

# Code of Conduct

**NOTE:**

All amendments to this policy must be authorised by the Policy Owner and notified to the Casino Regulator within 7 days of approval.

Contact Group Compliance at [complianceseg@star.com.au](mailto:complianceseg@star.com.au) for further details

**Policy Details**

**Policy Owner**

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## TABLE OF CONTENTS

Our Strategic North Star	3
Message from the Executive Chair	4
01 Our Code of Conduct	5
02 Speaking Up	6
03 Our Purpose, Values & Principles	7
04 Lead with Integrity	8
05 Own It	9
06 Build Memorable Connections	10
07 Take Good Care	11
08 Breaches of the Code	12

# THE STAR

Version	Amended by	Reason for change	Details of changes	Date
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2.0	P&P	Minor Enhancements	N/A	29 June 2021
3.0	Compliance	Update to WB	WB Services contact info updated	27 February 2023
4.0	Compliance	Update to reflect language provided by L&G NSW	Minor enhancements to reflect language	18 April 2023
5.0	Compliance	Update to reflect new PVPs	Code updated to anchor behaviours to new PVPs	27 March 2024

## Our Strategic North Star

Our Strategic North Star aims to help us understand what we are aiming to achieve. It will help us deliver **sustainable outcomes** for our guests, our team members, the communities in which we exist and our shareholders, by providing **entertainment, gaming, and leisure experiences** in a **safe, responsible, and ethical way**. We will do this by embedding our values to lead the organisation with a focus on safer gambling and good business practices.

Our strategy provides four pillars for our rebuild. Our success will be underpinned by aligning our mindsets and practices.

1. **Sustainable** outcomes – we are a business that understands and respects obligations, regulations, and compliance. We strive to find safer methods of play, look for new products for our guests, provide a positive contribution to our communities and maintain profitability.
2. **Entertainment, gaming and leisure experiences** – our guest proposition. It's what we love to offer and what we want to be known for, it's why our guests continue to return.
3. **Safe and responsible** – we recognise, assess, and mitigate the risks associated with our products and services and in particular, minimise harm through our Safer Gambling strategy.
4. **Ethical** – making the right decisions when it isn't quite clear. Our culture will be underpinned by an ethical mindset where people will consistently evaluate whether our actions align with both the possibilities ('could we?') and the ethical considerations ('should we?').

## Message from the Executive Chair

Dear Team Member,

At The Star Entertainment Group Limited (**The Star**) we strive to provide high quality, local experiences that we can all be proud of. We are committed to driving our purpose of Creating Fun at Trusted Destinations for all our guests and to be a valued contributor in the communities in which we operate.

We know to achieve our aspiration we must regain the trust of the community by being ethical and professional in all that we do and operating with the highest integrity. This will require us all to have a singular focus on establishing and maintaining the values and behaviours described in this Code.

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

Each one of us must comply with all applicable laws while working for The Star. The Star will forgo any business dealing that relies on a violation of any laws applicable to us. 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.

The management and operation of our casinos is resilient and free from criminal influence or exploitation. We encourage all team members to feel confident to report any unlawful activity, corruption, theft, fraud, or wilful breaches of this Code. No team member 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. The careless or improper actions of just one team member can seriously damage our corporate reputation.

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

Thank you for your commitment to our Code of Conduct.

**David Foster**

**Executive Chair**

## 01 Our Code of Conduct

The Star Entertainment Group (**The Star**) adheres to high ethical and legal standards. The purpose of this Code of Conduct (**Code**) is to articulate the behavioural standards we have set for ourselves, and behaviours expected of our team members in the course of performing their duties of employment.

The Code sets out the behaviours of how we perform our duties in the best interests of The Star. By adhering to these behaviours, 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.

Guiding team members' decision making are The Star's Purpose, Values and Principles (**PVP**). These have been developed to establish a target culture for our organisation. The PVP is an ethical decision-making framework that sets out mindsets and behaviours that The Star and our team members should be considering and using to guide their actions.

This Code applies to all Directors, Executives, team members and contractors of The Star at all our locations. Breaches of the Code will have serious consequences and can lead to disciplinary action including dismissal.

### The Code and You

We expect all team members to:

- Read and understand your obligations under the Code.
- Complete any training related to the Code.
- Comply with the Code and related policies and procedures when performing duties.
- Use the Code as a guide for help to make difficult or ethical decisions.
- Report any breaches of the Code.

