise the authorities of their role for their proper purpose and must not take improper advantage of their position. They must fulfil their duties following the reasonable instructions of management and with due care and diligence.

Important Do's and Do Not's for Team Members – Be Responsible

(This list provides some key points about behaviour – however it is not exhaustive and for more complete information refer to our Company policies)

- ✓ DO maintain a professional standard of appearance at all times
- ✓ DO be reliable and dependable
- ✓ DO be responsible for the Company's property, and that belonging to our customers whilst in our possession, or belonging to other Team Members
- ✓ DO seek permission to take any Company property from the workplace
- ✓ DO use email and internet to communicate effectively if required to do so in your job – remembering that when we use this vital communication tool, we need to choose our language carefully
- ✓ DO follow all safety procedures and requirements and report any concerns

- × DON'T access personal email accounts and social networking sites while at work
- × DON'T use SMS messaging or emails to communicate with your Manager for example if you are sick and can't get to work
- × DON'T be distracted by personal calls on mobile phones while at work. In stores this means that personal mobile phones should be turned off and only used in breaks
- × DON'T be under the influence of alcohol, intoxicants or illegal or recreational drugs whilst at work
- × DON'T deliberately destroy, damage or misappropriate company property or anything that does not belong to you
- × DON'T assume that damaged stock or goods is not wanted or valuable to the Company

6. Be Respectful

6.1 Fair Treatment

All Team Members have a right to be treated fairly, and with dignity and respect. Team Members also have a responsibility to conduct themselves in a professional and orderly manner that is respectful of others at all times. Beacon Lighting embraces diversity in the workplace and is committed to equal opportunities for all Team Members. Beacon Lighting is committed to its legal obligations in relation to this and strives to provide an environment free of discrimination, harassment and vilification.

Team Members should report any concerns to their manager or human resources and are assured that complaints will be dealt with sensitively.

6.2 Recruitment and Selection

Beacon Lighting managers are accountable for the recruitment and selection of Team Members for their team, with the support of Human Resources and their Managers. Beacon Lighting is committed to attracting the best talent and this is reflected in the recruitment and selection processes, which ensure decisions are based on merit and not on attributes that are irrelevant to employment or performance.

6.3 Bullying and Violence

Beacon Lighting and Team Members have a legal and moral responsibility to ensure that a safe working environment is maintained at all times. Behaviours that are violent in nature or that constitute bullying are unacceptable and are inconsistent with our culture and values and therefore will not be tolerated in the Company.

Any incident or complaint that Beacon Lighting becomes aware of will be investigated and appropriate actions will be taken. Steps will also be implemented to prevent any recurrence of the situation.

If there is evidence suggesting that the matter may be criminal in nature, in accordance with State and/or Federal laws, the matter will be referred to the police or other appropriate authorities.

Important Do's and Do Not's for Team Members – Be Respectful

(This list provides some key points about behaviour – however it is not exhaustive and for more complete information refer to our Company policies)

- ☑ DO treat everyone fairly and equally regardless of their background
- ☑ DO enjoy a friendly, fun atmosphere at work whilst being considerate of others feelings
- ☑ DO communicate with professional respect both in person and on the telephone with both customers and fellow Team Members

- × DON'T harass or discriminate against fellow Team Members, customers or suppliers
- × DON'T offend or humiliate others by your behaviour, such as making lewd comments or offensive jokes, or making unwelcome physical contact
- × DON'T use offensive language or obscene language
- × DON'T engage in “pranks” that may result in physical or psychological injury

7 Be Caring

7.1 Commitment to Customers

We are committed to treating our customers fairly and with respect. We value their feedback and address their concerns promptly. We ensure that the products we sell are safe and meet regulatory requirements, and that our marketing and promotional information is clear and truthful.

Our Team Members are dedicated to the delivery of our mission – “to light our customers lives with exciting products that are environmentally friendly and fashionable, delivered with expertise and unparalleled service”.

With this in mind, we strive to ensure our customer’s expectations are not only met, but exceeded.

Our Team Members are provided with comprehensive training to ensure that they have the latest product knowledge and on demonstration of required levels of skill and ability will receive internal acknowledgement as Accredited Lighting Consultants.

All Team Members must ensure that customers are always our priority, and experience an enthusiastic and helpful approach and receive expert advice, in the spirit of our values to Be A Beacon and BeCaring.

7.2 Commitment to Suppliers

We are committed to acting fairly and honestly in dealings with our suppliers, trade partners, and others we do business with, who we acknowledge are key to our ongoing success.

Team Members that are involved in the purchase of our product range or other goods or services on behalf of the Company, need to work ethically and in accordance with relevant legislation and contractual requirements.

7.3 Commitment to Shareholders

Beacon Lighting is committed to achieving outstanding performance and results to deliver value to our shareholders, whilst always considering the rights and interests of the Company’s shareholders, employees, customers and the financial community generally.

