



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 for further details

Policy Details

Policy Owner

Group General Manager Culture

Effective Date

28 March 2025

Last Review Date

8 July 2026

Next Review Date

28 March 2027

Approved by

The Star Entertainment Group Board

Document Control

Version

5.3

TABLE OF CONTENTS

Message from the Group Chief Executive Officer	2
Our Code of Conduct	3
01 Our Purpose, Values & Principles	4
02 Lead with Integrity	5
03 Own It	6
04 Build Memorable Connections	7
05 Take Good Care	8
06 How to Make Decisions	9
07 Making Decisions – Scenarios	10
08 Speaking Up and Breaches of the Code	11
09 Anonymous Reporting of Breaches	12

Message from the Group Chief Executive Officer

Dear Team Member,

At The Star, our purpose is to create fun at trusted destinations, while doing what is right by our customers, our people, our communities, and our regulators. Achieving this relies on the everyday decisions we make and the standards we set for ourselves as an organisation.

Our Code of Conduct outlines the behaviours and expectations that guide how we work, how we treat one another, and how we represent The Star. It reflects our shared values and provides a consistent framework to support ethical decision making, particularly in situations where the right course of action may not always be clear.

We are proud of the diversity of our workforce and the different perspectives this brings. While our personal values shape us as individuals, our organisational values unite us and guide how we act with integrity, respect, and care — whether engaging with colleagues, customers, business partners, or the wider community.

Upholding the Code is essential to building trust, maintaining our licences, and protecting the reputation of The Star. Speaking up when something doesn't feel right, complying with our legal and policy obligations, and acting responsibly are fundamental to creating safe, positive, and trusted experiences across our business.

Please take the time to read, understand, and uphold this Code throughout your time with The Star.

Thank you for your continued commitment to our Code of Conduct.

Bruce Mathieson Jnr
Group Chief Executive Officer and Managing Director

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 while representing The Star. This may also include while not on duty.

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.

01 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
• We are honest, and ethical. • We speak up and follow through to make sure the right thing is being done.	• Every person plays a unique role in making The Star shine. • We take responsibility and help each other grow	• Relationships and fun are at the heart of who we are. • We work together to create the best experience for anyone.	• The wellbeing and safety of our team, guests and communities is deeply important to us. • We protect, support, and positively contribute to our communities.

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.

02 Lead with Integrity

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.
- [You must notify your manager as soon as possible](#) if you are arrested for, charged with, or convicted of an offence that may impact your employment with The Star.
- [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

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

03 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

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

04 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

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

05 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 safer gambling, anti-money laundering and counter terrorism obligations.

Key Related Policies

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

06 How to Make Decisions

Our frameworks and policies are in place to help us understand what is expected, but they will not be able to cover every decision we will make while employed at The Star. Applying good judgment to the decisions we make in our day-to-day will help us do the right thing for our customers, guests and The Star. The following 'Can we; should we' test is designed to help us work through decisions where the right answer is not always immediately clear.

CAN WE?

Does it comply with legislation and regulations?

Yes

No or Not Sure

Does it adhere with our policies and procedures?

Yes

No or Not Sure

Stop and discuss with your Leader.

SHOULD WE?

Does it align with our Purpose, Values and Principles?

Yes

No or Not Sure

Is this the right thing to do for our customers, community, and The Star?

Yes

No or Not Sure

Would I feel ok if I had to tell my colleagues, family, or friends that we did this?

Yes

No or Not Sure

Stop and contact your Leader for further advice.

If this is not possible, or you feel uncomfortable, see [Section 08. Speaking Up.](#)

You are likely in line with our Code of Conduct and can proceed, subject to any normally required approvals.

If YES to all questions

07 Making Decisions – Scenarios

What would you do in this scenario?

Mia, a restaurant supervisor, notices that a senior chef often makes inappropriate jokes about another Team Member's accent. The Team Member looks uncomfortable but doesn't speak up. Mia isn't sure whether to intervene.

It's important that we do the right thing and Raise It when we see something that just doesn't feel right.

If Mia is comfortable, she should address the situation professionally, reminding the senior chef that The Star does not tolerate bullying, harassment, or discriminatory behaviour. Mia should also check in with the Team Member and escalate the issue to People and Performance, if necessary.

Mia should also report the incident to her Team Leader or Manager.

What would you do in this scenario?

James is a dealer in The Star Sydney. He is on a trip with some friends and goes to The Star Gold Coast casino. James joins his friends at a table game and gives them some advice on how to get an advantage based on his knowledge from dealing that game. Sarah, a floor manager, recognises James and wishes him a good holiday.

