



# **THE STAR REMEDICATION UPDATE**

# 1 Introduction and Summary

The Star Entertainment Group (TSEG or The Star) welcomes millions of guests each year across our three iconic properties - The Star Brisbane, The Star Gold Coast and The Star Sydney.

We employ nearly 9,000 Team Members across our properties, and our operations generate significant downstream employment and economic opportunities in the communities where we operate.

However, in recent years, shortcomings in leadership, coupled with gaps in controls and processes, enabled unethical conduct and criminal activity to occur within our properties. In late 2023, TSEG commenced a Remediation Program to address these issues.

The Remediation Plan has gone through a number of reviews to ensure that it remains fit for purpose, with the latest version approved by the Queensland Attorney-General, Office Liquor and Gaming Regulation on 19 June 2025. The latest approval was subject to conditions including ongoing reporting and monitoring.

This document outlines the expected outcomes from successful implementation of the revised Plan.

## 2 The Remediation Journey So Far

Since launching the original Plan in 2023, we've advanced more than 71% of the remediation activities (as at the end of August 2025), transforming the way we operate, lead, and engage with our guests, Team Members, and regulators.

### Cultural Uplift

The Star's Purpose, Values and Principles (PVP) was developed with inputs by Team Members across all levels of our organisation to define the target mindsets to shape our decision-making. We've embedded a comprehensive strategy to connect our people to our new PVP, guiding daily decisions and behaviours.

We've also established a detailed methodology to assess and report regular evidence-based progress of our culture reform, including the gap between baseline and target-state behaviours, mindsets and systemic reinforcers. Multiple internal initiatives and leadership programs are driving a more open, inclusive, and accountable culture. We have developed comprehensive culture action plans at each of our three properties, incorporating Pulse and survey results to define actions for further uplift.

### Leadership & Accountability

The Star has now commenced a transition to a decentralised operating model with the intention of promoting greater accountability at the Property-level for business performance, risk and compliance. This principle has been applied across all properties as part of our business's go-forward operating model design.

The model, when fully implemented, is intended to create clear lines of ownership, decision-making, governance and allow teams to operate with confidence. The agreed archetype for the end state is described as a 'Group strategic alignment and oversight model', with moderate Group intervention.

- **Co-strategy** - Group strategy is set centrally through collaboration with Properties. The properties have developed their own strategies to meet their unique ambitions whilst maintaining alignment to broader Group-wide pillars and objectives.
- **Central governance oversight** - Frameworks and policies are centrally defined to ensure consistency in key activities in line with our Three Lines of Accountability model.
- **Culture Governance** - The Group sets broad cultural principles and values but allows Properties to interpret and implement them to suit their local context.
- **Shared Technology** - Maintain technology in the centre to ensure consistency across Properties and derive benefits of scale with local system autonomy where appropriate.

We've launched a Leadership Program called Cornerstone that has trained over 800 leaders across key focus areas, which has helped to set the right tone, expectations, and behaviours, with future modules focused on leading change.

We've also onboarded and introduced a Group Leadership Team and Property Leadership Team.

## **Safer Gambling**

The Star prioritises the wellbeing of our guests and has in place policies and strategies to provide a Safer Gambling environment aligned with global best practice. We actively engage with Team Members, guests and external stakeholders to ensure that prevailing expectations are met or are part of continuous uplift in Safer Gambling.

The Star adopts a public health approach to gambling harm prevention and minimisation and recognises its role and responsibilities within the approach. This includes leveraging our access to guests, their data and our ability to actively intervene to prevent harm before or while it is occurring, not afterwards. This includes implementing time-play management, predictive models, and decentralised safer gambling teams under Property CEOs for stronger on-the-ground oversight and our guests can now self-exclude online.

We've also updated Standard Operating Procedures (SOP), provided new training and resources (including Mental Health First Aid and Advanced Interactions), ongoing awareness campaigns are further strengthening harm minimisation and introduced the "Safer Gambling Hub" within the Star App, placing safer gambling information tools and support in one prominent location for our customers to access.

