

MODERN SLAVERY ACT MANDATORY REPORTING CRITERIA

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A MESSAGE FROM THE BEACON LIGHTING CHIEF EXECUTIVE OFFICER

The Beacon Lighting Group ('Group' or "Beacon Lighting') Limited is pleased to release our fifth Joint Modern Slavery Statement. This Statement reports on the activities undertaken in FY2024 in assessing and addressing the risk of modern slavery in our operations and supply chains.

As a purchaser of goods and services, Beacon Lighting understands the important role that the Group can play in respecting and promoting human rights and eradicating modern slavery. We are confident that there is no modern slavery in the Group's operations, and we continue to work on managing the risks associated with modern slavery in our supply chains. Beacon Lighting remains committed to expanding our modern slavery risk management strategies to increase our confidence in the goods and services we use in the Group or sell to our customers.

During FY2024, Beacon Lighting conducted modern slavery training, remapped our global supply chain, prepared a Supplier Code of Conduct Policy, continued to conduct modern slavery risk assessments with our

tier one and tier two suppliers, visited our key suppliers in China, and conducted independent factory audit for some of our most important suppliers. By the end of FY2024, approximately 92% of our tier-one risk-adjusted suppliers had been assessed by Beacon Lighting. We will continue to work with our suppliers to reduce the risk of modern slavery in their organisations and supply chains.

Please read this Beacon Lighting Modern Slavery Statement for FY2024 to get a greater understanding of our modern slavery reporting entities, structures, operations, supply chains, the risks, the actions taken to manage the risk of modern slavery, and the effectiveness of such actions. The Beacon Lighting Group remains committed to playing our part in reducing the risks of modern slavery in our supply chains.



Glen RobinsonChief Executive Officer
Beacon Lighting Group Limited

IDENTIFY THE REPORTING ENTITY

This Statement, pursuant to the Commonwealth Modern Slavery Act 2018 ('Act'), describes the risks of modern slavery in the operations and supply chains of the Beacon Lighting Group and includes information about the actions taken to address those risks for the 53 weeks ending 30 June 2024 (i.e. FY2024).

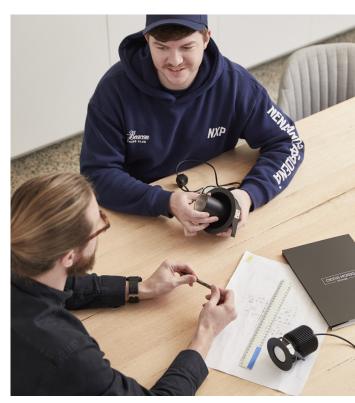
This is a Joint Modern Slavery Statement for the Group. The relevant reporting entities under the Act are:

- Beacon Lighting Group Limited (ABN 90 164 122 785), the publicly listed entity (ASX: BLX) for the Group, which only employs a small number of executives.
- Beacon Lighting Corporation Pty Ltd (ABN 56 083 125 446) is a non-trading entity and is the holding company for each of the unit trust entities within the Beacon Lighting Group.
- Brightlite Unit Trust (the trustee of which is Brightlite Nominees Pty Ltd) (ABN 13 322 464 749), which is the main operating entity within Australia, which includes the trading businesses of Beacon Lighting stores, Beacon Trade, Beacon Commercial, Connected Light Solutions, Masson For Light and Custom Lighting.

All Beacon Lighting Group entities operate under one set of governance policies, programs, and management. This Joint Modern Slavery Statement for FY2024 has been prepared for all the above reporting entities.

In line with our philosophy and core values, minimising the risk of modern slavery in our operations and supply chains will always be a critical focus for the Beacon Lighting Group.





DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

ABOUT BEACON LIGHTING

Beacon Lighting opened its first store in Prahran, Victoria in 1967. Since then, Beacon Lighting has grown to be Australia's leading retail, trade and online supplier of lighting, ceiling fans, and lighting accessories and an emerging wholesaler of ceiling fans worldwide. Beacon Lighting also owns 50% of the Large Format Property Fund, which owns seven retail properties in Australia.