You are expected to demonstrate our Values by following the standards of professional conduct this Code outlines.

It is especially important that our Leaders lead by example. Leaders should encourage their teams to read and understand the Code and how it applies to them when carrying out their roles. You must work with your team to make sure that the Code becomes part of any decision-making process. Encourage your team to speak up if they encounter something they don't feel comfortable with.




## 02 Speaking Up


At The Star we are committed to fostering a speak-up culture as part of our risk-aware culture. We encourage you to call out all wrongdoing, including breaches of the Code. Any improper, unethical, or illegal activity should be reported as soon as possible. We treat any report of potential breaches of the Code with the utmost confidentiality.

You might see something that doesn't sit right with you. You might be facing a new situation that no one has had to resolve before. Challenging, taking ownership, and following through are fundamental to ensuring we achieve the right outcomes. It is up to every one of us to make sure we live by the Code.

Where possible you should report breaches to your leader however if you don't feel comfortable doing this The Star's Whistleblower Program provides you a secure, safe, and confidential way to report any behaviour which is contrary to the Code. We will protect and support a person who raises a concern in accordance with the Whistleblower Protection Policy. There is zero tolerance for retaliation against anyone who raises a concern.

There are a number of channels by which reports can be made. The table below outlines these channels. For further information consult the Whistleblower Protection Policy.

Reporting Channel	How to use the Reporting Channel
	<p>Call the secure external hotline – Your Call.</p> <p>You can make a report via telephone to the external Whistleblowing Hotline service operated by Your Call:</p> <p>1800 319 826 (7:00am to midnight AEST on business days).</p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report securely online – Rely platform.</p> <p>You can make a report to our online reporting portal at any time via:</p> <p><a href="https://star.relyplatform.com/report">star.relyplatform.com/report</a></p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report to an internal Eligible Recipient.</p> <p>You have the option to report to the following individuals authorised by The Star under the Corporations Act to receive reports:</p> <ol style="list-style-type: none"> <li><a href="#">Whistleblower Protection Officer.</a></li> <li>Any Director, Secretary, the Group Chief Executive Officer, a member of the Group Leadership Team, a “General Manager” or another senior manager of The Star.</li> <li>An actuary, auditor or member of an audit team conducting an audit of The Star.</li> </ol>

Reporting Channel	How to use the Reporting Channel
	<p>Report To an External Eligible Recipient.</p> <p>In accordance with the Corporations Act, a report may also be made externally to one of the following:</p> <ul style="list-style-type: none"> <li>• An external legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act.</li> <li>• ASIC, APRA, or a Commonwealth authority prescribed under the Corporations Act.</li> </ul>

## 03 Our Purpose, Values & Principles

### Our Purpose

At The Star we are committed to driving our purpose to *Create Fun at Trusted Destinations*. We provide destinations where people can come for an experience of their choosing. We take a balanced approach in our offerings; we are a place to have fun while doing what's right by our guests, our community, our regulators, and our key stakeholders.

### Our Values

Our values of *Lead with Integrity*, *Own it*, *Build Memorable Connections*, and *Take Good Care* set out how we aim to achieve our organisational strategies and outcomes. They are a collective call to action by defining The Star's collective character in the ways we operate and interact.

Lead with Integrity	Own it	Build memorable connections	Take good care
<ul style="list-style-type: none"> <li>• We are honest, and ethical.</li> <li>• We speak up and follow through to make sure the right thing is being done.</li> </ul>	<ul style="list-style-type: none"> <li>• Every person plays a unique role in making The Star shine.</li> <li>• We take responsibility and help each other grow</li> </ul>	<ul style="list-style-type: none"> <li>• Relationships and fun are at the heart of who we are.</li> <li>• We work together to create the best experience for anyone.</li> </ul>	<ul style="list-style-type: none"> <li>• The wellbeing and safety of our team, guests and communities is deeply important to us.</li> <li>• We protect, support, and positively contribute to our communities.</li> </ul>

### Our Principles

When in doubt of the right course of action or when our Values could lead us in multiple directions, we look to our Principles:

- We Live Our Values
- Respect the Dignity of All
- Never Exploit Vulnerability
- Take Actions That Build Trust



These help identify the RIGHT thing to do at The Star. Think of our Principles as “guardrails”, keeping us aligned to our new way forward.