## **Financial Crime Prevention**

We have continued to strengthen our financial crime frameworks, processes and controls through several key initiatives:

- **Customer Risk Assessment:** Refined our customer risk scoring methodology to better assess customer risk.
- **AML/CTF Program:** Updated our program to align with evolving regulatory expectations and operational needs.
- **Customer Due Diligence (CDD):**
  - Uplifted our CDD procedures.
  - Completed our remediation for Enhanced CDD.
  - Rolled out a new process to periodically refresh core Know Your Customer (KYC) information
- **Customer Screening:** Migrated to a more advanced platform to improve detection and monitoring capabilities.
- **Operational Resourcing:** Increased staffing within the Financial Crime Operations team

These initiatives enhance our ability to identify, and risk assess our customers, understand the source of their funds and manage associated risks. Next steps include refinement of screening frameworks, controls automation, and completion of comprehensive customer reviews.

## **Risk & Compliance**

Dedicated property-level Risk & Compliance teams now operate within a 'three lines of accountability' model, ensuing greater oversight and clarity.

We have strengthened Know Your Customer (KYC), introduced new Prevention of Play stop codes, and implemented multiple control manuals, across multiple jurisdictions.

Risk Appetite Statements are also being embedded into decision-making, supported by improved risk technology systems.

We've introduced a new Governance, Risk & Compliance (GRC) platform, Archer, which improves accuracy and consistency and better strengthens our risk and compliance management practices.

## **Governance**

We've refreshed governance structures to create clearer accountability and stronger oversight. With this, an independent Board Performance Review was completed in 2024, with a Board Renewal Plan undertaken to broaden skills, capacity, and perspectives.

As part of ongoing corporate governance reforms, The Star conducted a comprehensive review of its governance structure to identify and implement the optimal governance framework. A subsequent governance reform has taken place to include updated Board and Committee structures, reporting lines and independence requirements.

## **Operational Enhancements**

Property-level risk assessments are shifting control ownership closer to operations, with revised Internal Control Manuals completed for Gold Coast and Brisbane and we are leveraging learnings from Sydney's carded play and cash limits to Queensland casinos.

Our new operating model enhances control and supervision at each property, ensuring that the work under our amended Plan is fit for purpose, addresses feedback from various public inquiries including the Bell Two Inquiry and is effectively embedded at the property level.

## **Regulatory Engagement**

We're committed to doing the right thing and that means being transparent, proactive and accountable. Over the past year, we've improved how we report on our progress, strengthened internal transparency and increased engagement across the business to ensure we're meeting our obligations and driving meaningful change.

As part of this commitment, we provide formal monthly reports to both the NSW Independent Casino Commission (NICC) and the Office of Liquor and Gaming (OLGR) regulators outlining the progress of The Star's remediation program. These updates help demonstrate our ongoing efforts to rebuild trust and ensure compliance with regulatory expectations.

## Leadership

Our Group Leadership Team (GLT) has been significantly strengthened with the various appointments throughout 2024-2025, providing stability and executive capability to deliver business objectives, drive effective, long term cultural change and deliver remediation commitments.

Together, the GLT are accountable for overseeing the Group-wide cultural change program and remediation plan initiatives, as well as setting the strategic direction and overseeing the disciplined execution of our strategy and business plans

Along with our new GLT, a GLT charter has been put in place that clearly sets out the purpose of the GLT, formalises roles and responsibilities, and defines accountabilities for key matters including those between GLT members with Group and Property responsibilities.

## 3 The Remediation Plan

The Remediation Plan spans 14 workstreams spanning 101 initiatives containing a total of 578 milestones (or actions).

We are currently at our third re-iteration of the plan with further refinements made at each review to ensure clear and accountable deliverables that meet the organisations and regulatory requirements. The first version of the plan received regulatory approval in September 2023, of which this plan required further uplift and focus on embedment activities. The second version of the plan (V6.4) incorporated the activities required to ensure the deliverables were embedded and supported within the organisation. The third and current version of the plan came into effect due to several changes which related to the refinement of the plan to ensure clear pathways and consistency across all workstreams, initiatives and outcomes.

