

Quality Management System (QMS4)

To ensure the consistent delivery of high-quality solar lighting products and services that meet customer, statutory, and regulatory requirements.

Revision History

This Policy is reviewed at least annually as part of our Management Review to ensure its continuing suitability and alignment with company objectives.

Issue	Date	By	Description
QMS4	21/10/2025	MV	Updated with Endorsement and align with ISO 9001:2015
QMS3	21/06/2025	MV	Updated with Modern Slavery statement & LCA Accreditation; remove COVID
QMS2	08/04/2024	MV	Review & update
QMS1	09/01/2023	MV	Post-consultation release to "QMS" Series (for review Feb 2024)
	10/03/2022	NB	Full review and external benchmark for new release

Executive Endorsement

QMS4 Approved by:	
Name	Tristan Downs
Title	Director
Signature	
Date	21/10/2025
Version	QMS4
Next review date	October 2027

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The electronic copy is the controlled version.
Any printed copies are considered uncontrolled and may not reflect the latest approved revision

Scope & Purpose

This Quality Management System (QMS) defines the framework by which HIGHLUX ensures the consistent delivery of high-quality solar lighting products and services. It applies to all business units, operations, and employees of HIGHLUX Pty Ltd and supports compliance with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018.

HIGHLUX is committed to achieving and maintaining consistent quality of products and services through a purpose-built Quality Management System (QMS). Our QMS is based on the requirements of ISO9001 Quality Management, ISO14001 Environmental Management, and ISO45001 Occupational Health and Safety, and is customised to meet our company objectives, industry, and compliance requirements.

Our Company Values

HIGHLUX is committed to creating a globally competitive, responsible, renewable energy economy for Australia. Our core values drive our people and support our company goals.



Professional & Peer Recognition

HIGHLUX is professionally recognised and active within Australia's lighting industry. We are members of:

- Illumination Engineering Society of Australia and New Zealand (IESANZ)
- Lighting Council of Australia (LCA)

Our Director, **Tristan Downs**, has received multiple honours from the Lighting Council of Australia, including:

- Certificates of Appreciation in the category *LG-002 Lighting for Roads and Public Spaces* (2020 and 2021)
- Finalist, *2021 National Awards for Excellence in Lighting in Public Street Lighting and Outstanding Engagement with Industry*
- Recipient, *2023 Award for Outstanding Engagement with Industry* — the highest individual honour within the Australian lighting sector

In October 2025, HIGHLUX was a finalist at the *Lighting Council of Australia's Lighting Industry Excellence Awards 2025* in two categories:

- *Best Small Business*
- *Lighting Project Award* for our installation at *Clayton Community Space*

At the same event, our Lighting Designer and Product Developer, **Alex Huang**, won the *Young Achievers* category.

HIGHLUX has been accredited with the Lighting Council of Australia since 2025.

Quality Policy

HIGHLUX is committed to the delivery of commercial-grade quality outdoor lighting products and services for commercial, industrial, mining and government customers.

Our team is accountable for their service and products to meet or exceed contractual arrangements and, where our customers require, comply with AS/NZS Lighting Standards.

HIGHLUX selects and offers lighting solutions to suit each customer's need. Selection of solar solution is based on the most energy efficient option, as well as considerations to the customers budget, adherence to lighting standards, and any other compliance, aesthetic, or practical requirements.

HIGHLUX is dedicated to continuous improvement across all arms of its operations.

Our internal measures and procedures:

- Internal quality audits – quality review occurs as items are received into the production area, and before they are dispatched
- Warranty statement – minimum 5-year warranty on all products, warranty covers manufacturing, design and performance
- Product maintenance instructions – suggested annual maintenance for optimal performance
- Customer management system – captures customer communication and ensures key staff can access project information and updates at any time
- Daily team briefings – ensures all staff are across upcoming project milestones, customer communication, outstanding tasks, and team priorities.

Risk & Quality Planning

Risks and opportunities are identified through internal audits, project reviews, and daily team briefings. Risk controls are documented within project plans and reviewed during management meetings to ensure appropriate mitigation actions are in place.