Beacon Lighting's mission is "To light our customers' lives with exciting products that are environmentally friendly and fashionable, delivered with expertise and unparalleled service." Our core values are:



BE SUCCESSFUL

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

BE A TEAM PLAYER

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

BE RESPONSIBLE

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

BE ETHICAL

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

BE RESPECTFUL

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

BE CARING

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

BE A BEACON

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

For further information about the Beacon Lighting Group structure, operations, and corporate governance processes, please refer to the Beacon Lighting Group investor website. **www.beaconlighting.com.au/investor**

DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

BEACON LIGHTING'S REPORTING ENTITIES

The structure of the relevant Beacon Lighting reporting entities under the Act are presented as follows.

BEACON LIGHTING GROUP LIMITED

Publicly listed entity on the ASX

BEACON LIGHTING CORPORATION PTY LTD

Holding Company

BRIGHTLITE UNIT TRUST

Main trading entity in Australia



DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

BEACON LIGHTING'S OPERATIONS

By the end of FY2024, Beacon Lighting has trading businesses operating under the following brands:

















Some more specific details regarding the Beacon Lighting operating businesses at the end of FY2024 are presented as follows:

- 124 Beacon Lighting company retail and trade stores.
- 2 Beacon Lighting franchised retail and trade stores.
- 16 dedicated business websites, with the primary websites being www.beaconlighting.com.au and www.beacontrade.com.au
- 5 Commercial sales offices.
- Beacon International offices in Hong Kong, Germany, the United States of America, and China.
- Light Source Solutions operating in New Zealand.
- Connected Light Solutions.
- Masson for Light.
- Custom Lighting.
- Beacon Lighting Wholesale.

The trading businesses in Australia are supported by a supply chain with Beacon Lighting operated warehouses in Brisbane, Melbourne, and a third party logistics (3PL) warehouse in Perth. Internationally, Beacon Lighting has 3PL warehouses in New Zealand, China, Germany, and the United States of America. The Beacon Group Support Centre in Melbourne supports all trading businesses and their supply chains.

DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATION AND SUPPLY CHAIN OF THE REPORTING ENTITIES IT OWNS OR CONTROLS

BEACON LIGHTING'S TEAM

Beacon Lighting employs approximately 1,130 team members, with most of the team working in stores throughout Australia. The remaining team members in Australia are employed in the Brisbane and Melbourne warehouses and the Beacon Group Support Centre in Melbourne. Beacon Lighting also has a small number of team members working in New Zealand, Hong Kong, Germany, the United States of America, and China. Beacon Lighting also engages a small number of contractors. These contractors are primarily involved in warehouse operations to support the existing warehouse teams during peak trading periods or for specific Beacon Lighting projects.

BEACON LIGHTING'S SUPPLY CHAIN

The Beacon Lighting Group's principal product categories are energy-efficient lights, fans, globes, and lighting accessories. More than 95% of the products that Beacon Lighting sells are designed, developed, imported, and distributed by the Group.

Due to the Group's vertically integrated supply structure and our long-term partnerships with our product suppliers, Beacon Lighting has a high level of visibility of these suppliers, their operations, and, in turn, their risks of modern slavery.

Most of the products sold by the Beacon Lighting Group are purchased from overseas buying agents and, to a lesser extent, directly from the factory. Beacon Lighting also has a small manufacturing capability in Melbourne. Most of the products sold by the Group originate from manufacturing facilities and supply chains in China.

The Beacon Lighting Group also purchases diverse goods and services to operate our stores, warehouses, and offices. These goods include all the equipment for store fitouts, information technology, telecommunication equipment, and a wide range of everyday consumables. These services include cleaning, store development, marketing, legal, information technology, logistics, audit, and taxation services. All goods and services suppliers have been included in the Group's modern slavery risk management processes.



DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATION AND SUPPLY CHAIN OF THE REPORTING ENTITIES IT OWNS OR CONTROLS

MODERN SLAVERY

Modern slavery describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe severe exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may escalate into modern slavery if not addressed.

TYPES OF MODERN SLAVERY

Trafficking in Persons

Describes the recruitment, harbouring, and movement of a person for exploitation through modern slavery

Slavery

Describes a situation where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

Forced Marriage

Describes situations where coercion, threats, or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

Forced Labour

Describes situations where the victim is either not free to stop working or not free to leave their place of work.

Debt Bondage

Describes situations where the victim's services are pledged as security for a debt, and the debt is manifestly excessive, the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

Deceptive recruiting for labour and servicesDescribes situations where the victim is deceived, and their labour services are exploited as a result.

Worst forms of child labour

Describes situations where children are:

- Exploited through slavery or similar practices, or
- Engaged in hazardous work that may harm their health, safety morals, or
- Used to produce or traffic drugs.



DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATION AND SUPPLY CHAIN OF THE REPORTING ENTITIES IT OWNS OR CONTROLS

MODERN SLAVERY RISKS IN BEACON LIGHTING'S OPERATIONS

The Beacon Lighting Group employs over 1,130 full-time, part-time, and casual team members, primarily in Australia. It also has a small number of sales and sales support team members employed in New Zealand, China, Hong Kong, Germany, and the United States of America. The health, safety, and well-being of all our team members has always been the Beacon Lighting Group's number one priority.

After operating for over 50 years, Beacon Lighting has established supporting structures, policies, procedures, and benefits for all our team members. The Group has a high level of visibility and a strict culture of compliance with comprehensive reporting and grievance processes in all our operations. The risks of modern slavery within our operations are extremely low.

MODERN SLAVERY RISKS IN BEACON LIGHTING'S PRODUCT SUPPLIERS

As a retailer and wholesaler of energy-efficient lighting, fans, and lighting accessories, Beacon Lighting has a diverse and extended supply chain through various regions worldwide. The Beacon Lighting supply chains extend beyond Australia, primarily into China, but with some important suppliers in Taiwan and some small suppliers operating in Europe and the United States of America. Given that some of our suppliers are located in countries other than Australia, where modern slavery risks are more prevalent, some of the modern slavery risks in the Beacon Lighting supply chain include:

- Deceptive recruitment practices and trafficking of migrant workers.
- The use of debt binding and the withholding of identification and travel documents to restrict the ability of workers to move freely in and out of employment.

- The use of forced labour or child labour by direct or indirect suppliers in the assembly of products, parts, or the sourcing of raw materials.
- The exploitation of vulnerable workers such as ethnic minorities, low-skilled workers, and migrant workers.

Beacon Lighting has purchased lighting, fan, and lighting accessory products for over 50 years. Some of the current supplier relationships have existed for over 30 years. Over many years, assessments and visits to our product suppliers' factories by our executive team, buying team, buying agents, and other employees have provided Beacon Lighting with high visibility in their operations. Through our ongoing relationship and visibility of these product suppliers, Beacon Lighting assesses the risk of modern slavery amongst these suppliers to be low.

MODERN SLAVERY RISKS IN BEACON LIGHTING'S SERVICE SUPPLIERS

Most of the service suppliers used by Beacon Lighting are based in Australia. While the risk of modern slavery in Australia is relatively low compared to other parts of the world, it must be recognised that modern slavery exists in Australia. The risks of modern slavery in Australia are higher in industries that utilise low-skilled workers, young workers, migrant workers, and outsource work to sub-contractors. Due to the high level of visibility that the Group has into the operations of our Australian service suppliers, Beacon Lighting assesses the risk of modern slavery amongst these suppliers to be very low.

