



**Beacon Lighting Group Limited**  
**ACN 164 122 785**

## **Modern Slavery Policy**



## 1. Introduction and Purpose

The Beacon Lighting Group understands the important role that the Group can play in respecting and promoting human rights and eradicating modern slavery. Modern slavery describes situations in which coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery can take many forms including slavery, servitude, forced labour debt bondage, deceptive recruiting for labour or services, child labour and forced marriage.

The Beacon Lighting Group Board and Senior Management have developed and are committed to this Modern Slavery Policy (**Policy**), which articulates the Group's commitment to respecting and promoting human rights and to addressing modern slavery risks in our operations and supply chains.

The Australian *Modern Slavery Act 2018 (Act)* took effect on 1 January 2019 and requires the Beacon Lighting Group to make annual public reports (Modern Slavery Statements) on the actions undertaken to assess and address modern slavery risks in their operations and supply chains.

## 2. Scope

This Modern Slavery Policy applies to:

- All Team Members (employees) throughout the Beacon Lighting Group and its controlled entities (**Group**) – this includes those working in full time, part time or casual capacities at all levels of the business, including senior executives.
- All persons providing services to the Beacon Lighting Group in any capacity including contractors and consultants (**Service Providers**) working within our business and / or on behalf of our business.
- All those who have a business relationship with the Beacon Lighting Group or any of its subsidiaries, including suppliers of goods and services (**Suppliers**) and their officers, employees, agents, and sub-contractors.
- Directors of the company including the Chief Executive Officer and Executive Chairman.

The philosophy of the Beacon Lighting Group is informed by the International Bill of Human Rights (which includes the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work), and the UN Guiding Principles on Business and Human Rights. The Group will continue to strive to have transparent operations and supply chains which comply with all aspects of the Act.



### **3. Commitments and Expectations**

#### **3.1 Commitments**

In line with the Beacon Lighting Group philosophy, values and informed by our pledge to uphold internationally recognised human rights, the Group is committed to:

- Identifying and addressing modern slavery risks which may occur in our operations.
- Conducting risk assessments to determine which parts of our operations and supply chains are at most material risk of modern slavery so that efforts can be focused on those areas.
- Meaningful engagement with our suppliers to determine which parts of our operations and supply chains are at most material risk of modern slavery so that efforts can be focused on those areas.
- Complying with all applicable laws.

#### **3.2 Expectations of Team Members**

In order to tackle modern slavery, the Beacon Lighting Group requires all Team Members to remain vigilant to the risks of modern slavery which may occur in all aspects of our operations and supply chains.

All Team Members must:

- Treat everyone in line with the Group Code of Conduct.
- Remain alert to any risks of modern slavery occurring in our operations and supply chains.
- Immediately report any suspected issues relating to modern slavery.

All Managers must:

- Respond appropriately if any modern slavery issue or risk is reported to them.
- Ensure that any person who believes they are a victim of modern slavery in our operations or a supply chain have the ability to make a complaint and have that grievance addressed and if appropriate remediated.
- Ensure that all Team Members, Service Providers and Suppliers with whom they deal are provided with a copy of this policy and are made aware of their responsibilities under it.



### **3.3 Expectations of Service Providers and Suppliers**

The Beacon Lighting Group expects our Service Providers and Suppliers to:

- Act in ways which are consistent with our philosophy and values.
- Establish appropriate systems to ensure that they can act in a way which is consistent with this Policy.
- Identify, assess, and disclose to the Beacon Lighting Group any actual or potential occurrence of modern slavery or any breach of a human right with which the Service Provider or Supplier may be involved or associated (either through its own operations or as a result of its business relationships).
- In the event that any actual or potential occurrence of modern slavery or breach of human rights is identified, take steps to rectify or mitigate it and immediately notify the Group of the steps taken.
- Adopt a similar policy to this Policy which incorporates provisions for the identification and eradication of modern slavery risks in its operations and supply chains.

## **4. Non-Compliance with this Policy**

Any non-compliance of this Policy by Team Members may lead to disciplinary action up to and including termination of employment.

Any non-compliance with this Policy by a Service Provider or Supplier will be regarded as a breach of contract with the Beacon Lighting Group and may result in the requirement to take corrective action and the suspension or termination of the contractual relationship.

Any non-compliance with this Policy by a Service Provider or Supplier must be notified to us immediately and we require all Service Providers or Suppliers to co-operate fully in any investigations or related processes which we may then initiate.

In all cases, the Beacon Lighting Group reserves the right to inform the relevant authorities.

## **5. Modern Slavery Risk Management**

The Beacon Lighting Group's approach to managing modern slavery risks in operations and supply chains will include the following activities:

- Mapping of the supply chains and undertaking a risk assessment to determine the most material modern slavery risks for the Group.
- An initial focus on the modern slavery risks associated with those suppliers that supply goods or services directly to the Group.
- The Group will assess suppliers through risk assessments and risk audits to confirm compliance with the Policy.



- Each Team Member with roles that are relevant to the policy will receive adequate training on the policy and any supporting processes applicable to their role.
- The Group will have an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery reporting which allows for confidential and anonymous reporting and provides protection from reprisal. There will also be a clear process for investigating and reporting on the issues raised through the reporting mechanism.
- Where it is identified that a supplier has breached the Policy, the Group will be committed to working with that supplier to remediate those breaches.
- The Group will establish a cross functional team responsible for modern slavery risk management. The team will report directly to the Beacon Lighting Group Board of Directors.
- The Group will provide modern slavery risk management transparency by preparing and publishing a Modern Slavery Statement each year.