

INTRODUCTION

This Joint Modern Slavery Statement has been prepared in accordance with the Commonwealth Modern Slavery Act 2018. The Statement describes the risks of modern slavery in the operations and supply chains of the Beacon Lighting Group and includes information on the actions taken to address those risks for the financial year ending 27 June 2021 (FY2021). This Joint Modern Slavery Statement has been prepared by the Beacon Lighting Group Ltd, Beacon Lighting Corporation Pty Ltd and the Brightlite Unit Trust (the trustee of which is the Brightlite Nominees Pty Ltd), being the relevant reporting entities under the Act.

The Beacon Lighting Group understands the important role that the Group can play in respecting and promoting human rights and eradicating modern slavery. This statement covers all three reporting entities and each of the following businesses:















Modern slavery describes situations in which coercion, threats and / 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. In line with our philosophy and core values, minimising the risk of modern slavery in the operations and supply chains remain a critical focus for the Beacon Lighting Group.

The Modern Slavery Statement for FY2021 is the second Statement prepared by the Beacon Lighting Group. Throughout the financial year, the Group has established

new processes to complement the existing processes to assist managing modern slavery risks throughout the Group's operations and supply chains.

In the years ahead, the Beacon Lighting Group will focus on further enhancing and rolling out the modern slavery risk management strategy to further reduce the Group's exposure to modern slavery risks, as well as, working with suppliers to further reduce the risk of modern slavery in their supply chains.

STRUCTURE, OPERATIONS & SUPPLY CHAINS

Beacon Lighting is Australia's leading lighting supplier and an emerging wholesale supplier of lighting and energy efficient products to the commercial industry in Australia and other parts of the world. The relevant Beacon Lighting Group reporting entities under the Commonwealth Modern Slavery Act 2018 are:

- Beacon Lighting Group Ltd which is the publicly listed entity (ASX:BLX) for the Group which also employs a small number of executives.
- Beacon Lighting Corporation Pty Ltd which is the holding company for each of the unit trust entities within the Group.
- The Brightlite Unit Trust (the trustee of which is the Brightlite Nominees Pty Ltd) which is the main operating entity within Australia which includes the Beacon Lighting stores, Beacon Trade and Beacon Commercial.

At the end of FY2021, the Beacon Lighting Group operated the following trading businesses:

- 113 Beacon Lighting company stores
- 2 Beacon Lighting franchise stores
- 5 Beacon Lighting Commercial sales offices
- · Beacon International offices in Hong Kong, Germany, United States of America and China
- Light Source Solutions operating in Australia and New Zealand
- Connected Lighting Solutions
- Masson For Light
- Custom Lighting
- Beacon Lighting Wholesale

The Beacon Lighting Group has more than 1,100 team members with the majority of the team working in stores throughout Australia. The remaining team members in Australia are employed in two distribution centres in Derrimut (VIC) and Parkinson (QLD), the Store Support Centre (SSC) in Mulgrave (VIC) and the Commercial offices around Australia. Beacon Lighting also has team members working in Hong Kong, Germany, United States of America and China.

The Beacon Lighting Group also has a small number of contractors who are engaged for specific projects from time to time.

For further information about the Beacon Lighting Group structure, operations and corporate governance processes, please refer to the Beacon Lighting website as follows:

www.beaconlighting.com.au/investor

The Beacon Lighting Group's principal product categories are lights, fans, globes and energy efficient products. More than 95% of the products that are sold by Beacon Lighting are designed, developed, imported and distributed by the Group. Due to the vertically integrated supply structure of the Group and the long-term partnership with our suppliers, Beacon Lighting has a high level of visibility of our suppliers' operations and in turn their modern slavery risks.

The remaining products sold by the Beacon Lighting Group are purchased from overseas buying agents and to a lesser extent, direct from the factory. The Beacon Lighting Group also owns a small manufacturing factory in Australia. The majority of products purchased originate from manufacturing capabilities and supply chains in China.

The Beacon Lighting Group also purchase a diverse range of goods and services in order to operate our stores, distribution centres and offices. These goods and services include office suppliers, cleaning services, store development services and other services.

MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

For our Group operations where there is a risk that modern slavery could be evident, the Beacon Lighting Group has a robust suite of resources, policies and procedures as well as grievance channels and a whistleblowing channel to ensure that any potential risk of modern slavery can be identified and mitigated before the modern slavery risk can occur. Because of these processes and the engagement with our team members, the Beacon Lighting Group believes the risk of modern slavery in the Group operations is low. None the less, the Beacon Lighting Group will

continue to monitor and assess the risk of modern slavery in the Group operations going forward.

The Beacon Lighting Group has a diverse and extended supply chain through various regions and locations around the world. The Beacon Lighting Group supply chain extends beyond Australia, primarily into China, Taiwan, Europe, and the United States of America. The modern slavery risks in these regions include forced / bonded labour, deceptive recruiting, exploitation of migrant workers and underpayment of wages.

APPROACH TO MANAGING MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

The Beacon Lighting Group has implemented several strategies to minimise the modern slavery risks in the Group's operations and supply chains.

MODERN SLAVERY POLICY

The Beacon Lighting Group has, over the course of the reporting period covered by this Statement, developed and implemented a Modern Slavery Policy which articulates the Group's commitment to respecting and promoting human rights and to identifying and addressing modern slavery risks in our operations and supply chains. In the Policy, the Group commits to uphold internationally recognised human rights and to:

- Identify and address modern slavery risks which may occur in our operations and supply chains.
- Conduct risk assessments to determine which parts of our operations and supply chains are at risk of modern slavery so that efforts can be focused on those areas.
- Meaningfully engage with our suppliers to determine which parts of our supply chains are at most risk of modern slavery so that efforts can be focused on those areas.
- · Comply with all applicable laws.

The Modern Slavery Policy applies to all Group employees, contractors and consultants, suppliers and to anyone who has a business relationship with the Beacon Lighting Group. The Policy applies across the Beacon Lighting Group and specifically addresses our modern slavery commitments and our expectations of our employees and suppliers in the area of modern slavery. The Policy also clearly sets out our modern slavery risk management process and the potential consequences of noncompliance with the Policy.

It is expected that our suppliers will always act in a way that is consistent with our Policy and will also adopt a similar policy which incorporates provisions for the identification and eradication of modern slavery risks in their operations and supply chains. Any non-compliance with the Modern Slavery Policy will result in the Beacon Lighting Group working with the supplier to take corrective action. Where corrective action is not able to be achieved, the contractual relationship with the supplier may be suspended or terminated.

MAPPING OF THE SUPPLY CHAIN

The Beacon Lighting Group will undertake mapping of the supply chain and undertake a risk assessment to determine the most material risks to the Group. The initial focus will be on the modern slavery risks associated with tier one suppliers, that is, those suppliers that supply goods or services directly to the Group. For the most at-risk material suppliers, they will be asked to complete risk assessments and if necessary, risk audits to confirm compliance with our Modern Slavery Policy.

GOVERNANCE ARRANGEMENTS

The Beacon Lighting Group has established a cross functional team responsible for managing the modern slavery risks of the Group. This team will report directly to the Beacon Lighting Group Board of Directors. This team will also prepare the Modern Slavery Statement which will be approved by the Board each reporting period.

TRAINING

Each Beacon Lighting team member with roles that are relevant to the policy has or will receive training on the Modern Slavery Policy and any other processes applicable to their role.

WHISTLEBLOWER PROTECTION POLICY

The Beacon Lighting Group has an accessible and well-publicised reporting mechanism for concerns and disclosure in relation to modern slavery reporting which allows for confidential and anonymous reporting and provides protection from reprisal. There are clear processes for investigating and reporting on the issues raised through this reporting mechanism.

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

www.beaconlighting.com.au/investor-account/governance

MEASURING EFFECTIVENESS

The Beacon Lighting Group will have a focus on developing systems and processes to measure the effectiveness of the Modern Slavery Policy. Going forward, the Beacon Lighting Group has a goal of expanding the range of suppliers who will be the subject of risk assessments and risk audits. Where necessary, the Beacon Lighting Group will also work with our suppliers on implementing corrective actions.



PROGRESS DURING FY2021

During FY2021, the Beacon Lighting Group has undertaken several important initiatives associated with managing the modern slavery risks in the Group's operations and supply chains.

MODERN SLAVERY POLICY

As detailed above, the Beacon Lighting Group has developed a Modern Slavery Policy and this Policy was subsequently reviewed and approved by the Beacon Lighting Group Board of Directors.