Our shareholders can expect all Team Members to act in accordance with this Code of Conduct, so that their actions support and enhance the performance and reputation of the business.

7.4 Commitment to the Community and Environment

The Beacon Lighting Group understands that as an Australian and international corporate citizen, and a leader in our industry, we have an obligation to ensure that our business activities maintain and improve the environment for current and future generations of our customers and Team Members alike.

We actively support the communities in which we operate and require all Team Members to uphold the Company’s commitment to pursue good corporate citizenship whilst performing their duties. This includes abiding by the letter and the spirit of all local laws and regulations.

Should Team Members wish to make a contribution on behalf of the Company to support local community needs (such as donations or sponsorships), they must first seek approval from management or the Marketing Department.

Team Members may voluntarily participate in the political process as individuals but must not engage in any actions that may lead others to believe that their views reflect the position of the Company. It is against Company policies to use corporate funds or resources for political purposes.

We are committed to operating our businesses profitably in an environmentally conscious and sustainable manner consistent with our Company values and to providing our customers with environmentally friendly and energy efficient products and services as enshrined in our vision and mission statements.

Our business philosophy is to embrace technological advancements to continually improve the environments of our customers and our business operations and to integrate environmental considerations in all our business planning and decision making.

Important Do's and Do Not's for Team Members – Be Caring

(This list provides some key points about behaviour – however it is not exhaustive and for more complete information refer to our Company policies)

- ✓ DO treat customers, suppliers and others you do business with, with respect
- ✓ DO make customer service a priority
- ✓ DO ensure that the service you provide reflects the high standards of our business.
- ✓ DO what you can to reduce the impact of your work on the environment and prevent the waste of resources

- × DON'T give or receive gifts, donations or favours without proper authorisation
- × DON'T engage in actions or make statements of a political nature that may lead others to believe that you represent or reflect the views or position of the Company

8 Breaches of the code

8.1 What to do if you suspect a breach

All Team Members at Beacon Lighting have a responsibility to raise any concerns regarding a suspected or actual breach of the Code of Conduct with their manager or human resources department. Any complaint received will be dealt with sensitively, and be appropriately investigated. Beacon Lighting is committed to fostering an environment where matters can be reported without fear of retribution or discrimination.

8.2 Consequences of a breach

Any breaches of the Code of Conduct will be viewed seriously by Beacon Lighting. In instances where there has been an investigation and it has been identified that there has been a breach of the Code of Conduct, Beacon Lighting will take appropriate action, and in some situations this may result in formal disciplinary action up to and including termination of employment or their engagement with the Company.

Where a breach indicates illegal activity, the Company may refer the matter to the police with a view to criminal proceedings, as well as instigating civil restitution proceedings for the recovery of Company costs and loss of assets.

Team Members should speak out when they suspect, experience or observe any behaviours that are inconsistent with this Code, our policies or values.

9 Communicating and Adhering to the Code

Our Code of Conduct establishes important guidelines in relation to the way all Beacon Lighting Team Members and Directors are expected to behave. It is founded on our Company values and together with the values, provides the framework within which our actions and decisions should be taken.

In many cases, more detail about conduct in the workplace is provided within our Company policies, published in our Operations Manual on the Company intranet and accessible to all Team Members. The Code is not intended to replace our policies and procedures nor does it deal exhaustively with specific issues. Where there is a conflict between the Code and the relevant Company policy or procedure, the latter will apply.

To ensure that Team Members understand the Code and our expectations, all new Team Members are provided with the Code of Conduct within the booklet “Work Brighter with Beacon” that is included with every job offer. They are required to acknowledge their understanding and acceptance of the Code as part of their acceptance of a position with the Company.

Additional mandatory training in the expectations outlined in the Code is provided through our induction program, specific training modules on our e-learning platform and regular communications.

While Beacon Lighting will make every endeavour to ensure all Team Members have the knowledge and skills to fulfil their duties acting in accordance with the Code of Conduct, all Team Members have ultimate responsibility for ensuring that their own actions and decisions comply with the Code and with all relevant laws and regulations. Beacon Lighting will ensure that the systems and processes used in the workplace are compliant with the law, however a Team Member’s ignorance is no excuse for failing to abide by the law.

Team Members should complete all training offered by Beacon Lighting, read all required Company communications and attend all required meetings. They should also apply their own initiative to research and learn about the legal, moral, and ethical parameters in which they perform their roles. And when in doubt, ask for guidance from their manager or human resources department.

In summary, Team Members must always act:

- in a professional, fair and ethical manner, in accordance with our Company values
- in accordance with applicable legislation and regulations, and internal policies and procedures
- in a manner that protects the Company interests, reputation, property and resources.

The Code of Conduct is a discretionary document and is subject to change from time to time, having regard to the operational needs of the business. The Company reserves the right to make changes to the Code as required.