



THE STAR

The Star Entertainment Group

CODE OF CONDUCT

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FOREWORD

The Star Entertainment Group Limited (SGR) stands for high quality, local experiences. Our commitment is to create memorable experiences for all our guests. We have a world class product of which you can all be proud.

We are a respected part of the economic and social fabric of the communities in which we operate. We have achieved this by investing in superior facilities and talented people and by being ethical and professional in all that we do.

This hard-earned reputation is a result of a focused effort to establish and maintain the principles and behaviours described in this Code. The careless or improper actions of just one employee can seriously damage our reputation as a good corporate citizen.

Our Code of Conduct Guiding Principles are designed to give clear direction to enable us all to make decisions in line with what is expected by SGR, especially in those situations where the right choice is not easy or obvious.

Every employee must comply with all applicable laws while working for SGR. SGR will forgo any business dealing that relies on a violation of the law of any country. No person in the company is authorised to give any instruction to the contrary.

This Code is supported by a consistent set of policies, procedures and guidelines designed to empower all employees to make informed decisions every day.

We encourage all employees to feel confident to report any unlawful activity, corruption, theft, fraud, or wilful breaches of this Code. No employee will be disadvantaged in any way because they acted in good faith to report a potential violation of the Code.

We all have an important role to play in maintaining a positive and professional workplace culture, one which evokes pride and loyalty from all our stakeholders.

Please take the time to read and understand the Code and make a personal commitment to implement it in all areas of your work.

1. PURPOSE

The Star Entertainment Group (SGR) adheres to high ethical and legal standards. The purpose of this Code of Conduct (Code) is to articulate the behaviours expected of our employees in the course of performing their duties of employment. It sets out the guiding principles which shape the way decisions should be made and how we perform our duties in the best interests of SGR. By adhering to these principles, we build trust and confidence among our stakeholders – which include our guests, our business partners, regulatory authorities, local communities and, importantly, our fellow team members.

The Code has been approved by SGR's Board of Directors.

2. SCOPE

This Code applies to everyone who performs work for and on behalf of SGR inclusive of all Directors, employees, contractors and labour hire firms (our employees).

3. THE CODE GUIDING PRINCIPLES

The **Code guiding principles** describe the core elements of the behavioural standard SGR has set for itself and the behaviours expected by SGR of its employees. The Code guiding principles are as follows:

1. **We Respect the Community**
2. **We Are Diverse**
3. **We Comply with the Law**
4. **We are Ethical**
5. **We are Professional**
6. **We Work Safely**

4. THE CODE

4.1 We Respect the Community

We are a good corporate citizen and conduct our business in a manner that respects the community, protects the environment and seeks to prevent anti-social behaviour and illegal or undesirable activity (IUA) on, or in the vicinity of, the properties we operate.

SGR will respect the community by:

- maintaining and promoting a Responsible Service of Alcohol (RSA) program
- maintaining and promoting a Responsible Gaming (RG) program
- maintaining and promoting a Corporate Responsibility program.

Our employees will respect the community by:

- serving alcohol responsibly in compliance with SGR's RSA program
- providing a responsible service of gaming in compliance with SGR's RG program
- maintaining (where appropriate) an RSA licence
- reporting all incidents affecting the health, safety or security of SGR's guests, employees, and assets.

4.2 We Are Diverse

We provide an inclusive environment in which everyone is treated fairly and with respect. Our policies, procedures, work conditions and practices are designed to combat direct and indirect discrimination.

SGR encourages diversity by:

- developing strategies, initiatives and programs to promote diversity
- engaging with the community in projects supportive of diversity
- establishing measurable diversity objectives and reporting progress toward achievement of those objectives.

Our employees demonstrate diversity by:

- behaving in a manner that is inclusive and welcoming
- respecting the diverse cultural, social and religious beliefs and backgrounds of the community, our guests and our fellow SGR employees
- speaking out when actions or behaviours of guests or fellow SGR employees are offensive, abusive or disrespectful
- complying with relevant SGR policies including policies relating to equal employment opportunity, discrimination, harassment and workplace bullying.

4.3 We Comply with the Law

We comply with our legal and regulatory obligations, voluntary commitments, industry standards and company policies and procedures. In doing so, we protect the interests of the company, the community, our guests and our employees.

SGR will help our employees comply with the law by:

- providing all employees with training appropriate to their role
- making readily available to employees all appropriate rules, policies and procedures
- maintaining procedures to identify and communicate material changes to legal and regulatory obligations, voluntary commitments, industry standards or company policies and procedures which may affect employees
- maintaining all licences required for the operation of the business.

Our employees will comply with the law by:

- understanding the legal obligations specific to their job role
- observing all laws, regulations and standards governing the jurisdictions in which we operate
- following the policies, procedures and processes designed in support of our legal obligations
- immediately reporting any suspicion of unlawful actions
- reporting breaches of policies, laws, rules and standards
- maintaining all required licences for the conduct of duties
- reporting illegal and undesirable activities including but not limited to money laundering, lending, loan sharking, the taking, dealing or possession of drugs and prostitution
- reporting in accordance with Anti-Money Laundering and Counter Terrorism Funding practices (AML-CTF).

4.4 We are Ethical

We conduct our business with honesty and integrity as this is the basis for maintaining our reputation.

SGR will demonstrate ethical behaviour by:

- honouring our contractual obligations
- dealing fairly with our employees, our guests, and our suppliers
- having in place a Code of Conduct and other appropriate policies and procedures so employees know what is expected of them
- providing effective leadership and segregation of duties to prevent fraud and other dishonest behaviour
- maintaining a Whistleblower Policy and providing an independent avenue for the reporting of suspected unethical or illegal dealings
- conducting our business in a manner compliant with all applicable laws.

