



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

## **Supplier Code of Conduct**



## **1. Introduction**

The Beacon Lighting Group Limited (referred to as “the Group” or “Beacon Lighting”), consisting of Beacon Lighting stores, Beacon Trade, Beacon Commercial, Beacon International, Connected Light Solutions, Light Source Solutions, Custom Lighting and Masson For Light, is committed to sourcing its products in an ethical and sustainable way, and in doing so ensures that minimum standards concerning employment conditions, workplace conditions and management controls are adhered to and maintained across the supply chain.

## **2. Purpose**

The purpose of this Supplier Code of Conduct (referred to in this document as the “Code”) is to outline the Group’s minimum requirements and expectations of its suppliers with respect to the management of social and environmental risks in their organisations and supply chains.

## **3. Application**

This Code applies to all those who supply goods or services to the Group (“direct suppliers”) and to the network of suppliers utilised by those suppliers in connection with the goods or services supplied to the Group (“indirect suppliers”).

## **4. Our Expectations**

Beacon Lighting is passionate about bringing the latest, most exciting, and energy-efficient range of lights, ceiling fans, and lighting accessories to market for our retail, trade and wholesale customers. In doing so, Beacon Lighting will strive to partner only with suppliers who adhere to or exceed the minimum standards outlined in this Code. As the business relationship and partnership develops, our suppliers are expected to lift their standards and continually improve the working conditions in their organisations and supply chains.

Suppliers are responsible for monitoring and assessing ongoing compliance with this Code within their business operations and supply chains. All suppliers to the Group must accept responsibility for ongoing compliance with this Code as a part of their contractual arrangements with the Group, or as a part of their trading relationship with the Group.

The achievement of minimum standards may vary between suppliers depending upon the nature of their business. The Group recognises that some suppliers may need to work towards some of the minimum standards this Code requires. Beacon Lighting supports



continuous improvement and, where improvement is necessary, will work with suppliers in achieving compliance with this Code within an agreed timeframe. If a supplier is not able to commit to working towards and maintaining compliance with this Code, the Group reserves the right to terminate the contractual arrangement or trading relationship with the supplier.

## **5. Compliance with Laws**

Beacon Lighting respects and complies with internationally recognised human rights and expects the same from our suppliers, wherever they are operating. Beacon Lighting supports the Universal Declaration of Human Rights. The Group's minimum standards (set out below), with which all suppliers must comply, are aligned with internationally recognised human rights frameworks, including the Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) Conventions.

Beacon Lighting expects suppliers to, at all times, comply with all applicable laws and regulations, including employment, safety, anti-discrimination, anti-harassment, anti-bullying, environmental, consumer protection, competition, anti-bribery and corruption, anti-money laundering, and criminal laws applicable to the countries within which they operate.

All direct and indirect suppliers to the Group must, at all times, comply with all Australian State and Federal laws and all local laws in foreign jurisdictions relating to Modern Slavery, which, for the purposes of this Code, includes slavery, servitude, forced labour, people trafficking, the worst forms of child labour (where children are exploited through slavery like practices or exposed to hazardous work), forced marriage, debt bondage, deceptive recruiting for labour or services and harbouring victims. To the extent they apply to suppliers, these laws include modern slavery supply chain transparency laws.

Additionally, all direct and indirect suppliers must comply with all trade related sanctions laws.

Where the content of this Code conflicts with applicable country laws and regulations, a supplier should adopt a position that affords the greatest protection for workers and the environment.

Suppliers must ensure that they operate at all times in compliance with the minimum standards set out below and must take reasonable steps to ensure that their sub-contractors and all entities in their supply chains which are linked, directly or indirectly, to the provision of goods and services to Beacon Lighting, also comply with these minimum standards.



## **6. Minimum Standards: Employment Conditions**

Suppliers must ensure that the following minimum standards are satisfied in their operations and supply chains.

### **6.1 Child Labour**

- Suppliers must not use any form of child labour (except when undertaken pursuant to a lawful training or apprenticeship arrangement).
- Suppliers must comply with the minimum employment age limit defined by local law in the country in which the work is being performed or ILO Convention 138, whichever is higher.
- Suppliers must maintain or implement a system to verify the age of all employees to ensure no child labour is used.
- Suppliers must ensure that the health and safety of young workers (aged below 18 years of age) is carefully considered and protected, for example, suppliers must ensure that young workers are excluded from providing labour or services for any hazardous work and also must ensure that young workers do not work in excess of the maximum working hours set by applicable laws.

### **6.2 Forced, Bonded, Involuntary Labour**

- Employment must be freely chosen and be free from all forms of forced labour, bonded labour and human trafficking.
- Workers must always have access to their identity papers.
- Workers must always have freedom of movement and not be confined to a supplier's premises, dormitory, or provided housing.
- Workers must not be required to lodge any form of financial deposit and should be free to leave their employer upon the provision of the legally mandated notice period or, in the absence of that, a reasonable notice period.
- There must not be any deductions from a worker's wages to pay off debts (whether of the worker or someone else) or recruitment fees.