For further information about the Beacon Lighting Group Modern Slavery Policy, please refer to the Beacon Lighting website as follows:

www.beaconlighting.com.au/investor-account/governance

MODERN SLAVERY POLICY TRAINING

The Beacon Lighting Group prepared Modern Slavery Policy Training material for all Team Members with procurement responsibilities within the Group and conducted training with them. The learning outcomes for the Modern Slavery Training were for the participants to gain an understanding of the following:

- What is modern slavery?
- Types of modern slavery.
- Overview of the Australian Modern Slavery Act 2018.
- Beacon Lighting Group's Modern Slavery Policy.
- Reporting of actual or potential occurrences of modern slavery.
- Modern slavery risk management.
- Modern slavery statement reporting.
- Supporting the Beacon Lighting Group risk management process.

Three separate Modern Slavery Policy training sessions were conducted. More than 30 Beacon Lighting Team Members completed the training.

MAPPING THE SUPPLY CHAINS

Over the course of the reporting period covered by this statement, all of the Beacon Lighting Group world-wide tier one supply chains were mapped by supplier, country of origin and industry type. Each supplier was then risk assessed based on the estimated prevalence of modern slavery in their country of origin and on their industry type. In this way, the Beacon Lighting Group was able to identify the most material modern slavery risks in our supply chain and identify the most relevant candidates for a modern slavery risk assessment.

MODERN SLAVERY RISK ASSESSMENTS

Several third-party risk assessments were reviewed and assessed in order to establish a modern slavery risk assessment questionnaire for the Beacon Lighting Group. The risk assessments for our suppliers focused on modern slavery within their organisations and supply chains.

Modern slavery risk assessments were conducted on tier one suppliers which make up more than 80% of the Beacon Lighting Group cost of sales. Based on the responses to the Modern Slavery Supplier Questionnaire, all assessed suppliers were approved to be a part of the supply chain for the supply of goods to the Beacon Lighting Group.

PROCESS OF CONSULTATION

In preparing this Joint Modern Slavery Statement, a process of consultation across the Beacon Lighting Group and its reporting entities has helped to prepare this Statement. All Beacon Lighting Group entities operate under a common set of governance policies, programs and management. This includes the programs through which modern slavery risks in operations and supply chains are assessed and managed. The process of consultation has included the engagement of the Executive Management Team and the Board of Directors within the Group.

IMPACT OF COVID-19 ON MODERN SLAVERY

The ongoing impact of the COVD-19 pandemic continues to present new modern slavery risks for the Beacon Lighting Group. In response to the pandemic, many governments enforced international border closures and restricted travel within internal borders. This has restricted the ability of the Beacon Lighting Group to travel and to meet and work with our suppliers. In response to this situation, the Beacon Lighting Group has undertaken the following initiatives:

- The Group has continued to honour all contracts and purchase orders that were raised prior to and during the COVID-19 pandemic.
- The Group has also utilised modern technology to have regular and direct communication meetings with our suppliers which has enabled Beacon Lighting to continue to support their operations.

Where possible, the Beacon Lighting Group China team and our Buying Agents in China and Taiwan have continued to visit and work with our suppliers.

CONCLUSION

The Beacon Lighting Group understands the importance of eliminating modern slavery and the role that the Group can play in eliminating this unacceptable practice from our operations and supply chains. Despite the significant work that has been done over the course of our two reporting periods, the Group recognises that it is still only at the start of a long journey. The Beacon Lighting Group is fully committed to playing our role. In the years ahead, the Beacon Lighting Group will focus on further enhancing and rolling out the modern slavery risk management strategy to further reduce the Group's exposure to modern slavery risks, as well as working with suppliers to further reduce the risk of modern slavery in their supply chains.

This statement was approved by the Board of Directors of the Beacon Lighting Group Ltd, Beacon Lighting Corporation Pty Ltd and Brightlite Unit Trust (the trustee of which is the Brightlite Nominees Pty Ltd) on November 25, 2021.

Glen Robinson

Chief Executive Officer
Beacon Lighting Group Ltd

Date of Signing: 25/11/2021

Glen Robinson

Chief Executive Officer Beacon Lighting Corporation Pty Ltd

Date of Signing: 25/11/2021

Glen Robinson

Chief Executive Officer
Brightlite Unit Trust
(the trustee of which is the
Brightlite Nominees Pty Ltd)

Date of Signing: 25/11/2021