While Team Members can go into our gaming area, they are not permitted to occupy a seat or remain around gaming tables or machines or provide advice or information that may be give or be perceived to give an unfair advantage in relation to our games.

On recognising James, Sarah should have approached him and asked him to leave the table as he was in breach of the Code of Conduct and the Team Member Gambling Policy.

Sarah must report breaches of our Code of Conduct and policies.

What would you do in this scenario?

David, a member of the F&B team is approached by a reporter as he is walking into work. They ask him questions about a story concerning The Star that was in a weekend newspaper. David politely declines to answer and continues into the building.

David did the right thing in this situation. Team members are not permitted to comment to the media on matters related to The Star. Media statements are coordinated by the Corporate Affairs team and all enquiries should be directed to them.

If you are approached by media whether it is in person or through other methods such as social media accounts, make sure you act professionally and decline to comment.

Report requests to your Team Leader or Manager or to the Corporate Affairs at your earliest convenience.

What would you do in this scenario?

Tom, a gaming floor attendant, notices a regular guest showing signs of distress while gambling. The guest brushes off concerns, but Tom is unsure whether to intervene.

Creating a safe and supportive environment is a key part of The Star's culture.

Tom follows proper procedure by discreetly offering support and notifying the Safer Gambling Team. He also ensures that the guest is aware of available resources for responsible gambling.

Protecting guest welfare is a core responsibility – by taking action and proactively managing risks and offering support, Tom helps create a safer gambling environment and upholds The Star's commitment to responsible gaming.

08 Speaking Up and Breaches of the Code

At The Star we are committed to fostering a speak-up culture as part of our risk-aware culture. 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.

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. 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 understand that raising concerns can sometimes feel challenging, but please know that all reports will be handled with care, confidentiality, and without fear of retaliation. Our goal is to maintain a positive and inclusive environment for everyone, and our commitment to upholding the standards and expectations set out in this Code of Conduct helps us achieve that.

If you need someone to talk to, The Star has partnered with [Sonder](#) to provide us all with on-demand personal safety, health, and wellbeing support through 24/7 access to counsellors, psychologists, emergency management and nurses. The Sonder app can be downloaded by scanning the QR code on the right and following the prompts. For more information about Sonder, visit our Employee Assistance Program (EAP) page.

If you are unsure about the best way to escalate an issue, we are here to support you – reach out to through one of the [Escalation Pathways](#), and we'll guide you through the process.



Escalation Pathways

To maintain a respectful and ethical environment, we have multiple pathways for the reporting and addressing of concerns related to the Code of Conduct. If you witness or experience a breach of this Code of Conduct, we encourage you to escalate the issue through the appropriate channels:

1. [Direct Resolution](#) – if you feel comfortable, consider addressing the concern directly with the individual involved in a respectful and professional manner.
2. [Leader, Manager or Supervisor](#) – if direct resolution is not suitable, or does not resolve the issue, report the concern to your Leader, immediate manager or supervisor for guidance.
3. [People and Performance or Group Compliance](#) – for more serious or sensitive matters, you can report directly to People and Performance or Group Compliance.
4. [Anonymous Reporting](#) – if confidentiality is a concern, you may use The Star's Whistleblowing Reporting channels set out on the next page.

09 Anonymous Reporting of Breaches

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
	Call the secure external hotline – Your Call. You can make a report via telephone to the external Whistleblowing Hotline service operated by Your Call: 1800 319 826 (7:00am to midnight AEST on business days). You may elect to remain anonymous or choose to share your contact details with The Star.
	Report securely online – Rely platform. You can make a report to our online reporting portal at any time via: star.relyplatform.com/report You may elect to remain anonymous or choose to share your contact details with The Star.
	Report to an internal Eligible Recipient. You have the option to report to the following individuals authorised by The Star under the Corporations Act to receive reports: 1. Whistleblower Protection Officer. 2. 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. 3. An actuary, auditor or member of an audit team conducting an audit of The Star.
	Report To an External Eligible Recipient. In accordance with the Corporations Act, a report may also be made externally to one of the following: • 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. • ASIC, APRA, or a Commonwealth authority prescribed under the Corporations Act.

Version	Amended by	Reason for change	Details of changes	Date
1.0	N/A	Original Issue	N/A	1 March 2018
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
5.1	Compliance	Change to reflect current organisational structure	New Message from the CEO, addition of Section 6, 7, 8 and 9.	13 February 2025
5.2	Compliance	Minor Change	Minor amendment to Section 07 to clarify obligations.	17 April 2025
5.3	People and Performance	Minor Change	Update to Message from the CEO and links to Whistleblower Protection Officer.	8 July 2026