### **6.3 Harsh or Inhumane Treatment and Anti-Discrimination**

- No worker should be subject to any form of harsh or inhumane treatment, including physical, verbal or psychological abuse, the threat of such abuse, sexual or other harassment, or any form of intimidation.
- Every worker must be treated with respect and dignity.



- There should be no discrimination in any aspect of employment (including in hiring, compensation, access to training, promotion, termination or retirement) based on characteristics including country of birth, race, caste, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, or any other attribute protected by local anti-discrimination laws.

#### **6.4 Working Hours and Leave**

- Workers must only be required to work hours that are reasonable and that do not endanger their health and safety or the health and safety of anyone else.
- Overtime must be used reasonably, considering the worker's particular overtime/working hours history. Overtime should not be used to replace regular employment worked during ordinary working hours.
- Overtime must be voluntary, not excessive, not demanded regularly, and must be compensated as prescribed by local laws.
- Inclusive of overtime, workers must not work more than 72 hours in any seven days.
- Workers must receive at least one day off in every seven days or two days off every 14 days.
- Records of hours worked by all workers must be kept and maintained and must be accurate, complete, and transparent.

#### **6.5 Wages and Benefits**

- Workers' wages and benefits must meet all applicable local laws and industry practices.
- Wages must be paid regularly, directly, and on time.
- Workers must be provided with written contracts, in a language that each worker understands, with terms and conditions such as hours, rates of pay, overtime pay, benefits, and leave entitlements clearly documented.
- Workers must be granted and correctly compensated for paid leave, social entitlements, and insurance to meet all applicable local laws and industry practices.
- Suppliers must not make or threaten deductions from a worker's wages as a disciplinary measure.
- Deductions from wages may only occur with the written permission of the worker concerned and otherwise in compliance with applicable local laws.
- Workers should have complete control of any money earned.
- Outstanding payments upon termination will be paid in full no later than the next payroll date (or earlier if required by local laws).



## **6.6 Other Employment Conditions**

- All workers must be treated fairly, irrespective of whether they are local or migrant workers.
- Suppliers shall respect the right of workers to join or form trade unions and to bargain collectively.

## **7. Minimum Standards: Workplace Conditions**

Suppliers must ensure that the following minimum standards are satisfied in their operations and supply chains.

### **7.1 Health and Safety**

- Workers must be provided with a safe and hygienic working environment, considering the prevailing knowledge of the industry and any specific hazards.
- Suppliers must respect workers' rights to refuse work or remain in a building when they have reasonable justification to believe it is unsafe.
- Suppliers must take reasonable steps to prevent accidents and injuries occurring during work and/or in the workplace.
- Workers must receive adequate training, supervision, instruction, equipment, resourcing, and information to perform their jobs safely.
- Injury records must be kept and maintained, and all significant accidents or near misses must be reported and, where necessary, investigated. Corrective action should be performed to minimise re-occurrences.
- Where required by local laws, suppliers must provide compensation to all workers covering medical treatment for work-related accidents and compensation for work related accidents resulting in permanent disability.
- Suppliers must assign a senior management representative to be responsible for health and safety in their workplaces.

### **7.2 Facilities and Equipment**

- Suppliers must provide safe and dignified sanitation facilities for all workers.
- Suppliers must ensure workers have access to clean, potable water.
- Toilets must be well maintained and regularly cleaned. Workers must be provided with soap or hand wash, toilet doors must be lockable, and female workers must be provided with adequate and hygienic means for sanitary napkin disposal.
- Suppliers must ensure that appropriate personal protective safety equipment is



available and workers are trained to use the equipment.

- Safety guards on machinery must comply with or exceed minimum standards set by local laws.
- Risk areas such as dangerous machinery must be identified and effectively managed by providing applicable training and instructions to workers in their local language.
- Electrical equipment and wiring must be properly maintained and covered/insulated to prevent exposure to wires. Electrical control panels must be marked, easily accessible, and always unblocked.

### **7.3 Buildings**

- Where required by local laws, all buildings must have a valid Building Structure Safety Certificate or Permit confirming compliance with the relevant building code.
- All buildings must have an adequate number of unlocked, freely accessible, and marked exits for emergency evacuations.
- All buildings must have appropriately maintained firefighting and first aid equipment.
- Suppliers must communicate fire and emergency evacuation plans and post diagrams in the local language in various prominent locations around the building.
- Suppliers must conduct fire and emergency evacuation drills in compliance with local law requirements.
- All buildings must have a fire alarm system in place that is audible throughout the entire building. The system must be inspected regularly and tested in coordination with fire drills.
- Designated workers must be trained in fire safety, the use of fire extinguishers, administering fire prevention procedures, and emergency evacuation plans.