BEACON LIGHTING'S RISK MANAGEMENT STRATEGIES

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

MODERN SLAVERY POLICY

The Beacon Lighting Group has developed and implemented a Modern Slavery Policy, articulating the Group's commitment to respecting and promoting human rights and identifying and addressing modern slavery risks in our operations and supply chains. For a copy of the Modern Slavery Policy, please refer to the Beacon Lighting Group investor website as follows:

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

SUPPLIER CODE OF CONDUCT

The Beacon Lighting Group has established and published a Supplier Code of Conduct. The Code outlines the Group's minimum requirements and expectations of its suppliers with respect to the management of the social and environmental risks in their organisations and supply chains. For a copy of the Supplier Code of Conduct, please refer to the Beacon Lighting Group investor website as follows:

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

WHISTLEBLOWER PROTECTION POLICY

The Beacon Lighting Group has an accessible and well-publicised reporting mechanism for concerns and disclosures about modern slavery reporting, which allows for confidential and anonymous reporting and provides protection from reprisal. The Group Whistleblower Policy

is available to our team members, suppliers, business partners, and any interested third party. There are transparent 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 Group investor website as follows:

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

GOVERNANCE ARRANGEMENTS

The Beacon Lighting Group has established a crossfunctional team responsible for managing the Group's modern slavery risks. This team reports directly to the Beacon Lighting Board of Directors and prepares all the Modern Slavery Statements, which are reviewed and approved by the Board of Directors each reporting period.

MAPPING OF THE SUPPLY CHAINS

The Beacon Lighting Group has undertaken work to map the Group supply chains and to undertake a modern slavery risk weighting exercise to determine those suppliers with the most material risks to the Group. The Group's initial focus was on the modern slavery risks associated with tier-one suppliers, that is, those suppliers that supply products and services directly to Beacon Lighting. As the modern slavery risks associated with the most material tier-one suppliers have been assessed, the Group has now begun focusing on assessing tier-two suppliers, that is, the suppliers to our tier-one suppliers.

RISK ASSESSMENTS

Those suppliers with the highest modern slavery risk weightings have been asked to complete risk assessments. If necessary, independent audits are also conducted to confirm compliance with Beacon Lighting Group's Modern Slavery Policy. Initially, our suppliers completed self-assessed risk assessments. The Group has moved towards independent factory audits for some of our more critical risk-weighted suppliers.

REMEDIATION PROCESSES

The Beacon Lighting Group expects our suppliers to act in ways that are consistent with our values and our Modern Slavery Policy. In the event of an actual or potential occurrence of modern slavery or human rights breach, it is expected that our supplier will take immediate steps to rectify or mitigate the occurrence and notify the Group of the steps taken. It is also expected that all suppliers will cooperate fully in any investigations or related processes that Beacon Lighting may initiate.

Any non-compliance with the Beacon Lighting Group Modern Slavery Policy by a supplier will be regarded as a breach of contract with the Group and result in the requirement to take immediate corrective action, or it may result in the suspension or termination of the contractual relationship.

TRAINING

Each Beacon Lighting team member with an important procurement responsibility will receive training on the Beacon Lighting Modern Slavery Policy and associated risk management processes.

VISITING OUR SUPPLIERS

Beacon Lighting has a team based in China that provides purchasing and product engineering support to the rest of the Beacon Lighting Group. The China team visits our Chinese suppliers every month. In addition, the Australian executive and buying team are now traveling internationally and returned to visit our suppliers in person. This provides a high level of visibility and transparency of our supplier operations.



Throughout FY2024, the Beacon Lighting Group has undertaken important activities associated with managing modern slavery risks in the Group's operations and supply chains.

MODERN SLAVERY TRAINING

The Beacon Lighting Group has conducted Modern Slavery Training with team members who have important procurement responsibilities within the Group. The learning outcomes for the Modern Slavery Training were for 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.

Six separate Modern Slavery training sessions have now been conducted in FY2021, FY2022, FY2023, and FY2024. Over forty key Beacon Lighting team members with important procurement responsibilities have completed this training.