Current workstreams of the Plan are:

- Capability
- Compliance, Regulatory Engagement and Investigations
- Controls
- Exclusions Management
- Financial Crime
- Governance
- Internal Audit and Assurance
- Leadership

- Risk Management
- Safer Gambling
- Strategy and Legacy
- Strategy for Premium Players
- Technology and Data
- Values and Ethics

## Key Areas of Change

While extensive changes have been made at the individual activity and milestone level, the following changes provide a high-level summary of key differences between Version 6.4 (previous) and Version 7 (current) of the Plan.

<b>Milestone Content</b>	During the Plan reset, the content of the Milestones was updated to ensure previously identified issues were addressed and greater clarity was provided.
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Some additional changes include:

- Greater consideration given to organisation-wide programs to enable better planning, sequencing and prioritisation of change activities around peak periods and events.
- Time required to complete independent assurance by KPMG and Blackhall & Pearl has been incorporated into the new due dates for milestones, including greater clarity about the milestone outcomes and how they benefit our operations to inform the assurance process.

## 4 Supporting Our Ongoing Transformation

As part of the Plan review, we assessed our capability and capacity to deliver the Plan on time and to a high quality. The Transformation Office (TO) within TSEG comprises Team Members with experience in large-scale transformation who work across the business to deliver the Plan.

The TO supports the development of ongoing regular reporting for both internal and external purposes, leveraging real time access to project status data.

## 5 Looking Forward

As work progresses on our remediation, we are committed to delivering meaningful change by March 2026, as outlined in Figure 1.

CULTURE REFORM	SAFER GAMBLING	CONTROLS
<p>Implement various activities to drive meaningful and impactful culture reform:</p> <ul style="list-style-type: none"> <li>Annual culture reform assessment, including reporting to the board, executives, Special Manager and regulators.</li> <li>Incremental improvements to culture to address feedback to support monitoring and progression towards agreed interim and end state reform outcomes.</li> </ul> <p>Iterate culture assessment plan for Year 2 based on feedback from stakeholders, lessons learned from Year 1 assessment process, and objectives for Year.</p>	<p>Uplift controls in place to protect guests for gambling harm:</p> <ul style="list-style-type: none"> <li>Safer Gambling strategy embedded through team member, guest and community communications, capacity-building, leadership development and rewards and recognition in support of Safer Gambling practices.</li> <li>Introduction of personalised financial limits and transparency of time of play for carded/cashless tools.</li> </ul>	<p>Uplift in compliance frameworks and capability:</p> <p>Design and implement key controls in accordance with the prioritised plan relating to ICM and Casino Control Act obligations for the Corporate and Property functions.</p>
RISK MANAGEMENT	FINANCIAL CRIME	GOVERNANCE
<p>Risk management framework and capability is maturing:</p> <ul style="list-style-type: none"> <li>Implementation of supporting risk related policies, procedures and training materials.</li> </ul>	<p>Minimise financial crime by continuing to improve FC controls:</p> <ul style="list-style-type: none"> <li>Establish and implement uplifted enhanced customer due diligence policy and procedures.</li> </ul>	<p>Structure supports oversight and integrity of decision-making:</p> <ul style="list-style-type: none"> <li>The Governance Framework is operating in an effective manner where authorities, accountabilities and</li> </ul>



<p>Uplift of GRC technology to provide a consistent accurate view of all risks, emerging risks, incidents, controls and controls assurance testing.</p>	<ul style="list-style-type: none"> <li>• Calibrate a comprehensive suite of AML/CTF rules to ensure compliance with ICM requirements.</li> <li>• Implement a well-defined operating model including an overview of the current state, future state and end to end process.</li> <li>• Governance model implemented to facilitate complete and accurate financial crime reporting.</li> </ul>	<p>responsibilities are clear and understood. The flow of information across governance forums enables informed, timely and targeted decision making.</p> <ul style="list-style-type: none"> <li>• The Board focussed program of work is being executed and is subject to appropriate governance and monitoring to ensure effective achievement of the desired program outcomes.</li> </ul>
<b>TECHNOLOGY AND DATA</b>		
<p>Data quality and integrity uplift. Implement a series of solutions that will ensure each guest is carded and can use cashless funding methods across all gaming products in all gaming areas.</p>		

## 6 Expected Outcomes

While the remediation workstreams deliver a diverse number of activities over an array of functional areas, when delivered successfully they will collectively contribute to three broad outcomes that carry positive benefits for the community:

### **A Stronger, Safer, Sustainable Business for the Future**

TSEG is building for the future with the right structure, strategy and governance, supported by strong leadership to ensure long-term resilience and continued contribution to local economies, tourism, and the communities we serve.