### **7.4 Accommodation**

- If a supplier provides accommodation facilities for its workers, the requirements regarding fire safety, cleanliness, and basic needs (as set out above) must also cover that accommodation.
- The accommodation must be separate from the workplace, be well-ventilated, be able to be adequately heated and cooled, and have a separate entrance.
- Workers must be free to move throughout their accommodation and leave the premises during their free time.
- Workers must be able to lock their accommodation and securely store their personal belongings.
- Each worker must have their own bed, and sleeping rooms should be a reasonable size, meeting ILO housing standard recommendations.



- There must be a reasonable number of operating toilets and showers that are clean and separated by gender. The number of toilets, showers, and wash basins should meet ILO hygiene recommendations.

## **8. Minimum Standards: Management Controls**

Suppliers must ensure that the following minimum standards are satisfied in their operations and supply chains.

### **8.1 Sub-contractors**

- Suppliers must keep and maintain transparent documentation and records regarding the use of any sub-contractors.
- At all times, suppliers must be able to advise Beacon Lighting where each of their products is produced or assembled, including sub-contracting assembly centres.
- Suppliers must ensure that all sub-contractors and third-party suppliers providing material or labour when manufacturing goods for Beacon Lighting comply with this Code.
- Suppliers must comply with any reasonable and lawful request by Beacon Lighting for that supplier to cease utilising a particular sub-contractor or third-party supplier.

### **8.2 Environment**

- Suppliers must comply with all relevant local and national environmental legislation.
- Where required by law, environmental records and certificates must be maintained for each workplace.
- Each supplier must have procedures in place to alert local environmental authorities in the event of accidental discharge of pollutants or any other environmental emergency.

### **8.3 Ethical Standards**

- Bribes, favours, benefits, or improper payments in cash or kind are strictly prohibited.
- Suppliers and service providers must demonstrate a high degree of professionalism and have a close affinity with Beacon Lightings' ethics.
- Honesty, fair dealings, and proper treatment of workers is required at all times.



## **9. Modern Slavery-Specific Requirements**

Suppliers must:

- not use or source materials or products tainted by Modern Slavery;
- adopt formal policies prohibiting Modern Slavery in their supply chains;
- train their staff (particularly those with procurement functions) about Modern Slavery and how to identify the risk of Modern Slavery occurring in their supply chains and the steps that can be taken to eradicate those risks;
- only use legitimate and reputable recruitment and labour supply agencies licensed under applicable laws;
- take all reasonable steps to ensure that all workers (regardless of their contractual status) who are in a Beacon Lighting supply chain and who are providing their services in places outside of Australia are given copies of this Code in their first language;
- take all reasonable steps to ensure that all workers (regardless of their contractual status) who are in a Beacon Lighting supply chain and who are providing their services in places outside of Australia, are provided with a genuine and safe process (with protection against retaliation) to complain to Beacon Lighting about the terms of their engagement or treatment; and
- put in place processes for the remediation of Modern Slavery in their supply chains including payment of appropriate compensation to any victims of Modern Slavery.

## **10. Self-Assessments**

In order to ensure compliance with this Code, Beacon Lighting may require a supplier to complete a self-assessment of its operations. At Beacon Lighting's discretion, it may extend or otherwise expand the self-assessment process and/or may require an independent audit to demonstrate compliance with all aspects of this Code.

## **11. Notification and Remediation Processes**

In the event of any actual or potential breach of this Code, Beacon Lighting requires the supplier to immediately notify it of the breach/potential breach and the steps to be undertaken to rectify or mitigate the breach. This notification must be in writing and must include the location, nature and extent of the non-compliance and whether any steps (and, if so, what steps) have been taken to address and remedy the non-compliance.



## **12. Non-Compliance with this Code**

Beacon Lighting is committed to working and supporting our suppliers who genuinely endeavour to comply with this Code. The Group is willing to work collaboratively with suppliers who may not yet meet the minimum standards, but are open to improvement and committed to correcting issues within agreed timeframes.

Failure to comply with this Code will be regarded as a breach of the supplier's contract with the Group and may give rise to a range of consequences, including suspension or termination of the supplier's contract, a claim for compensatory damages (subject to the terms of the supplier's contract) and/or the prevention of future business relationships between the Group and the supplier.

## **13. Whistleblower Protection Policy**

To support ongoing compliance with this Code, Beacon Lighting has established a Whistleblower Protection Policy that allows for confidential and anonymous reporting and provides protection from reprisal. The Whistleblower Protection Policy applies to our suppliers and those suppliers' workers. There are processes set out in that Policy for investigating and reporting on the issues raised through this reporting mechanism.

For further information about the Beacon Lighting Whistleblower Protection Policy, please refer to the Beacon Lighting Group investor website as follows:

[www.beaconlighting.com.au/investor-account/governance](http://www.beaconlighting.com.au/investor-account/governance)

## **14. Questions on this Code**

Any questions regarding this Code can be directed to the Beacon Lighting team at the following email address:

[supplierinfo@beaconlighting.com.au](mailto:supplierinfo@beaconlighting.com.au)

A copy of this Code can be found on the Beacon Lighting Group investor website as follows:

[www.beaconlighting.com.au/investor-account/governance](http://www.beaconlighting.com.au/investor-account/governance)