SUPPLIER CODE OF CONDUCT

During FY2024, the Beacon Lighting Modern Slavery team developed and published a Supplier Code of Conduct. The Code has been reviewed and approved by the Board and Director and has been published on the Beacon Lighting Group investor website as follows:

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

The Supplier Code of Conduct requires our suppliers to comply with all laws, maintain minimum employment and workplace conditions, and maintain minimum management controls.

MAPPING OF THE PRODUCT AND SERVICE SUPPLY CHAINS

Beacon Lighting has mapped the product and service supply chains to identify our most important tier-one suppliers. The AUD spend (including the translations of any foreign currency spend into AUD), the country of origin, and the industry were also noted for each supplier. The estimated prevalence of modern slavery by country from the Global Slavery Index 2018 was then applied to each supplier based on their country of origin. It was also noted that different industries have different modern slavery risk ratings, which were applied to each supplier. It was a combination of AUD spend, country risk rating, and industry risk rating, which determined the risk-adjusted modern slavery rating for each supplier.

The risk-adjusted modern slavery rating for all tier-one suppliers was then ranked from highest to lowest. The Group focused on suppliers representing the highest material risk of modern slavery for the Beacon Lighting Group. The suppliers with the highest risk-adjusted modern slavery rating included product and service suppliers. They included suppliers from China, Australia, the United States of America, and Europe. They also included industries such as manufacturing, logistics, building services, and marketing.

MODERN SLAVERY RISK SELF-ASSESSMENT

The tier-one suppliers with the highest risk-adjusted modern slavery rating were required to complete Modern Slavery Risk Self-Assessments. Where necessary, the Self Assessments were followed up to get further clarity on some of the responses. Overall, 92% of the Beacon Lighting Group tier-one suppliers with the highest risk-adjusted modern slavery rating have completed the Modern Slavery Risk Self Assessments in FY2021, FY2022, FY2023, and FY2024. The remaining 8% of tier-one suppliers will be monitored into the future, and should their risk-adjusted modern slavery rating increase, they may also be asked to complete the Modern Slavery Risk Self Assessments.

In FY2023 and FY2024, Beacon Lighting has extended the Modern Slavery Risk Self Assessments to tier-two suppliers. Some of the more important two-tier suppliers, based on their risk-adjusted modern slavery ratings, completed the Beacon Lighting Modern Slavery Risk Self-Assessments.

INDEPENDENT FACTORY AUDITS

For many years, Beacon Lighting has conducted independent audits on our suppliers' factories. Our fully owned subsidiary, Beacon Lighting Europe GmbH, sells Australian-designed products in Europe. In order to sell these products into Europe, the manufacturing factories in China must undertake an independent assessment under the Business Social Chain Initiative (BCSI) certification process. This independent factory audit includes an investigation into the modern slavery risks in these factories. In addition, some of our most important international customers require an independent factory audit before we supply them with any products.

In FY2024, Beacon Lighting conducted independent factory audits in relation to some of our highest risk-adjusted modern slavery-rated suppliers. Part of the audit focuses on the factories' focus (or lack of focus) on its social and environmental responsibility. The audited conditions include working conditions, compliance with local labour laws, ensuring that workers are voluntarily employed, rates of pay, and workers' rights. The independent factory audits help Beacon Lighting further reduce the risk of modern slavery in our supply chain.

VISITING OUR SUPPLIERS

Beacon Lighting has a permanent team based in China. An essential activity of the China team is to visit our Chinese suppliers every month to ensure that the product manufactured meets the Beacon Lighting specifications and that there are no signs of modern slavery risks in their operations.

The Beacon Lighting buying team, which includes several Australian Executives and Directors, is now making regular international buying trips to China and Hong Kong to visit our suppliers. All Executives and Directors have completed the Beacon Lighting modern slavery training and are vigilant for any sign of modern slavery. The process of visiting our suppliers on regular basis provides greater transparency of their operations and further reduces the risk of modern slavery in our supply chains.

DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS

The Beacon Lighting Group understands the importance of continually improving our modern slavery risk management strategies. This is best done by assessing the effectiveness of the actions taken within our operations and supply chains.

There is a heightened understanding of modern slavery risk management processes in our operations and supply chains. There is also a strong appreciation of the responsibility of managing modern slavery risks. As stated previously, six separate Modern Slavery Training Sessions have been conducted involving more than 40 key team members who have important procurement responsibilities. The Beacon Lighting team members have also been responsible for coordinating the completion of the Modern Slavery Risk Self-Assessments with their suppliers and following up on all queries as required. The training of the Beacon Lighting team and their involvement in the self-assessment process have shown that the modern slavery risk management strategies for Beacon Lighting have proven to be effective.

The Beacon Lighting Group has completed Modern Slavery Risk Self Assessments for 92% of tier-one suppliers with the highest risk adjustment modern slavery risk ratings. The risk assessment process has given our suppliers an understanding of Beacon Lighting's commitment to identifying and addressing modern slavery risks in our supply chains and has given them insights into the risks of modern slavery in their operations and supply chains. The Modern Slavery Risk Self Assessments have now extended beyond our tierone suppliers to include our most important tier-two suppliers. The Modern Slavery Risk Self-Assessment process has proven effective for our suppliers in educating them and helping them manage their modern slavery risks in their operations and supply chains.

The effectiveness of the Beacon Lighting modern slavery risk management processes can be illustrated by way of some comments made by one of our Australian suppliers when completing their Beacon Lighting Modern Slavery Risk Self-Assessment. Although the supplier in question is not legally required to submit a Modern Slavery Statement, they made the following comments: "as a result of Beacon (Lighting) bringing this issue to our attention, we have decided to immediately adopt a Modern Day Slavery Statement" and "We have also introduced a Modern Day Slavery Audit / Assessment for our existing suppliers and also apply it to any new suppliers". Beacon Lighting is pleased to have played a part in promoting human rights in and eradicating modern slavery from this supplier's operations and supply chains.



DESCRIBE THE PROCESS OF CONSULTATION ON THE DEVELOPMENT OF THE STATEMENT WITH ANY ENTITY IT OWNS OF CONTROLS

In preparing this Joint Modern Slavery Statement, the Beacon Lighting Group has undertaken a consultation process across all the relevant owned and controlled subsidiary entities regarding the implementation of our Modern Slavery Policy and in the development of this Modern Slavery Statement. Implementing the modern slavery management processes has involved team members throughout Beacon Lighting and included fully owned entities in Australia, Europe, China, and the United States of America. All Beacon Lighting Group entities operate under one set of governance policies, programs, and management. The consultation process has included the engagement of the Executive Management Team, Beacon Lighting team members with important procurement responsibilities, and the Beacon Lighting Group Board of Directors.

CONCLUSION

The Beacon Lighting Group understands the importance of eliminating modern slavery from our world and the role that Beacon Lighting can play in reducing the risk of this unacceptable practice from our operations and supply chains. Despite the important work already being done, Beacon Lighting recognises it still has much work to do. In the years ahead, the Beacon Lighting Group will focus on further enhancing and rolling out its modern slavery risk management strategy to further reduce the Group's risk of exposure to modern slavery, particularly in high-risk countries and throughout our supply chains. The Group is looking forward to working with our suppliers to reduce further the risk of modern slavery in their operations and their supply chains.

This statement was approved by the Board of Directors of the Beacon Lighting Group Limited, Beacon Lighting Corporation Pty Ltd, and the Brightlite Unit Trust (the trustee of which is the Brightlite Nominees Pty Ltd) on 10 October 2024.

Glen Robinson

Director Beacon Lighting Group Ltd

Director Beacon Lighting Corporation Pty Ltd

Director Brightlite Nominees Pty Ltd as trustee of the Brightlite Unit Trust

Date of Signing: 10/10/2024