Our Principles are the foundation of our ethical decision making. We make ethical decisions by [living our values](#), [never exploiting vulnerability](#), and [treating everyone with dignity and respect](#). These Principles guide our behaviour and set our expectations for transparency and fairness. We strive to create a culture of learning and growth, where we take actions that build trust and promote improvement.

## 04 Lead with Integrity

In order to [Lead with Integrity](#) team members should show specific positive behaviours. You should always follow the rules even when no one is watching. Do what’s right and ethical, even when it’s hard to do. Support your fellow team members to abide by both the letter and spirit of the law. Speak up and call out bad behaviour and inappropriate risk taking in a timely manner. Raise things with your leaders when you are uncomfortable or there is a better way of doing things.

When making decisions we should not only ask “can we” but also “should we”. At The Star we are committed to being transparent and straightforward. We want to foster a culture where everyone feels safe to speak up and we are committed to following up with action to achieve the right outcome. It is important that everyone knows what the rules are and are committed to following them.

How it applies to you:

- [Declare and register conflicts of interest](#) once they are identified. Manage and monitor conflicts of interest with appropriate controls. Where conflicts of interest cannot be managed, they must be avoided.
- [Never accept/offer a bribe or act corruptly](#). Making or seeking to make payments or benefits to anyone for the purpose of unlawfully or improperly advancing The Star’s commercial interests is prohibited. This includes offering a bribe, facilitation payment or any other benefit which might have the effect of providing The Star with an unlawful or improper commercial advantage.
- [Never ask for a gift](#) from any person in connection with your work at The Star. Report all gifts received or offered in connection with the performance of your employment duties, regardless of value.
- [Don’t make political donations](#) on behalf of The Star. This includes monetary or in-kind contributions. All team members are required to abide by state legislation that governs political donations. The Star has an annual political engagement program which focuses on non-election expenditure, corporate hospitality, and events.
- [Never improperly use or disclose confidential information](#) gained as part of your employment at The Star. You are not permitted to comment to the media on matters related to The Star unless you are an authorised team member. When using personal social media accounts, you are not permitted to include any confidential information obtained as part of your employment at The Star. The use of The Star branding or logos on personal social media posts is prohibited.

- **Understand and comply with legal and regulatory obligations** specific to your employment at The Star. Complete all training required for your role and mandatory The Star training when required. Read and understand policies and procedures relevant to your role. Ask your leader if you aren't sure of any of your obligations.
- The Star complies with continuous disclosure obligations under the *Corporations Act 2001* and the Australian Securities Exchange (ASX) Listing Rules. The Chief Legal Officer and Disclosure Officer are responsible for managing these communications including shareholder communications.

## Key Related Policies

- Conflicts of Interest Policy
- Anti-Bribery and Corruption Policy
- Gifts Policy
- Political Engagement Policy
- External Communications Policy
- Market Disclosure Policy
- Group Diversity and Inclusion Policy

## 05 Own It

At The Star we celebrate success when it aligns with our PVP. We always take responsibility for our actions. We all lead by example and embrace our values in all we do. Ensuring our team members are empowered to provide both good and constructive feedback is important in driving accountability. It is essential we create an environment where this is possible.

We embrace accountability and welcome scrutiny and respectful challenge. Our team members own what they do during the course of their workday at The Star. We treat the business as if it were our own. We understand that holding casino licences is a privilege and act in a way that appreciates that privilege.

How it applies to you:

- If your role requires you to hold a gaming licence you must **understand the requirements of your licence**. Team members are required to abide by their licence requirements including variations between states where applicable.
- We foster a **collaborative and open relationship with our regulators**. All communication and information shared is open, accurate, clear and comprehensive.
- We all have a collaborative responsibility for **reporting incidents and breaches** if we become aware of one.
- You must **complete all mandatory and role-specific training**, including any competency requirements.
- We **protect The Star's assets** and only use them for legitimate business purposes. We value and manage The Star intellectual property rights and respect the intellectual property rights of others.
- You must make sure that any **personal social media posts or comments comply** with The Star's policies.
- You must **participate in and fully co-operate with internal investigations** when requested and provide full disclosure of any information relevant to the investigation.