In Queensland, our commitment to Brisbane and the Gold Coast has been a driving force behind multi-billion-dollar joint ventures that are reshaping both cities. In partnership with local and state governments, these landmark developments have generated thousands of jobs during construction and ongoing operations, while delivering world-class destinations that will benefit locals and visitors for decades to come. Today, we are one of Queensland's largest private employers, with more than 2,000 people working on the Gold Coast and an additional 3,000 roles created in Brisbane.

In Sydney, The Star has been an iconic destination for 30 years, employing more than 3,500 people and playing a central role in the city's leisure, hospitality, and cultural landscape.

Looking ahead, our remediation program will lay the foundation for sustainable growth and transformation. We will recalibrate expectations around gaming revenue while broadening our entertainment, leisure, and hospitality experiences across all properties. This evolution will position TSEG remains a trusted and enduring contributor to the communities we serve as we achieve our Vision to become the entertainment destination of choice.

## **A Safer Place for our Guests**

The successful delivery of our Safer Gambling Remediation Program is helping to create a trusted environment where guest can stay, play and be entertained with confidence knowing that criminal activity will not be tolerated, and that our people, processes and systems are working tirelessly to detect, disrupt and deter financial crime.

Our focus is clear: preventing harm, intervening early, and providing meaningful support through evidence-based initiatives that sit across the following four key pillars:

### **Pillar 1: Building a Safer Gambling Culture**

We adopt a public health approach to gambling harm, supporting individual while protecting in the wider community. Every level of our business is trained to recognise the early signs of harmful behaviour an empowered to raise concerns and act.

### **Pillar 2: Taking Good Care of Our Guests**

We take good care of our guests by giving them access to various tools and information that help them manage play responsibly. Initiatives such as carded play and cash limits are proving powerful safeguards enabling us to effectively and efficiently monitor activity, identify risks, intervene where necessary so that everyone can enjoy our venues in healthy, sustainable ways.

### **Pillar 3: Harnessing Data Insights**

By responsibly using loyalty and activity data in line with our Privacy Policy, are better understanding our guests and proactively identifying those at risk, helping us to deliver timely support and reduce harm.

### **Pillar 4: Partnering with Stakeholders**

We know real change requires collective effort. That's why we work closely with leading experts, community representatives, health professionals and industry peers – sharing insights, collaborating openly and driving continuous improvement.

Drawing on the lessons of carded play and cash limits already introduced in Sydney, we have expanded our Data and Technology stream of our Remediation Plan. This ensures that innovative technology, robust new tools, and advanced safeguards are in place not only to shape safer gambling behaviours, but also to protect our guests through rigorous cyber security and data integrity.

Together, these actions mean our venues are not just places of entertainment, but safer spaces where guests can feel empowered, informed supported and confident that their wellbeing comes first.

## **A Proud Culture for Team Members**

The success of our remediation relies on our people. There has been extensive engagement, learning, capability uplift and support incorporated throughout, spanning areas including leadership, risk, compliance and financial crime, with ongoing focus on our Purpose, Values and Principles (PVP) to support Values-based behaviours and conduct. Our Team Members feel proud to be playing an active role in transforming The Star into a stronger and more sustainable business.

## 7 Conclusion

Given the scale and complexity of the transformation ahead for The Star, our Remediation Plan provides clarity, structure and expertise needed to drive meaningful change built on hard lessons, renewed leadership and an unrelenting focus on doing better.

With the combined strength of our Board and Group Leadership Team, we are committed to setting things right and ensuring The Star not only resets and recovers, but re-emerges as a safer, more sustainable and stronger business into the future.