

Community and Charitable Partnerships Policy

SUBTITLE

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PURPOSE

This policy sets out the framework, principles and guidelines relating to community and charitable partnerships to be entered into by The Star Entertainment Group Limited (The Star) and/or its subsidiary companies.

Who the Policy Applies to

This policy applies to all directors and employees of The Star and associate companies, including:

- permanent full-time and part-time employees;
- employees on a fixed term or fixed task contract;
- · casual employees;
- temporary employees;

and all individual contractors and employees of incorporated contractors engaged by The Star.

BACKGROUND

The Star aims to be a responsible corporate citizen as part of its vision to become Australia's leading integrated resort company.

Each Star property is committed to supporting the communities in which they operate and where team members live and work. The Star, as part of its social licence to operate and its corporate social responsibility, chooses to support a number of charities and community organisations which operate in these communities and that align with our company values of **Sustainability**, **Diversity and Inclusion** and **City Pride**.

The purpose of this policy is limited to charitable, community and not-for-profit organisations specifically. Sponsorships and partnerships with primarily commercial and/or marketing objectives as well as political donations are not addressed in this policy.

OBJECTIVES

The Star's policy framework for community and charitable partnerships:

- Establishes a consistent basis to underpin the participation of The Star and its properties in events and activities in support of community and charitable organisations;
- Maximises the effectiveness of community partnerships for The Star and its partner organisations;
- Defines a consistent rationale for partner selection;
- Provides a reference guide in the assessment and activation of partnerships;
- Seeks to optimise participation and awareness among team members, guests and suppliers.

The Star's community and charitable partnerships are addressed through this policy in five ways:

- · Group level partner
- Property level partner
- · Community Grants via Found Monies
- Team Member Giving Program
- Capped property-level support (mostly in-kind support)

FRAMEWORK PRINCIPLES

The framework for establishing charitable partnerships of The Star and its properties is based on the following principles:

Group Level

The Star Entertainment Group will select a maximum of two community partners to support on a group-wide basis. These community partners must operate in both Queensland and New South Wales and align with The Star's company values of Sustainability, Diversity and Inclusion and City Pride.

Local Property Level

Each property in The Star will select up to a maximum of four community partners on a yearly basis. These community partners must operate in the state and local community of the property and align with The Star's company values.

This will enable The Star to provide meaningful support, leveraging a full suite of support activities, for a smaller number of community partners, rather than diluting support across a larger number of partners.

The Star, if deemed appropriate, may elect to enter into longer term (three-year) partnerships at a national and property level.

CRITERIA

The Star's community partner values are **Sustainability**, **Diversity and Inclusion** and **City Pride**.

Table 1: The Star's Community Partner Values

Strategic pillar	Material issue	Commitment / Authenticity	Theme	Why
Leading company	Ethical business operation	Global leader in promoting responsible gambling (DJSI / most prominent issue in materiality matrix)	Homelessness & mental health Programs that address these issues in Brisbane, Gold Coast, and/or Sydney.	Because we take responsible gambling seriously.
World class properties	Minimizing environmental impacts	Global industry leader (DJSI) QW 6 Star Green Community Rating	Sustainability Programs that deliver sustainable outcomes for the community.	Because we are committed to developing environmentally sustainable and resilient integrated resorts.
Talented Teams	Diversity, inclusion and equal opportunity	Transparency - aims and targets clearly shared in communications.	Diversity & Inclusion Programs that address discrimination in the workplace against gender/age/ ethnicity/sexual orientation as well as providing Indigenous pathways to employment.	Because this underpins how the company chooses to operate.
Leading company	Community well- being and trust	FY19 SGR committed AUD9M to community programs in Qld and NSW	City Pride Programs that are fundamental to and demonstrate synergy with Qld and NSW; or more specifically support tourism offerings in the communities where we operate.	Because we are a reflection of the cities in which we operate.

Each community partner selected, whether it be at a national level or local property level, must align to at least one of these values.

Approved community partnerships will also be required to:

- Provide direct benefit to communities that The Star operates in;
- Create opportunities for The Star to promote and partner with through events, fundraising or awareness opportunities (to be negotiated between the two parties);
 and
- Provide opportunities for team members participation, and potential options for quests and suppliers.

Community partner organisations must be companies or incorporated associations registered as a charity or not-for-profit.

Partners selected should reflect an appreciation of the business sector in which The Star Entertainment Group operates – specifically, entertainment including gaming, with an 18+ audience.

The Star will not consider community partnerships or charitable activities that do not reflect The Star's core values, strategic direction and brand attributes or that may present a reputational risk.

