

Lighthouse Engineering Pty Ltd

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MODERN SLAVERY STATEMENT FY2023-24



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1.1 Introduction- Lighthouse Engineering Pty. Ltd.

At Lighthouse Engineering, a privately owned fabrication company based in Wangara, Western Australia, we employ around 45 highly skilled professionals. Our extensive expertise in construction and steel fabrication enables us to deliver projects on time and within budget, with a strong emphasis on collaboration throughout the process.

Company Details



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Our commitment to building a sustainable future is anchored in strong, lasting relationships and guided by our core values in all interactions. We understand the importance of collaborating closely with our stakeholders and our responsibility as an industry leader in addressing human rights and modern slavery.

Our extensive capabilities and resources place us in a unique position, which comes with the responsibility to continuously improve our efforts to combat modern slavery.

We firmly believe that all human rights must be upheld, and it is essential to tackle any instances of modern slavery within our supply chain. Recognizing the insidious nature of modern slavery, which can be difficult to detect in supply chains beyond our immediate control, we adopt a risk-based approach to identify areas most vulnerable to such practices.

With this statement, Lighthouse Engineering outlines the proactive measures we are implementing to respect human rights throughout our operations and supply chain.

1.2 Approval

This statement has been created to meet the reporting requirements of the Modern Slavery Act 2018 (Commonwealth Act) for Australian entities. It is prepared for Lighthouse Engineering (ABN: 59156142979), a privately owned company. This Modern Slavery Statement was approved and signed by Basel Naser as the Sole Director of Lighthouse Engineering. The statement was approved on 02nd September 2024.



Basel Naser
Sole Director- Lighthouse Engineering Pty. Ltd.
Date: 02.09.2024

2.1. Our Structure

Lighthouse Engineering (privately owned company, ABN: 59156142979) is a leading fabricator of high-quality structural steel in Western Australia, operating from our state-of-the-art facility located at 48A Luisini Road, Wangara, WA. Our modern manufacturing environment is equipped with advanced technology and machinery, allowing us to meet the demands of various construction projects while maintaining the highest standards of quality and safety.



At Lighthouse Engineering, we pride ourselves on our skilled workforce of 45 skilled professionals, a team of dedicated professionals who are passionate about delivering exceptional fabrication services. Our employees bring a wealth of expertise and experience to every project, ensuring that we not only meet but exceed our clients' expectations.

Our operations involve close collaboration with a diverse range of stakeholders, including architects, engineers, and construction managers. We understand the importance of effective communication and teamwork in achieving successful outcomes. Additionally, we are committed to upholding human rights throughout our business activities, recognizing that ethical practices are essential to building trust and maintaining strong relationships with all our partners.

2.2 Our Operations

Lighthouse Engineering Pty Ltd specializes in designing, shaping, refining, and installing steel components for buildings throughout Western Australia and beyond. With over a decade of experience, we have established ourselves as a provider of cost-effective and reliable metalwork, offering both structural and architectural steel for a diverse range of construction projects.

Regardless of the project size, we are involved from the outset, utilizing our state-of-the-art engineering and fabrication operations. When it's time for installation, we ensure our high-quality steel is delivered on time and within budget. Lighthouse Engineering is having it's expertise in Structural fabrication, mechanical fabrication, mining and piping fabrication, etc.

Steel is a vital component in nearly every construction project, which is why our client base at Lighthouse Engineering is diverse. We have successfully completed a wide range of projects, including:

- **Airports:** Notably, the Perth International Airport Departures Expansion and Virgin Terminal.
- **Education:** Projects like the new boarding house at Guildford Grammar School.
- **Defence:** Infrastructure solutions for various defence-related projects.
- **Healthcare:** Steel structures for medical centers and facilities.
- **Commercial:** Large-scale developments in the commercial sector.
- **Hospitality:** Projects that enhance the hospitality industry.

Our experience spans across these industries, ensuring that we meet the unique needs of each client while delivering high-quality steel solutions and catering the Australia domestic market.

We prioritize quality, consistency, and reliability in the supply from our partners. By fostering long-term relationships with our suppliers, we ensure open and ongoing communication, which allows us to maintain high standards and adapt to any challenges that may arise.



3.1. Supply Chains

The main types of goods and services procured by the Lighthouse Engineering are Steel (Plates, bars, shapes and sections), labour hire and outsourced activities such as Coating and NDT services.

We engage with a network of suppliers and subcontractors essential for our operations within Australia. In the financial year ending 2023, most of Lighthouse Engineering's procurement expenditure was within Australia that includes procurement of steel and subcontracted services. We procure bulk of steels via our suppliers (e.g., BlueScope, Infrabuild, Southern Steel) based in Australia.

Australian suppliers including our subcontractors for outsourced services are subject to compliance to Australian laws that prohibit slavery practices. However, suppliers sourcing parts or components internationally may present a higher risk of modern slavery.

4.1 Modern Slavery Risks

At Lighthouse Engineering, we recognize that modern slavery risks can manifest in various ways within our operations and supply chains. To effectively address these risks, we have undertaken a thorough scoping exercise to identify and evaluate the potential areas of concern.

4.1.2 Understanding Our Operations and Supply Chain Structure

Lighthouse Engineering operates primarily in steel fabrication sectors, focusing on delivering high-quality structural steel for a variety of projects, including commercial buildings, educational institutions, and infrastructure developments. Our supply chain encompasses a range of suppliers providing raw materials, equipment, and services essential to our operations, bulk of it consists of steel and subcontracted services as outlined in 3.1.