Communication & Competence

HIGHLUX ensures effective communication across all functions through daily briefings, project meetings, and the customer management system. Staff competence is maintained through on-the-job training, supervision, and formal development activities in accordance with ISO 9001 Clause 7.2.

Performance & Review

Performance is measured through warranty data, customer feedback, audit results, and project milestone tracking. Management reviews are conducted annually to evaluate QMS effectiveness and to implement corrective and preventive actions.

Continuous Improvement

HIGHLUX drives continual improvement through lessons learned, innovation feedback from AUSLITE, and actions identified in internal audits and reviews. Improvement actions are documented and monitored until completion.

Supporting Policies (Appendix A)

Modern Slavery Commitment & Monitoring

Environmental Impact Statement

Occupational Health & Safety Policy

Safe Work Method Statement

Privacy & Data Protection Statement

Modern Slavery Commitment & Monitoring

HIGHLUX is committed to ethical sourcing and ensuring modern slavery, forced labour, and human trafficking are not present in our operations and supply chains. To support this commitment, the following practices are embedded in our quality system:

- We maintain direct relationships with all Tier 1 manufacturers and key component suppliers
- Our director and senior team members conduct annual site visits to manufacturing facilities in Australia and China; visits include:
 - Walkthrough inspections of factory floor and workspaces
 - Face-to-face meetings with management and production staff
 - Visual verification of safe and lawful working conditions
- Where practicable, we also visit upstream suppliers (our suppliers' suppliers) to assess conditions further up the supply chain
- We engage only with suppliers who demonstrate compliance and are recognised in our industry to operate with fair labour standards and who align with our values on safety, transparency and voluntary employment.
- Processes are reviewed annually as part of our Quality Management System review cycle

Environmental Impact Statement

HIGHLUX is committed to providing quality public lighting powered by solar energy, with minimal disruption to the local ecosystem. HIGHLUX has a separate Environmental Policy in addition to this Environmental Impact Statement.

HIGHLUX recognises well-selected public lighting can make a significant contribution to how public space is used on balance with impact on the environment. Creating safe public spaces can enhance the human experience through interaction with each other, as well as regular exposure to the natural elements.

HIGHLUX complies with and maintains a strong working knowledge of public programs and policies, including local, state, and federal legislation, for renewable and non-renewable energies, for recycling standards for business and workplace health and safety. To improve our environmental performance, we:

- Invest in local manufacturing, business, and technical expertise for a range of solar components and systems
- Adopt and use solar solutions where mains powered options were going to be impractical, costly, unnecessarily environmentally disruptive and at higher risk to worker safety
- Work with customers to test prototypes toward the most efficient and effective combination of solar components for a specified lighting output
- Develop and promote lighting products and solutions to improve safety, amenity, and the enjoyment of our urban environment while minimising impact on natural surrounds
- Encourage the recycling of materials and the minimisation of waste and non-renewable energy
- Co-operate and join with the appropriate authorities and technical organisations in the formulation of standards and policies that are in line with providing lighting that reduces impact on the environment
- Re-use packaging we have received to package our customer's products

Our internal measures and procedures consistent with our environmental policy:

- Lowest environmental impact installation products for our solar lights – the use of Surefoot Footings over traditional cage foundation (where the soil conditions allow), and use of the 6m swing pole over a fixed pole for our SOLANOVA as standard which reduces the requirement for a cherry picker for maintenance of the lights.
- Elimination of plastic packaging – our products' packaging has been designed without the use of plastics, and, where possible, are packaged using recyclable materials including re-used packaging
- Environmentally safe cleaning products – for our work environment including workshop and office
- Product innovation, research, and development – we consistently engage in research and development to improve our product efficiency, longevity, and waste reduction.



Occupational Health & Safety Policy

HIGHLUX provides a safe work environment for all staff and the commitment to health and safety is a team effort.