Support Elements for Community Partnerships

The following support can be made available to recognised community partners:

- Marketing and promotional support including:
 - recognition in relevant property corporate communications materials; and
 - marketing and communications materials;
- Indirect financial assistance including:
 - venue-wide fundraising (e.g. proceeds of concerts, restaurants and other specific events);
 - value-in-kind support (e.g. preferred rates for facility usage, vouchers);
 - provision of budget-relieving goods or services; and
 - work experience/placement opportunities;
- Direct financial assistance.

SUPPORTING OTHER COMMUNITY ORGANISATIONS

The Star's properties may also provide support at their discretion to other community organisations considered worthy and/or strategically important. The nature of this support, which has a capped annual value per property, should be limited to provision of accommodation and food and beverage vouchers or access to/usage of facilities (e.g. hotel rooms, function/event space) at designed "charity rates".

This support may also extend to purchasing of tables at functions, or similar lower level supporting activities.

Decisions to support other community organisations at a smaller, one-off scale will be made by Corporate Affairs (with input at a property level where appropriate) using an established selection criteria.

The properties will also consider contributions in response to 'natural disaster' events in the relevant State – e.g. bushfires or cyclones, particularly where the community in which a property is based (and employees live) is affected. This can be in addition to existing community partnerships that support communities during natural disaster events.

INVESTMENT LEVELS

This policy is reflective of the FY21 post-COVID environment and proposes a reduced level of spend for the next 12-18 months. Going forward, Corporate Affairs, in consultation with the Board and senior property leaders will ensure that the overall level of investment in community partnerships remains meaningful and appropriate in the context of The Star's corporate social responsibility and the sector in which it operates.

FOUND MONIES POLICY

Money that is raised directly from guests through mechanisms like standing charity donation boxes, "wishing well" fountains, or the proceeds of lost property sales is not counted as part of The Star's community partnerships. Found Monies will be used at each property for a Community Grants process that enables local community groups, charities and not-for-profits to apply for funding for a specific project or local event to be completed within the next 12 months of receiving the grant. Application forms and the criteria to assess the Community Grants will be publicly available on all property websites.

The assessment and disbursement of grant funding will occur on a quarterly basis and be managed by Corporate Affairs.

TEAM GIVING PROGRAM

The Star will run an annual program called "Open Your Hearts" where team members from each property can apply for in-kind support or small financial donations to assist their local charity, support organisation, cause, community group, school or sporting team. Open Your Hearts will launch in mid-2021, with winners announced in the following months. Entities nominated by team members for support must be a registered charity or not-for-profit and cannot be for a sole individual's benefit. Each property will have a fixed budget for the program and applications will be assessed through an established selection criteria by The Star Partnerships Council.

POLICY IMPLEMENTATION

The selection of new or continuing community partners will be subject to a selection criteria (outlined in Attachment A) and approved by a Star Partnerships Council.

The Star Partnerships Council will comprise of senior leaders from across all properties and supported by Corporate Affairs. The council will meet annually to consider existing or potential new community partners.

Community partner contract negotiations, day to day management of relationships and the distribution of funds and in-kind support to community partners will be managed by Corporate Affairs or delegated to an appropriate Star employee if required.

Quarterly reporting on the relationship and financial aspects of Community Partnerships will be through Corporate Affairs to Exco and the Board's People, Culture and Social Responsibility Committee as part of the regular operational reporting process.

Reporting on Community Partnerships will also be included in The Star's Annual Report and annual assessment for the Dow Jones Sustainability Index.

APPENDIX 1: Community Partnerships: Selection Criteria (if proposal meets one or more of The Star' community partner values

Profile	Theme	Cultural fit	Benefits value
weighting: 10	weighting: 40	weighting: 15	weighting: 35
Position Does the organisation have a strong, positive history, and does it have future potential?	Alignment Does the organisation/project deliver outcomes directly attributed to sustainability; diversity and inclusion in the workforce; or synergy with Qld/NSW way of life?	Values Does the organisation demonstrate strong values in how it operates?	Staff engagement Has the organisation put forward recommendations on opportunities for Star team members?
Presence Does the organisation/ project have a visible brand presence in the community?	Program Has the organisation proposed an initiative that Star can solely support?	Brand Is the organisation a reflection of the Star brand pillar Local Spirit?	Communications Has the organisation put forward opportunities for driving mutually beneficial communications through their channels?
Interest Is the organisation/ project beneficial to communities in Brisbane, Gold Coast or Sydney?	Leadership Has the organisation demonstrated a commitment to work with Star to deliver effective outcomes through this initiative?	Respect Has the organisation demonstrated respect for the community in which it operates/has impact?	Resources Has the organisation identified opportunities to leverage Star skills and properties?