4.1.3 Identifying High-Risk Sectors and Products

Certain sectors and products within our supply chain may involve heightened risks of modern slavery:

- **Sector Risks:** The construction and manufacturing sectors can present risks due to the nature of Labor involved, particularly in the context of subcontracting and third-party labour arrangements. Most of our procurement involves steel sourced from within Australia, along with subcontracted activities, which are also primarily outsourced locally.
- **Product and Service Risks:** Specific products and services we utilize, such as stationary, uniforms and information technology equipment, may have supply chains that involve high risks. As a responsible company, we source all our supplies from local suppliers that operate legally. However, we currently lack information regarding the manufacturing origins of these products and the processes involved in their production.
- **Geographic Risks:** While most of our procurement is conducted within Australia, we acknowledge that suppliers sourcing materials or components internationally may operate in jurisdictions with poor governance and weak Labor protections, increasing the potential for modern slavery practices.
- **Entity Risks:** We remain vigilant regarding the entities we engage with and thus we only use suppliers who are legally operates and registered under the legislation. Suppliers with poor governance structures or a history of Labor violations are of particular concern, as they may inadvertently incorporate modern slavery practices into their operations.

4.1.4 Assessing Visibility and Control

We have identified certain areas within our operations and supply chains where we lack full visibility, which could expose us to modern slavery risks. For example, while we conduct pre-qualification assessments of Labor hire companies to ensure compliance with employment laws, we recognize that we have less direct control over the terms of employment for these workers. This includes potential issues related to excessive working hours, underpayment, or other exploitative practices.

4.1.5 Commitment to Human Rights

Lighthouse Engineering is committed to identifying, assessing, and mitigating modern slavery risks as part of our broader commitment to human rights. We are dedicated to ensuring that our operations do not contribute to exploitation in any form. As of today, we have not received any complaints regarding modern slavery practices within our operations or supply chains.



5.1 Actions to mitigate the risk of Modern Slavery

At Lighthouse Engineering, we are committed to assessing and addressing the risks of modern slavery in our operations and supply chains. During the reporting period, we implemented several key actions:

- **Supplier Assessments:** We conduct thorough evaluations of our direct suppliers to ensure compliance with legal standards. We deal only with legally registered entities for our procurement.
- **Engagement with Key Suppliers:** We review the modern slavery statement of our steel suppliers to understand their approaches to managing modern slavery risks.
- **Raising awareness:** Raise awareness with inhouse stakeholders on modern slavery risks.

5.1.1 Supplier Modern Slavery Statements

During FY2023, Lighthouse Engineering executed several contracts for steel procurement. We checked that many of our suppliers prepared and submitted modern slavery statements to the Modern Slavery Register, confirming that they do not engage in any form of modern slavery within their operations or supply chains.

Lighthouse Engineering is committed to addressing modern slavery risks in our operations and supply chain. For this financial year onwards, we will collaborate with our suppliers and subcontractors to ensure they adhere to ethical practices and mitigate risks during supplier evaluation (PRC-004: Supplier Evaluation Form).

6.1 Measuring the Effectiveness of Actions taken

Being the first Modern Slavery Statement for Lighthouse Engineering, we will continue to work to address the issue of modern slavery and its effective measurement.

At Lighthouse Engineering, tackling modern slavery has become a core aspect of our operations. In FY2023, we concentrated on refining our strategies and assessing the effectiveness of our initiatives. As of today, we have not received any complaints regarding modern slavery practices within our operations or supply chains.

In FY2024, Lighthouse Engineering implemented several actions to address modern slavery risks effectively. Our supply chain assessment focused on identifying potential modern slavery risks among our major suppliers and contractors. Before issuing purchase orders, we ensure that new contracts include verification of the suppliers' modern slavery statements. Additionally, our team during yearly supplier evaluation, continuously monitors and conducts annual reviews of the effectiveness of our risk management measures, ensuring ongoing improvement and responsiveness in our approach.



7.1 Communication and Consultation

Lighthouse Engineering operates as a single reporting entity under the Act, making the mandatory reporting criteria 6 of Modern Slavery Act inapplicable to us. We recognize that the consultation and collaboration of all stakeholders—both internal and external—are crucial for effectively managing modern slavery risks. Extensive discussions regarding modern slavery have taken place within the organization, and we are committed to continuing this dialogue with our staff, suppliers, and clients to identify and address the modern slavery risks we face.

To enhance our efforts, we plan to adopt a supplier code of conduct, which will be supported by a Supplier Safety, Health, Environment, and Quality (SHEQ) and Modern Slavery questionnaire. This code of conduct and questionnaire will be distributed to all suppliers, and we will measure the effectiveness of these initiatives to ensure compliance and continuous improvement.



8.1 Training and Continuous improvement

Lighthouse Engineering is dedicated to raising awareness of modern slavery among our employees through regular training sessions and by informing them about our Modern Slavery Statement. This initiative ensures that our team understands the risks associated with modern slavery and the actions needed to mitigate these risks, thereby enhancing their ability to recognize and respond to such issues.

We will continue to follow up on supplier assessments and introduce modern slavery assessment criteria within our supplier compliance audits. Additionally, we are in the process of developing a supplier code of conduct and will maintain ongoing reviews and enhancements of our modern slavery prevention framework, along with associated policies and procedures. Lighthouse Engineering is committed to the continuous improvement of our policies and processes related to modern slavery.