Our employees are expected to:

- act honestly and with high standards of personal integrity
- use SGR property only in the context of work and not for personal gain or to the detriment of SGR or its guests
- safeguard SGR's assets, including physical assets and intellectual property rights
- seek management approval before engaging in activities which may be perceived as creating a conflict of interest
- disclose all conflicts of interest
- not engage in activities which gain or attempt to gain advantage through deception, theft, or collusion
- refrain from behaviours which could bring SGR into disrepute
- only accept tips or gifts if permitted by our role and report these in accordance with SGR's policies on tips and gifts
- challenge and report unethical behaviours or practises
- assist investigations into potentially unlawful events as required
- provide complete, honest and accurate information to any regulator who lawfully requests information.

4.5 We are Professional

We take ownership of our actions and aim for excellence in everything we do.

SGR will show professionalism by:

- treating all SGR employees with respect
- promoting collaborative and collegial workplaces
- providing secure locations for the storage of confidential information
- providing training and development opportunities for SGR employees to improve skills and pathways for career development.

Our employees are professional when they:

- work within the requirements of their employment contract and follow all lawful and reasonable directives that are within their capability and training
- maintain and improve the skills necessary for the proper performance of their job roles, including timely completion of all mandatory training requirements
- are polite and respectful in their dealings with other people – including guests, suppliers, fellow employees and regulatory authorities
- use social media responsibly and legally and in accordance with SGR’s policies
- make decisions within the scope of their delegated authority
- immediately inform SGR if they are arrested, charged or convicted of any offence that could be relevant to their employment or licence
- are not in possession of or affected by illegal drugs or illicit substances while on SGR premises
- work consistently within SGR service standards, policies and procedures
- conduct themselves in a manner which is fair and inclusive.

4.6 We Work Safely

We keep our properties healthy, safe and secure so our employees can return home safely at the end of each working day and our guests can enjoy their time with us.

SGR will keep its employees and guests safe by:

- providing safe and inclusive workplaces
- implementing a risk management framework relating to safe work practises so that safety issues can be promptly identified, assessed and managed
- provide employees with training, instruction and information about safe working practices
- providing programs to promote the health and wellbeing of employees and guests.

Our employees are expected to:

- following safe work procedures
- immediately reporting unsafe work practises
- immediately reporting unsafe areas, equipment or hazards
- using appropriate safety equipment in carrying out the duties of employment
- complying with all reasonable directives relating to the safety of guests and employees
- understanding their individual responsibility for working safely
- undertaking their duties free from the influence of alcohol or other intoxicants.

5. COMPLYING WITH THE CODE

5.1 Reporting Breaches of the Code

Each of us has a responsibility to comply with the Code. Each of us also has a responsibility to report actual or suspected breaches of the Code.

If you become aware of, or have reason to suspect that, an employee has, or may have, breached the Code by engaging in any misconduct, or illegal or undesirable activities, or otherwise acting contrary to the requirements of the Code, you should report the matter as follows:

- Report the matter to your immediate leader
- If the matter to be reported concerns your immediate leader, or if you are not satisfied that your immediate leader would treat your concerns with appropriate seriousness, report the matter to your People & Performance team or to the Executive General Manager of the business area you work in
- Report the matter to any member of SGR's Ethics Panel (refer section 6 below)
- Report the matter through SGR's secure whistle-blower service e-TIPS.

EMAIL etips@etika.com.au TELEPHONE **1800 499 114** a free call within Australia

You can also contact the Investigations Department to make a report by telephone or email. The Investigations Department treats all matters with as much confidentiality as is possible although SGR may have a legal obligation to disclose the information (eg to law enforcement agencies) in certain circumstances.

5.2 Co-operating with Investigations

The Investigations Department may request that you participate in an interview if they consider that you may have information relevant to a matter being investigated. Employees are required to participate in, and to co-operate fully during, such interviews including providing full disclosure of any information relevant to the investigation. Employees are also required to comply with all other reasonable requests relevant to the investigation, including making available devices or files on which information may be stored and providing access to areas where the Investigations Department reasonably consider that relevant information, devices or files may be stored.

Employees are not entitled to bring a representative or witness to interviews with the Investigations Department.

At the conclusion of an investigation, the Investigations Department may provide relevant information to SGR's People & Performance team for consideration of any further action that may be appropriate including (but not limited to) conducting its own additional enquiries, interviewing relevant employees, and determining any disciplinary action that may be required in the circumstances.

6. ADMINISTRATION OF THE CODE

The Ethics Panel is responsible for administration of this Code.

The Ethics Panel comprises:

- Group General Counsel & Company Secretary,
- Chief Risk Officer,
- Chief People & Performance Officer,
- Group Investigations Manager
- an independent person with expertise in ethical conduct.

Details of the members of the Ethics Panel are set out in **Appendix A**.

In administering this Code, the Ethics Panel is responsible for:

- Reviewing the effectiveness of the Code and recommending any changes to the People, Culture and Social Responsibility Committee of the Board

- Putting in place procedures for dissemination of, and monitoring compliance with, the Code
- Investigating alleged breaches of the Code and
- Reporting breaches of the Code to the People, Culture and Social Responsibility Committee.

The Ethics Panel will review this Code no less frequently than every two years and recommend to the People, Culture and Social Responsibility Committee any changes it thinks are necessary to promote a workplace culture consistent with the objectives of the Code.

Changes to the Code must be approved by the Board.

APPENDIX A – ETHICS PANEL CONTACT INFORMATION

Position	Name
Independent Consultant	Susan Cunningham
Group Investigations Manager	Kevin Houlihan
Chief People & Performance Officer	Kim Lee
Group General Counsel & Company Secretary	Paula Martin
Chief Risk Officer	Paul McWilliams