## Key Related Policies

- Regulatory Engagement Policy
- Incident and Breach Management Policy
- Training and Competency Policy
- External Communications Policy
- Team Member Gambling Policy

## 06 Build Memorable Connections

We create fun and exciting experiences at The Star. We listen to our guests to help address their needs. Team members work together to seek out the right advice and listen to different perspectives. We nurture two-way relationships and embrace diversity and foster inclusion. We respect our fellow team members and guests.

Diversity is one of our biggest strengths. We value uniqueness within our teams, guests, and communities. It helps us engage with each other on different levels throughout the business and provide those unique experiences we desire. Our passion for providing these experiences and connecting with our guests and community will make us people's favourite destination.

How it applies to you:

- Our workplace is safe and inclusive, wellbeing is promoted, and everyone is **free from unlawful discrimination, bullying and harassment**.
- We **cultivate a unique and diverse workforce** by implementing unbiased hiring practices, promoting equal opportunities, and actively seeking a wide range of candidates from various backgrounds. We reward team members when they demonstrate high standards, and strong values.
- We provide a work environment that values and utilises the contributions of team members with diverse backgrounds, experiences and perspectives through **improved awareness of the benefits of workforce diversity** and successful management of inclusion; and enhance our connection with the communities in which we operate
- We aim to provide a **safe, supportive and inclusive gambling environment** where Safer Gambling is a critical part of our organisational culture.
- We recognise and respect diversity and **do not discriminate against individuals**. We respect the rights and dignity of all team members, guests and the wider community.
- You should **treat all guest feedback with respect** and properly manage, record and respond to it.

## Key Related Policies

- Group Diversity and Inclusion Policy
- Safer Gambling Policy
- Talent Acquisition Policy
- Complaint Management Policy

## 07 Take Good Care

At The Star we create an environment where our team members and guests feel welcome and can be themselves. We act with authenticity, respect, and care. We protect the safety of our guests, teams, and business by proactively managing risks. We encourage open and respectful communication where we listen to concerns and respond effectively. We treat each other with respect and take care of each other.

We know that respect and care are the foundations of a sustainable business. We believe that people work best when there is trust. It is therefore important that we manage risks effectively to protect our team, guests, and community. Our social licence depends on taking good care of people in our communities.

We want to create a safe environment for gambling. We look after our guests welfare and look out for any signs of gambling harm. We provide our team members with training to identify these signs and how to support our guests that may require assistance.

How it applies to you:

- **We do not tolerate bullying, harassment or discriminatory behaviour** of fellow team members or guests.
- **We are polite and respectful in all our dealings with other people** – including guests, suppliers, colleagues and regulatory authorities.
- **You must complete all mandatory and role specific training** which protects our team members and guests such as Responsible Service of Alcohol and Safer Gambling
- **The Star supports the United Nations Guiding Principle on Business and Human Rights** and we expect our suppliers to respect all human rights, throughout their business activities.
- We are **committed to supporting community organisations and events**. We support a range of community and charitable partnerships that are aligned to the Company's values and the community partnerships principles of Sustainability, Diversity and Inclusion.
- We aim to **reduce our environmental impact and contribute to positive environmental outcomes** through our operations and supply chain
- We drive a **culture that respects privacy and personal information** of our guests and team members. Data is kept secure and used responsibly.
- We protect our community including through **meeting anti-money laundering and counter terrorism obligations**.

### Key Related Policies

- Group Diversity and Inclusion Policy
- Safer Gambling Policy
- Responsible Procurement Policy
- Environmental Policy
- Privacy Management Framework
- AML/CTF Program
- Workplace Behaviour Policy

## **08 Breaches of the Code**

The Star is committed to conducting its operations in a way that meets its commitments to regulators, guests, and the wider community. Non-conformance with the Code can pose a significant risk to The Star, guests, and the wider community, potentially resulting in punitive measures against The Star.

Team members who become aware of an actual or possible breach of the Code must follow the established protocols set out in our Incident and Breach Management Policy. The Incident and Breach Management Policy has strict timelines in place to satisfy regulatory requirements; if a team member has reason to believe that a breach may have occurred it is imperative that those protocols are followed expeditiously to avoid adverse consequences.

Breaches of the Code may result in disciplinary action, including termination of employment, financial consequences, and potential prosecution.