Our work environment complies with the guidelines of the Occupational Health & Safety Act 2004. We provide and maintain a working environment that is safe and without risks to health by:

- Maintaining the workplace in a safe and healthy condition
- Access and visibility of First Aid kits in the shared area of the main office as well as in the work vehicle with accompanying Incident Report Form
- Providing and maintaining safe tools and systems of work
- Providing our sub-contractors with safe products that can be installed in a safe manner
- Making and monitoring arrangements for the safe use, handling, storage, and transport of products
- Providing adequate facilities to protect the welfare of all employees, and provide information, training, and supervision for all employees, enabling them to work in a safe and healthy manner.

HIGHLUX management is committed to consultation with employees to ensure that our OH&S policy operates effectively, including regular reviews of our policy and procedures. A duty of care is expected from employees to protect their own health and safety and others who may be affected by their actions at work.

We're a pet friendly workplace and HIGHLUX employees are welcome to bring their pets to work every day for our collective mental health, provided all employees are completely comfortable with the arrangement. Animals are not allowed in the workshop. Owners are responsible for the behaviour of their pet.

Our internal measures and procedures:

- Workshop organisation and methods – to maintain a safe work environment
- Weekly OH&S update – as part of our schedule of team meetings

Safe Work Method Statement

HIGHLUX is committed to ensuring any on-site work is performed safely and any associated risks are identified and mitigated before staff arrive on site.

For any on-site work, a Safe Work Method Statement (SWMS) is completed, reviewed, and recorded. Before any work begins on site, all parties are briefed on the task, responsibilities, expectations and intended workflow as outlined in the SWMS, and each staff on site are to sign off on the SWMS. At any time on site, work that is not being undertaken in accordance with the SWMS will be stopped immediately, work practice reviewed, and work can resume as soon as it is deemed safe to do so. Any variation to the workflow is recorded by the senior staff member on site on the SWMS. On job completion, all parties are to sign off on the SWMS and amendments scanned and saved in the project folder.

Risk is identified using the following hazard ratings system:

SWMS - HAZARD RATINGS SYSTEM

Level	Description of Consequence or Impact	Consequence	Likelihood / Probability – 12 Month Period				
			A. Almost Certain	B. Likely	C. Possible	D. Unlikely	E. Rare
1. Extraordinary	Major incident involving fatalities or permanent disability, environmental disaster, bankruptcy, shareholder losses, public image. An environmental impact that is severe and likely to spread beyond the immediate site and will remain a serious problem over a prolonged period.	1.Extraordinary	1	2	4	7	11
2. Major	Extensive and severe risk of economic and financial loss, legal or industrial action, serious injury or disease to facility's staff or the general public. An environmental impact that is severe and likely to impact beyond the immediate site and remain a problem in the medium term.	2. Major	3	5	8	12	16
3. Moderate	Medical treatment required, loss of production capability, off-site releases with no detrimental effects, medium financial loss, environmental impact that may be significant. Environmental impact will be localised and have short term effects.	3. Moderate	6	9	13	17	20
4. Minor	First aid treatment required, on-site release immediately contained, minor financial loss, a minor and transient environmental impact.	4. Minor	10	14	18	21	23
5. Insignificant	No injuries, low or zero financial loss, no environmental impact occurring.	5. Insignificant	15	19	22	24	25
Level	Likelihood / Probability						
A. Almost Certain	The event/impact is common and expected to occur in most circumstances						
B. Likely	The event/impact has happened before and will probably occur again						
C. Possible	This event/impact could occur at some time						
D. Unlikely	This event/impact is not likely to occur						
E. Rare	This event/impact may occur in exceptional circumstances only						

Privacy & Data Protection Statement

HIGHLUX will only collect personal information which is necessary for the purpose of conducting business.

Customer information will not be shared, sold, or given to any external third parties. We will only share customer information within our own trading entities to reasonably conduct business. We will take all reasonable steps to keep any customer information protected from loss, misuse or unauthorised access, modification, or disclosure.

We do not send unsolicited emails to customers or suppliers. We may, in the future, request permission from customers and suppliers to periodically send company information relevant to them, but this will not occur without informed consent from the email holder.

At any time, our customers can request access to any personal information we may hold (as allowed by the Privacy Act 1988).